

**BY EMAIL**

15<sup>th</sup> December 2025

Our Ref: C05809

Planning LDP Team  
Ards and North Down Borough Council



Dear Sir/Madam,

**Re: Ards and North Down Borough Council Local Development Plan – Response to the Draft Plan Strategy relating to lands located on Ballykillaire Road**

This letter is submitted on behalf of our client Radenor Ltd. and relates to the publication of the Council draft Plan Strategy, which was launched by Ards and North Down Borough Council in September 2025. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this, we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the Development Plan Document (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; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

### District Profile

The Borough has a population of 163,659 (2021 Census) usually resident population. The Northern Ireland trend is that while the number of children and people aged 16 to 64 are both projected to decrease over the next 25 years, the number of people 65 and over is projected to increase. Since 2001, the number of pensioners in Ards and North Down has been above the NI average, numbers have increased and are also projected to rise further between 2018 and 2028. The projected proportion change is 23.1% whilst the proportion of working age people is projected to decrease by 1.1% over the same time period.

It is recognised that although there are no motorways, the settlements of the northern portion of the Borough are well connected via nine Protected Routes, as well as key link corridors that cross the Borough boundary into the Belfast Metropolitan Area. Accessibility to Belfast is further enhanced by bus and NI Railways services, but reliance on the private car remains high.

### Ards and North Down Borough Council Vision

*'Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live'*

We **support** this vision as it reflects the Council aspirations for the area where people will enjoy a good quality of life with an equality of opportunity for all. It sets out that the Council will plan for a sustainable, well connected, high-quality development, whilst protecting the environment and cultural heritage.

### Spatial and Cross Cutting Objectives

The LDP aims to deliver its vision through the main strategic objectives which are categorised broadly into spatial/cross-cutting objectives; economic development objectives; social development objectives and environmental objectives.

We support the objective to '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.' Bangor is strategically placed with its railway and public transport links to Belfast City Centre, Belfast City Airport and the settlements of Holywood, Seahill, Helen's Bay and Crawfordsburn along the main railway line.



We are **generally supportive** of the objectives in principle specifically the social objectives which aim '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. To create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.'

We **disagree** with the detail of some of the objectives specifically relating to housing allocation, although further discussion on the relevant strategic policies will be discussed in detail later within the representation. It is considered that given Bangor's primacy as the main settlement within the Borough that it should be allocated an increased proportion of housing. Its strategic location offers a sustainable opportunity to focus housing within the best connected locations within the Borough with a reduced focus on the private car. It is considered that Bangor has the realistic infrastructural capabilities of being best placed to accommodate an increased provision of housing within the plan period.

We agree with the economic objective which aims '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. To sustain and enhance vibrant and attractive town centres, serving the needs of residents, visitors, tourists and businesses.'

Bangor's status as the primary settlement within the Borough ensures that it is best placed to meet the economic objectives with its existing connections and ability to accommodate a growing workforce.

Bangor is well placed to meet the infrastructure objectives 'to support more sustainable movement patterns by promoting a mix of land use allocations in accessible locations alongside improved digital connectivity, whilst providing opportunities for active travel and integrated sustainable transport above use of the private car.' Accordingly, Bangor should be allocated a much higher proportion of land for both housing and economic development given its existing locational advantage provides opportunities for active travel and integrated sustainable transport.

## **Spatial Growth Strategy**

It is acknowledged that with the transfer of majority of planning functions to local councils in 2015, there has been a shift in approach. Whilst some councils still rely on HGIs, others are opting to reflect local circumstances such as the aspirations of their Community Plan and other local growth strategies to set their housing requirement.

### **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).

A letter from the Department for Infrastructure (DfI) Chief Planner and Director of Regional Planning, dated 25 September 2019, recognised and endorsed this approach, stating: “Rather than accepting the HGI estimate as a target to be planned for, Councils should first consider its applicability to local circumstances in the context of the above-mentioned assessments and other relevant local evidence. This may include, for example, other Council strategies/objectives (for instance in relation to urban regeneration or economic growth); the likely impact of corresponding strategies in neighbouring councils; the capacity of existing or planned infrastructure to facilitate development; or other evidence in respect of recent build rates.

**Table 10: Housing Growth Scenarios for Ards and North Down**

<b>Housing Growth Scenario</b>	<b>Total housing units 2017-2032<sup>18</sup></b>	<b>Housing units (average per annum<sup>19</sup>)</b>
<b>HGI-led</b>	<b>5,500</b>	<b>367</b>
<b>Demographic trend led (SNPP-2018)</b>	<b>4,883</b>	<b>326</b>
<b>Dwelling led (past build rate)</b>	<b>9,219</b>	<b>615</b>
<b>Employment led 'success' scenario</b>	<b>14,189<sup>20</sup></b>	<b>946</b>
<b>Employment led 'high growth' scenario</b>	<b>10,795<sup>21</sup></b>	<b>720</b>

The 2016 HGI would therefore not appear to be locally applicable to the Borough in terms of facilitating the current trend of housing supply. Moreover, as the HGI is policy neutral, this scenario does not consider local factors such as the need to attract and house a workforce to support continued employment growth or meeting the affordable housing need within the Borough.

#### Employment-led scenarios

There is an inter-reliance between employment growth, population growth, and housing growth. Aspirations for employment growth through job creation are normally realised through population growth in the working-age cohort of 16-64, alongside accompanying growth in related cohorts. This, in turn, should be aligned with housing growth to ensure that sufficient land is allocated to meet the housing needs of the population and support the planned employment growth over the plan period. Conversely, lack of employment opportunity will stymie in-migration to the Borough in the working-age cohort. It is likely that this would exacerbate population decline and an increasingly aging population with accompanying decreases in the working age profile and that of children aged 16 and under.

The Council's ambition as set out in the Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 (ITRDS) sets out a "success scenario" of 7,500 new employee jobs by 2030. As the ITRDS covers a 12-year period between 2018 and 2030, this equates to an annual job creation figure of 625. Extrapolating this annual job creation figure of 625 over the 15-year plan period gives a total of 9,375 jobs.

The ITRDS also makes reference to a 'high growth' scenario, identified by the NI Skills Barometer forecast, with the creation of c. 4000 jobs over the strategy period of 2018-2030

Further demographic analysis and modelling was carried out to take account of the two employment scenarios set out in the ITRDS. This modelled the population growth required to support an increase in the labour force projected to fill the job creation targets for the Borough for both the 'success' and 'high growth scenarios'.

The modelling showed that achievement of the 'high growth' scenario would necessitate a population increase of 17,871 which equates to 10,173 households. This gives a total new dwelling requirement of 10,795 over the plan period or 720 dwellings per annum.

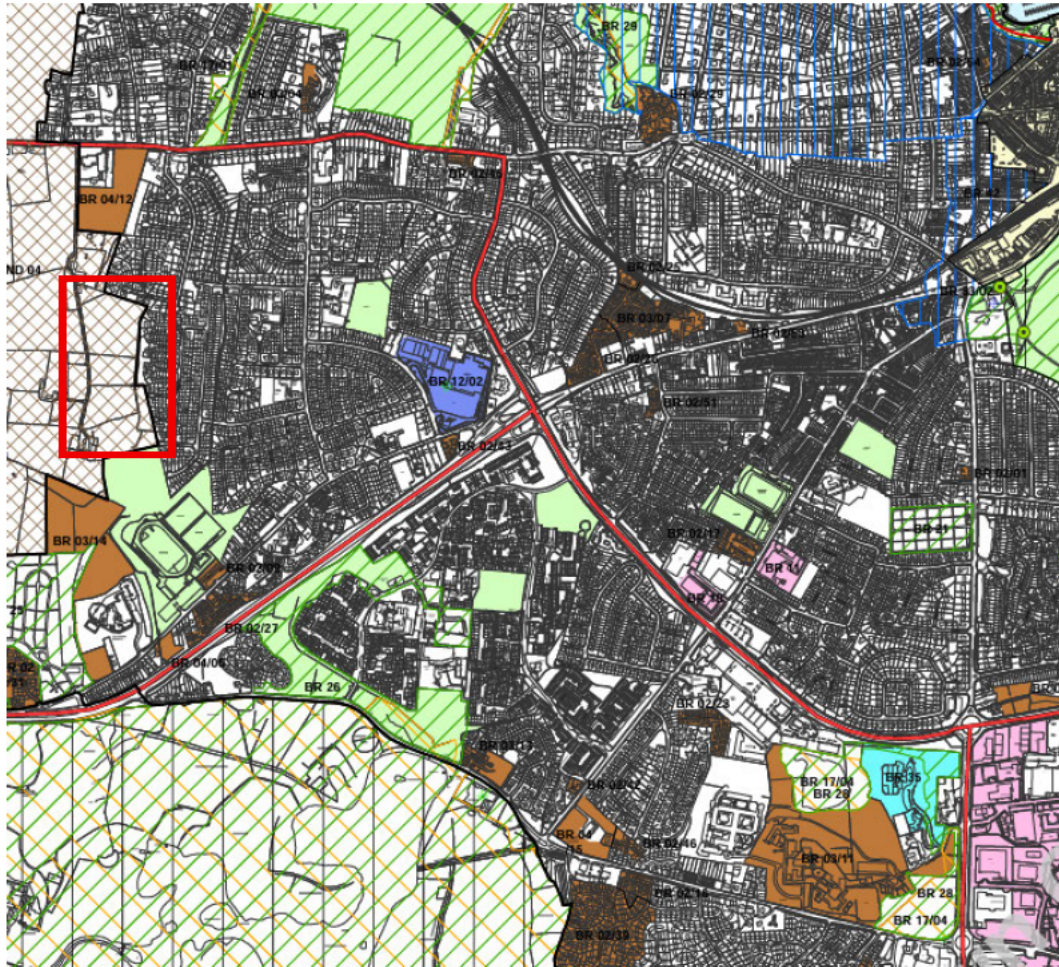
The modelling concluded that to achieve the Council's 'success' scenario of 9,375 jobs by 2032 would necessitate a population increase of 25,318 which equates to 13,372 households. This gives a total new dwelling requirement of 14,189 over the Plan period (or an average of 946 dwellings per annum).



Aerial image of western side of Bangor with limited scope for expansion given extent of existing housing already built out

We **disagree** with the above strategy as it is considered that to deliver the required housing a greater allocation should be allocated to Bangor. Bangor has the capabilities to accommodate additional housing growth and the Council should revisit the settlement limits and identify additional lands to be zoned for housing.

It is considered that the Council should investigate the potential for additional lands along the western edge of the existing settlement limit of Bangor to focus additional housing close to public transport links and in proximity to employment lands.



Extract from BMAP showing the western edge of the settlement limit of Bangor

### **Monitoring Criteria and Review Process**

There is a statutory requirement for the Council to undertake an annual monitoring report – Section 21 Planning Act (NI) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (NI) 2015.

The draft Plan Strategy states that in accordance with the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council's annual monitoring report will focus on the following indicators:

- a Housing land supply;
- b Number of net additional housing units built;
- c Supply of land for economic development purposes; and
- d Other issues the Council deem to be relevant to the implementation of the LDP.

We broadly support the monitoring indicators set out in the technical paper, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period.

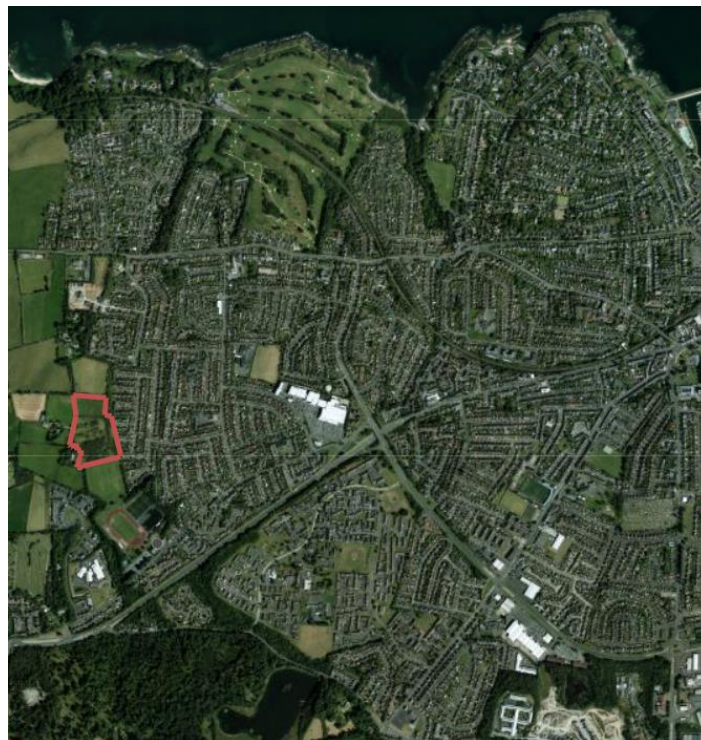
However, projected housing figures and other relevant policies specified above should be amended as required to enable accurate monitoring of the plan. One of the key objectives is to protect and sustain the role of local and small towns so they act as local centres for housing and community services. This requires a realistic provision of housing to enable Bangor to grow and to effectively function as intended.

### **Housing Land Availability in Bangor**

Overall, it is considered that there are limited land opportunities within the settlement limit, given that the majority of lands within Bangor are committed, or unavailable for housing. Therefore, it is evident that more lands to accommodate future growth within the next plan period will be required and lands that are readily available for housing development be considered in order to aid housing delivery within the settlement.

### **Proposed site for inclusion within the settlement limits of Bangor**

We draw to your attention the attached parcel of land (please refer to Appendix 1) for inclusion within the settlement limit of Bangor in the forthcoming Local Development Plan (LDP), which could be utilised to accommodate future growth.

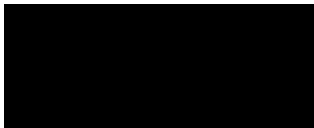


The lands are approximately 4.2 hectares and are located to the west of Bangor and to the north of the Belfast Road. Access to the site is available from existing residential streets to the east leading through to the Belfast Road. The rationale for the inclusion of the site is as follows;

- The eastern boundaries of the site currently abut the settlement limit of Bangor with existing housing development located to the east of the subject lands;
- Inclusion of this site within the settlement limit will not result in urban sprawl and will naturally round off the settlement limit with existing built form already evident further to the west
- The lands are predominately flat which are suitable for future development;
- There are no physical or environmental impacts that could preclude future development of the site;
- The lands can be easily accessed
- The immediate context is predominately residential in character.
- Existing open space and recreational facilities close by.

On this basis, we would encourage the Council to consider our client's lands as being suitable lands for the inclusion within the new settlement limit of Bangor. We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as preparation of the LDP progresses. We would also note that we wish to be heard orally and participate in the upcoming Draft Plan Strategy hearing.

Yours Sincerely,



Mark Hanvey  
**Gravis Planning**

**Appendix 1**  
**Suggested site for inclusion within the Bangor Settlement Limit**

