

Local Development Plan, draft Plan Strategy (DPS) Consultation - Survey

Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

Formal Consultation period

The Statutory Consultation period opens on 17 October 2025 and closes at 4.30pm on 15th December 2025

Responses to be returned to the LDP team at

2 Church Street , Newtownards BT23 4AP

or by email to planning@ardsandnorthdown.gov.uk

Respondents should note that any representations should be made in full to the Council. Further information or clarification will not be sought unless requested by an independent examiner.

Soundness

A key feature of the local development plan system is 'soundness' which requires the development plan document to be tested in terms of content, conformity and the process by which it is produced, at independent examination (IE).

The tests of soundness are based upon three categories which relate to how the development plan document (DPD) has been produced, the alignment of the DPD with central government regional plans, policy and guidance, and the coherence, consistency and effectiveness of the content of the DPD.

More information on Soundness is available : [Development Plan Practice Note 6 Soundness](#) .

Tests of Soundness

The tests of 'Soundness' for Development Plan documents are as follows:

Procedural tests

P1 - Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

P2 - Has the Council prepared its Preferred Options Paper and taken into account any representations made?

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

Consistency tests

C1 - Did the Council take account of the Regional Development Strategy?

C2 - Did the Council take account of its Community Plan?

C3 - Did the Council take account of policy and guidance issued by the Department?

C4 - Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

CE2 - The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

CE3 - There are clear mechanisms for implementation and monitoring.

CE4 - It is reasonably flexible to enable it to deal with changing circumstances.

1. Name:

David Donaldson

2. Address

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6. Are you responding as an individual? (optional)

**Choose exactly 1 option*

No

7. Are you responding on behalf of an organisation? (optional)

**Choose exactly 1 option*

NO

8. Organisation and Job Title (if applicable): (optional)

DONALDSON PLANNING LTD

9. Are you an Agent responding on behalf of a client? (optional)

**Choose exactly 1 option*

YES

10. Client Name , address (if applicable): (optional)

NUGENT ESTATE COMPANY

C/O DONALDSON PLANNING LTD

11. Do you wish to upload a document to add to your survey response? (optional)

Please note the maximum size of files that can be uploaded is 50MB

This field cannot be completed on paper. Please use the online version of this form instead.

YES – SEE ATTACHED SUBMISSION REF DD12

12. Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

**Choose exactly 1 option*

X Oral Hearing (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.

13. Soundness of the Plan (optional)

Do you believe the draft Plan Strategy is sound?

**Choose exactly 1 option*

X No

14. If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below. (optional)

CE1 AND CE2

15. Procedural Tests - (optional)

P1 Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

**Choose exactly 1 option*

X Yes

16. Test P1 Comments (optional)

N/A

17. P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made? (optional)

**Choose exactly 1 option*

X Yes

18. Test P2 Comments (optional)

N/A

19. P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal? (optional)

**Choose exactly 1 option*

X Yes

20. Test P3 Comments (optional)

N/A

21. P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD (optional)

**Choose exactly 1 option*

X Yes

22. Test P4 Comments (optional)

N/A

23. Consistency Tests (optional)

C1 Did the Council take account of the Regional Development Strategy?

**Choose exactly 1 option*

X

Yes

24. Test C1 Comments (optional)

N/A

25. C2 Did the Council take account of its Community Plan? (optional)

**Choose exactly 1 option*

Yes

26. Test C2 Comments (optional)

N/A

27. C3 Did the Council take account of policy and guidance issued by the Department?
(optional)

**Choose exactly 1 option*

Yes

28. Test C3 Comments (optional)

N/A

29. C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district? (optional)

**Choose exactly 1 option*

Yes

30. Test C4 Comments (optional)

N/A

31. Coherence and Effectiveness Tests (optional)

CE 1 The DPD sets out coherent strategy, from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils?

**Choose exactly 1 option*

No

32. Test CE 1 Comments (optional)

33. CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
(optional)

**Choose exactly 1 option*

No

34. Test CE 2 Comments (optional)

SEE WRITTEN SUBMISSION

35. CE 3 There are clear mechanisms for implementation and monitoring? (optional)

**Choose exactly 1 option*

No

36. Test CE 3 Comments (optional)

37. CE 4 It is reasonably flexible to enable it to deal with changing circumstances? (optional)

**Choose exactly 1 option*

No

38. Test CE 4 Comments (optional)

39. If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound. (optional)

SEE ATTACHED SUBMISSION

40. Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy? (optional)

41. Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)
(optional)

Do you have any comments?

N/A

42. draft Habitats Regulations Assessment(HRA) (optional)

Do you have any comments on the draft HRA?

N/A

43. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

44. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

45. Please add any additional comments (optional)

N/A

What Happens Next?

Thank you for your representation to the Local Development Plan draft Plan Strategy (dPS).

You will receive a formal acknowledgement letter from the Council's Planning Department . We will issue this within 5 working days of your response.

This is in addition to the acknowledgement auto-generated by the Go Vocal system.

Representations received during the public consultation stages of the Plan Strategy and Local Policies Plan, must be made available for public inspection, both in hard copy, and on the Council's website, as required by Legislation.

Representations will also be shared with an Independent Examiner such as the Planning Appeals Commission and the Department for Infrastructure as part of the Local Development Plan Examination Process.

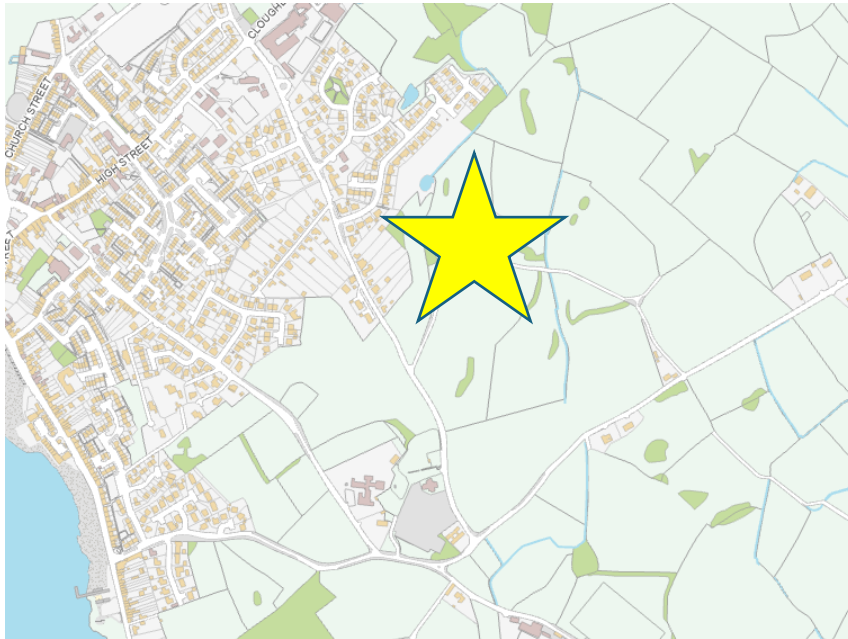
REF: DD12

DRAFT PLAN STRATEGY REPRESENTATION ON BEHALF OF NUGENT ESTATE

SUBJECT: SPATIAL GROWTH STRATEGY AND ALLOCATION TO PORTAFERRY

1.0 INTRODUCTION

- 1.1 This submission to the Draft Plan Strategy is in relation to Portaferry, on behalf of the Nugent Estate.
- 1.2 The Nugent Estate owns substantial areas of farmland and estate land around Portaferry. It has extensive agricultural and commercial interests in the area, and it is supportive of a thriving local economy and a good supply of housing to serve local needs.
- 1.3 The Estate owns land at Parson Hall, to the east of Ballyphilip Road, which is well located in relation to the fabric of the settlement:



Legislative Context for Representations

- 1.4 Part 2 of the Planning (NI) Act 2011 sets out the general requirements for local development plans. This states that the purpose of the Independent Examination is to determine whether: a) it satisfies the requirements relating to preparation of the DPD; and b) whether it is 'sound'.
- 1.5 The soundness tests relate to procedure; consistency; and coherence and effectiveness.
- 1.6 In relation to this submission, the **'coherence and effectiveness tests'** are the most relevant. These are:

CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

CE2 – are the policies and allocations realistic and appropriate having considered alternatives and founded on a robust evidence base;

CE3 – there are clear mechanisms for implementation and monitoring; and

CE4 – it is reasonably flexible to deal with changing circumstances.

2.0 PLAN OBJECTIVES

2.1 The key objectives of the Plan are set out below:



Spatial and Cross-cutting Objectives

Promote sustainable growth in the right places and at the appropriate level, to meet the needs of all those who live, work, visit and invest in the Borough.

A Healthy and Safe Place

1.123 By 2032, healthy and safe sustainable communities have been created with a mix of housing types and tenures in suitable locations – including accessible and affordable homes. Communities offer a good range of community facilities with access to jobs, key services and infrastructure, thereby reducing the need to travel. Opportunities are realised to promote the active participation of residents of all age groups in physical and cultural activity and to enjoy good health and wellbeing.



Social Objectives

To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.



Economic Objectives

To support a thriving, well-connected, diverse economy to enable and encourage business growth and attract inward investment and businesses in appropriate growth sectors.

To support the Council's ambition of employment growth through the provision of accessible land for employment, including for start-ups and grow-on spaces in a choice of sites at a range of locations.

2.2 Plainly, to be sound the DPS must bring forward policies and proposals which will deliver upon these objectives.

3.0 SPATIAL GROWTH STRATEGY

3.1 A fundamental element of the DPS is its spatial growth:

SGS 1: Spatial Growth Strategy

- Focus growth in Bangor and Newtownards as the principal settlements of the Borough, strengthening their roles as the primary locations for future housing and economic growth and investment in the Borough;
- Consolidate and strengthen the role of Holywood as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough;
- Consolidate the role and function of the small towns of Comber and Donaghadee as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands;
- Consolidate Portaferry as a new small town within the settlement hierarchy to reinforce its role and function as an important local centre for housing, employment, facilities and other services serving the rural hinterland of the Ards Peninsula;
- Sustain and maintain the diversity and quality of our villages by encouraging local development which supports the population and services of local communities; and
- Sustain and maintain our rural communities in small settlements and the countryside by facilitating sustainable development of an appropriate scale and character that affords protection to rural character and our rich natural environment.

3.2 The SGS is considered to be generally consistent with the RDS.

3.3 The two largest settlements are identified as the primary locations for future housing and economic growth.

3.4 Significantly, **Portaferry** is singled out as a new 'small town' where its role and function will be reinforced as an important centre for housing, employment, facilities and other services to serve the rural area. Technical Supplement 1 lists its key facilities as follows:

2,372	<ul style="list-style-type: none"> • Mix of retail & professional services. • Medical Centre. • Fire Station. • Credit Union. • Public library. • Primary schools & Secondary. • Community Centre. • Leisure centre & playing fields. 	Available capacity at WWTW. Portaferry Public realm scheme completed November 2023.
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3.5 The SGS2 Settlement Hierarchy, which confirms the role of Portaferry as a small town, is set out below:

SGS 2: Settlement Hierarchy

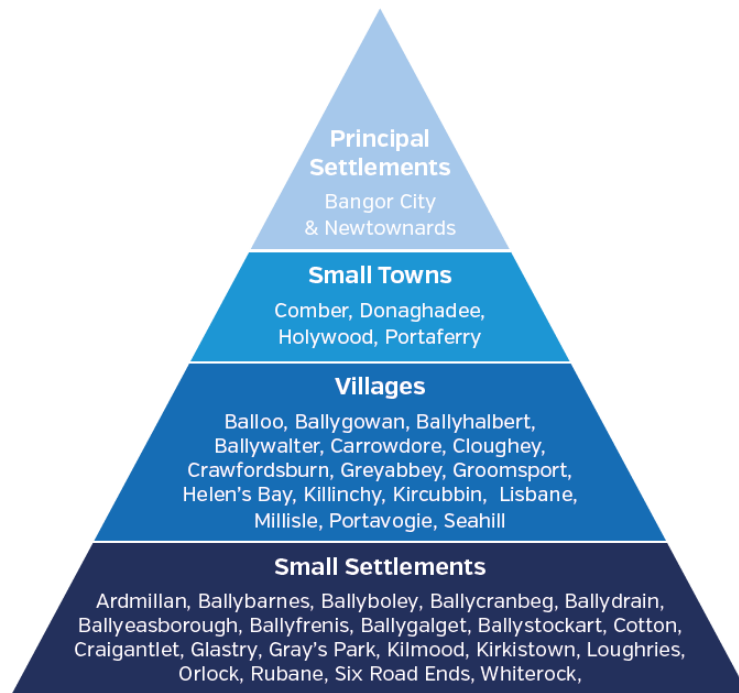


Figure 3: Settlement Hierarchy

3.6 The SGS4 Housing Allocation is below:

SGS 4: Strategic Housing Allocation

- Allocate 15,608 new homes to meet housing need and support job creation over the Plan period;
- Manage housing growth to achieve sustainable patterns of residential development across the Borough (see SGS 5: Strategic Housing Allocation across settlements); and
- Management of the release of housing land to ensure the LDP maintains a 5-year supply throughout the Plan period (see SGS 6).

The allocation of 15,608 homes up to 2032 is supported.

- 3.7 The PS notes that the housing allocation was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.
- 3.8 The Strategic allocation is founded upon an employment led approach. This is consistent with the Council's 'Integrated Tourism, Regeneration and Economic Development Strategy' produced in 2018. Whilst this has resulted in a figure which exceeds the HGI figures for the Borough, it must be considered soundly based, as the ambition to achieve employment growth within the Borough is an entirely legitimate objective.

Allocation to Settlement Tiers

- 3.9 Table 4 indicates that 61% of the housing allocation will be to Bangor and Newtownards. The **four small towns (including Portaferry) will collectively receive 22% of the allocation**; the villages will receive 10% and the small settlements 1%. This has resulted in the allocation figures below:

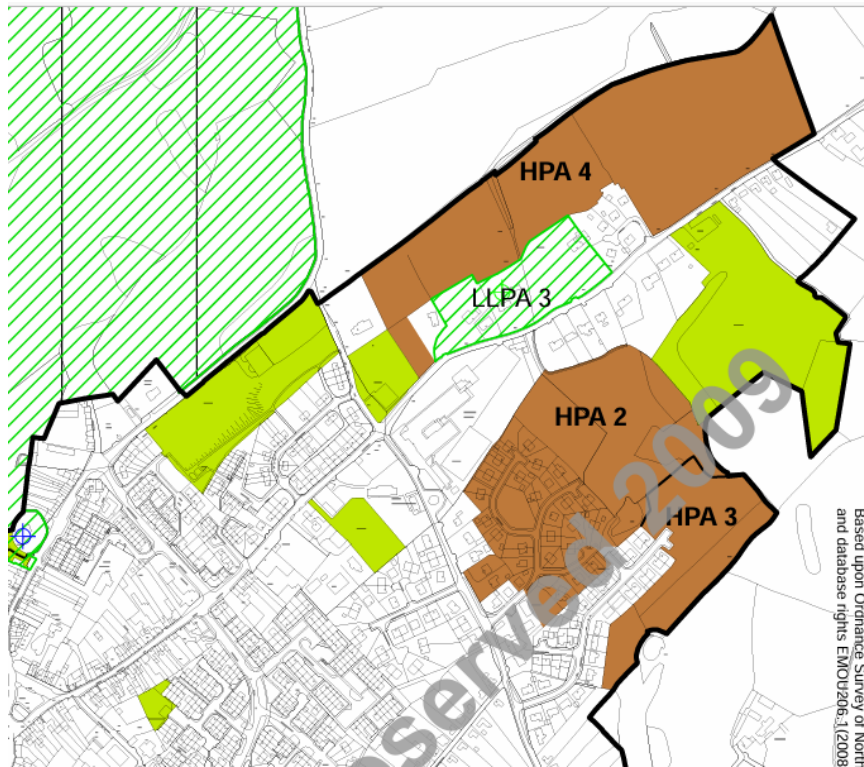
SGS 5: Strategic Housing Allocation across settlements

Table 6:
Strategic Housing Allocation across settlements⁸

	Potential Housing Supply (units)				
	Housing Allocation 2017-2032	Existing Commitments	Urban Capacity Potential	Windfall Allowance	Total Potential Housing Supply
Bangor	4,508	1,072	412	520	2,004
Newtownards	3,381	3,323	486	520	4,329
Comber	1,193	1,068	85	190	1,343
Donaghadee	795	522	34	150	706
Hollywood	398	210	23	120	353
Portaferry	398	176	75	70	321
Villages	1,265	1,076	-	690	1,766
Small Settlements	176	106	-	130	236
Countryside	535	302	-	-	302
Total	12,649	7,855	1,115	2,390	11,360

Principal Settlements

- 3.10 It is evident that Bangor and Newtownards have the largest allocations, with 4,508 and 3,381 houses respectively.
- 3.11 **Portaferry is identified with an allocation of 398 houses, and a potential supply of 321. This results in a requirement for land to be identified for an additional 77 houses in the town.**
- 3.12 The potential supply figure of 321 appears to be largely dependent upon delivery of three housing zonings in the Ards and Down Area Plan. These are as follows:
- HPA3 – Now largely completed;
 - HPA2 – Part completed, but no planning history on remaining 50%; and
 - HPA4 – recent planning permission on part for 32 dwelling units (LA06/2023/1336/F).



- 3.13 The existing zonings are unlikely to deliver anywhere near the anticipated 176 units over the Plan period.
- 3.14 Similarly, the urban capacity figure of 75 (Technical Supplement 2b) is based largely upon a single potential high density site in the middle of the town, for which there is no record of an extant permission, and which cannot be relied upon to be delivered.

5.49 Portaferry

Table 12. Portaferry Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
3	To the rear of 5b, 5c, 5f and 5g Cloughey Road, Portaferry.	0.5ha	6
5	Site to the south of 2 Steel Dickson Avenue, 8-12 Shore Road, including and to the rear of 2-28 Ferry Street and 22-31 The Square, Portaferry.	0.58ha	63
6	Former PSNI station, 2 Coach Road, Portaferry.	0.18ha	6
		Total	75

NB. No Development Opportunity Sites were identified within Portaferry.

- 3.15 It is also notable that Portaferry has a defined need for at least 20 social housing units;

Table 4: Five Year Projected Social Housing Need 2023-28 (Source: Commissioning Prospectus, NIHE)

Settlement	Housing Need Assessment Area	Total 5 Year Projection
Newtownards Town	Newtownards Town	209
Bangor Urban	Bangor Urban	600
Holywood	Holywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomsport	Groomsport	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) ¹³		40
Total	Ards and North Down	1,390

- 3.16 **Delivery** of housing is an important element of the Plan. The NPPF in England has reinforced the need to ensure that housing is likely to be delivered. The Ards and North Down Plan Strategy must ensure that its housing evidence is suitably robust. The 2019 NPPF definition of 'deliverable' is below:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

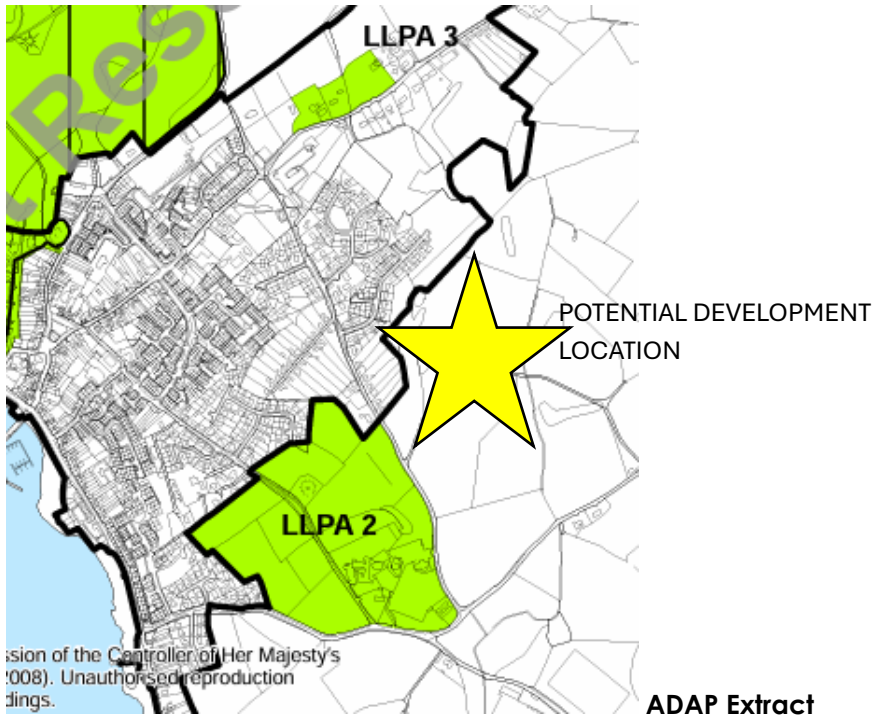
- sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 3.17 Whilst the allocation of 398 units to Portaferry is welcomed, the potential supply figure of 321 indicated in Table 6 is unlikely to be deliverable, especially as sites zoned for a considerable period have not yet been brought forward for development. The Plan Strategy should therefore ensure that sufficient land is identified at Local Policies stage to ensure that the zonings are **deliverable** for housing over the lifetime of the Plan.

4.0 LANDS AT BALLYPHILIP ROAD

- 4.1 The land at Ballyphilip Road is well located in relation to the town. It will not extend the settlement along the sensitive coastlines, nor will it extend the settlement to the east.
- 4.2 The land has good frontage to Ballyphilip Road and is directly adjacent to the housing development which is now being completed at Rockfield.

- 4.3 Importantly, the land is also outside the area which has been defined as an LLPA in the ADAP, and it is neither prominent nor intrusive. Development at this location could be accommodated without detriment to the character or setting of the town.



View eastwards from Ballyphilip Road

- 4.4 Safe access and services are available.
- 4.5 This is clearly a location which can make a positive contribution to delivery of the Plan Strategy objectives for the reinforcement of Portaferry as a sustainable location for development which will enhance its role as a local service centre.

5.0 CONCLUSIONS

- 5.1 The identification of Portaferry as a 'small town' is supported, as is the proposed housing allocation. However it is evident that the Plan Strategy should confirm that additional land will be required in order to ensure the delivery of the housing which will be necessary to ensure it fulfils the role identified in the Spatial Growth Strategy.

DONALDSON PLANNING

DECEMBER 2025