

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 Mounstephen

2. Address

Fleming Mounstephen Planning, Unit A101, Portview Trade Centre, Belfast

3. Post Code (optional)

BT4 1HE

4. Email (optional)

david@fmplanning.co.uk

5. Phone Number (optional)

07786671080

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

**Choose exactly 1 option*

Yes

No

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

**Choose exactly 1 option*

Yes

No

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

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

**Choose exactly 1 option*

Yes

No

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

Mr William Adams, Property Director, Henderson Group, PO Box 48, Hightown Avenue, Newtownabbey, BT36 4RT

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.

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*

Written (Choose this procedure to have your representation considered in written form only)

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*

Yes

No

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

Coherence and Effectiveness Tests – CE 2

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*

Yes

No

16. Test P1 Comments (optional)

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

**Choose exactly 1 option*

Yes

No

18. Test P2 Comments (optional)

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

**Choose exactly 1 option*

Yes

No

20. Test P3 Comments (optional)

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*

Yes

No

22. Test P4 Comments (optional)

23. Consistency Tests (optional)

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

**Choose exactly 1 option*

Yes

No

24. Test C1 Comments (optional)

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

**Choose exactly 1 option*

Yes

No

26. Test C2 Comments (optional)

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

**Choose exactly 1 option*

Yes

No

28. Test C3 Comments (optional)

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

No

30. Test C4 Comments (optional)

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*

Yes

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*

Yes

X No

34. Test CE 2 Comments (optional)

Strategic Policy RH1 – Retail Centre Hierarchy: The Council’s Technical Supplement Paper 6 Town Centres and Retailing in relation to Local Centres (para. 8.10) concludes that *‘the retail study carried out by Nexus in 2022 did not support the designation of any additional local centres.’* The Nexus Retail and Commercial Leisure Study only considered one potential additional local centre designation, namely, Ballygowan. There is no evidence that consideration was given to any other local centres. Given the definition of Local Centre, namely *‘provides (or has the potential to provide) a range of accessible small scale convenience shops, retail services and community facilities with a focus on local, everyday need such as a general grocery store, sub-post office, small pharmacy etc.’* it is considered that other Local Centres could have been designated e.g. at Rathgael Road, Bangor; Donaghadee Road, Newtownards and Torgrange, Holywood.

Policy RET1 – Retailing and main town centre uses: The section on ‘Local Shops’ includes a permissive policy for *‘a small-scale convenience shop or retail service which does not exceed 100 sqm gross external area’*. There is no evidential basis for the 100 sqm figure. The basis for it is not explained in the justification and amplification text nor is it mentioned in either Technical Supplement 6 or the Retail and Commercial Leisure Study. Whilst the Retail and Commercial Leisure Study includes a chapter on retail trends, it does not include consideration of trends in terms of shop size. Over the period 2020-2025, 35 SPAR stores have closed and these have had an average net floorspace of 105 sqm.

Policy RET3 – Local Centres: The proposed policy states that planning permission will be granted provided *‘any individual unit created as a result does not exceed 500 sqm gross floorspace for convenience shopping’*. There is no evidential basis for the 500 sqm cap. The basis for it is not explained in the justification and amplification text nor is it mentioned in either Technical Supplement 6 or the Retail and Commercial Leisure Study. The appropriate scale of floorspace can be assessed as is currently the case under SPPS policy by way of assessment of need and impact. Policy RET3 should facilitate convenience shopping within local centres subject to assessment of need and impact without any floorspace cap. The draft Plan Strategy recognises that Ashbury Avenue, which has a EUROSPAR convenience shop greater than 500 sqm gross, functions as a Local Centre – convenience shops over 500 sqm gross floorspace meet local needs and sustain communities and should be facilitated under Policy RET3 with criterion (a) deleted.

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

**Choose exactly 1 option*

Yes

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*

Yes

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 answer to 34.

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?

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

Do you have any comments on the draft HRA?

43. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

44. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

45. Please add any additional comments (optional)

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.