

MAIN QUESTION

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Are you responding as an individual?

No

+ ADD TO ANALYSIS

Are you responding on behalf of an organisation?

Yes

+ ADD TO ANALYSIS

Organisation and Job Title (if applicable):

Turley

+ ADD TO ANALYSIS

Are you an Agent responding on behalf of a client?

Yes

+ ADD TO ANALYSIS

Client Name, address (if applicable):

The Gibson Family

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

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.

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.

+ ADD TO ANALYSIS

Soundness of the Plan

No

+ ADD TO ANALYSIS

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

See attached report.

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test P1 Comments

No answer

+ ADD TO ANALYSIS

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

Yes

+ ADD TO ANALYSIS

Test P2 Comments

No answer

+ ADD TO ANALYSIS

P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal?

Yes

+ ADD TO ANALYSIS

Test P3 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test P4 Comments

No answer

+ ADD TO ANALYSIS

Consistency Tests

No

+ ADD TO ANALYSIS

Test C1 Comments

See attached report.

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test C2 Comments

No answer

+ ADD TO ANALYSIS

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

No

+ ADD TO ANALYSIS

Test C3 Comments

See attached report.

+ ADD TO ANALYSIS

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?

No

+ ADD TO ANALYSIS

Test C4 Comments

See attached report.

No answer

+ ADD TO ANALYSIS

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

No answer

+ ADD TO ANALYSIS

draft Habitats Regulations Assessment(HRA)

No answer

+ ADD TO ANALYSIS

Equality Impact Screening Report

No answer

+ ADD TO ANALYSIS

Rural Needs Impact Assessment

No answer

+ ADD TO ANALYSIS

Please add any additional comments

No answer

Example tag 1 +

Example tag 2 +

+ ADD TO ANALYSIS

Coherence and Effectiveness Tests

No

+ ADD TO ANALYSIS

Test CE 1 Comments

See attached report.

+ ADD TO ANALYSIS

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

No

+ ADD TO ANALYSIS

Test CE 2 Comments

See attached report.

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test CE 3 Comments

No answer

+ ADD TO ANALYSIS

CE 4 It is reasonably flexible to enable it to deal with changing circumstances?

No

+ ADD TO ANALYSIS

Test CE 4 Comments

See attached report.

+ ADD TO ANALYSIS

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

See attached report.

+ ADD TO ANALYSIS

Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy?

Ards & North Down draft Plan Strategy

Representation on behalf of the Gibson Family

Bangor

March 2026

Turley

Contents

Executive Summary	i
1. Introduction & Background	1
2. Legislative & Compliance Tests	2
3. Part A – Context & Vision	4
4. Part B – Strategic Approach – Growth Strategy	8
5. Part C – General Policies	29
6. Part D – Strategic & Operational Topic Policies	31
7. Part E – Monitoring & Review	33
8. Accommodating Growth in Bangor	34
Appendix 1: POP Representation	
Appendix 2: Housing Completions Analysis	
Appendix 3: Housing Land Supply Analysis	
Appendix 4: Bangor: Constraint Mapping	

Client

The Gibson Family

Our reference

04392

16 March 2026

Executive Summary

Representation on behalf of the Gibson Family – Ards & North Down draft Plan Strategy

1. This submission, prepared by Turley on behalf of the Gibson Family, provides a comprehensive response to the Ards & North Down Borough Council's draft Plan Strategy (dPS). The Gibson family own land adjacent to the current development limit at Green Road, Bangor.
2. The representation acknowledges positive elements in the Council's approach, such as the shift to an employment-led housing strategy and the extension of the plan period to 2032, but also identifies substantial concerns regarding the plan's soundness, particularly around its approach to housing land supply, phasing, and alignment with regional strategies.

Key Strengths and Welcome Changes

3. **Employment-led Housing Strategy:** The Council's decision to integrate housing and employment strategies, moving away from rigid Housing Growth Indicators (HGIs), is commended as a progressive, ambitious approach that better reflects the needs of the Borough's economy and population.
4. **Extension of Plan Period:** The plan period's extension from 2030 to 2032 is welcomed, albeit with the recommendation that a longer horizon (at least to 2035) would be more effective in securing continuity of land supply and maximising the benefits of the planning process.
5. **Recognition of Local Context:** The dPS's Borough profile accurately highlights key challenges, such as an ageing population, high quality of life, commuting patterns, and infrastructure issues. The alignment of the LDP Vision with the Community Plan is also supported.

Principal Concerns and Critique

6. **Reliance on Unreliable Housing Sites:** The Council's continued dependence on long-standing, smaller, and often unreliable housing sites is questioned. The submission provides a detailed review of the housing land supply and recommends identifying additional 'new' land to support the Council's employment-led growth strategy.
7. **Phased Release of Housing Land:** The proposed phasing mechanism for new housing land is regarded as unnecessary and potentially counterproductive. Concerns include:
 - Perpetuation of unsustainable development patterns.
 - Failure to address housing affordability pressures and to support the creation of 7,500 new jobs by 2030, due to constraints on labour force growth.
 - Risk of overreliance on windfall and urban capacity sites, which may not deliver at the required scale or pace.

8. Short Plan Horizon: The plan's effective horizon is too short, with more than half the plan period elapsed before adoption is likely. This creates a backlog in housing delivery and risks the plan becoming outdated upon adoption, undermining its coherence and effectiveness.
9. Inadequate Response to Regional Context: The dPS is criticised for insufficiently addressing the Regional Development Strategy's requirement for a coherent Belfast Metropolitan Area (BMA) approach and for not adequately considering Belfast's housing delivery shortfall and the complementary roles of Bangor and Newtownards.

Soundness Issues Identified

10. The representation systematically evaluates the dPS against statutory soundness tests, concluding that the plan is currently unsound for the following reasons:

Consistency Tests:

11. C1: Failure to fully account for the Regional Development Strategy's BMA planning requirements.
12. C3: Failure to take account of policy and guidance issued by the Department insofar as the LDP has not been prepared quickly.
13. C4: Insufficient regard for Belfast's lagging housing delivery and the opportunity for Bangor and Newtownards to support wider BMA growth.

Coherence and Effectiveness Tests:

14. CE1: Lack of logical flow in the phased housing land release approach, despite recognising the housing-employment relationship.
15. CE2/CE4: Unrealistic plan period and inability to adapt to changing circumstances, especially given current adoption trajectories.

Detailed Policy Commentary

16. Housing Allocation and Delivery: Analysis of housing completions reveals a significant shortfall compared to required delivery rates. The submission advocates for a longer plan period and additional allocations to principal settlements, particularly Bangor, to address this gap.
17. General Policies: Several operational policies are critiqued for lack of clarity, unnecessary duplication, or inflexibility (e.g., amenity impacts, parking requirements, planning agreements). Recommendations include streamlining policy wording and ensuring developer contributions are directly linked to development impacts.
18. Design and Affordable Housing: Concerns are raised about overly prescriptive design criteria that may stifle innovation, inflexible affordable housing definitions and requirements, and ambiguous terms that could hinder effective policy implementation.

19. Monitoring and Review: While ongoing monitoring is essential, it should not substitute for a robust, future-proofed LDP at adoption. The plan's short horizon and risk of immediate obsolescence are highlighted as critical weaknesses.

Recommendations for Improvement

20. Extend the plan period to at least 2035 (preferably 2040) to ensure the LDP remains relevant, delivers on housing and employment targets, and provides a clear break from legacy planning frameworks.
21. Reconsider the necessity and appropriateness of the phased approach to housing land release, especially given the advanced stage of the plan period and the need for accelerated delivery.
22. Direct additional housing land to principal settlements to align with planned employment growth and address identified supply shortfalls.
23. Clarify and, where appropriate, streamline general and topic-specific policies to provide certainty for applicants, decision-makers, and stakeholders.
24. Ensure monitoring and review mechanisms are robust but not a substitute for sound plan-making at the outset.

Conclusion

25. This representation welcomes the Council's ambition and integrated approach but urges significant amendments to ensure the draft Plan Strategy is found sound. The principal recommendations focus on extending the plan period, addressing housing delivery shortfalls, and avoiding unnecessary phasing mechanisms. By adopting these changes, the Council can better secure the Borough's sustainable growth objectives, support economic development, and provide for the housing needs of current and future residents.
26. We look forward to learning of the Council's consideration of this representation in its response, when published and, as necessary, participating in a future Independent Examination (IE).

1. Introduction & Background

- 1.1 Turley submits this representation on behalf of the Gibson Family and welcomes the opportunity to return comments on the Ards & North Down Borough Council draft Plan Strategy (dPS).
- 1.2 The Gibson Family own land in the Green Road area of Conlig/Bangor. They have sold zoned land to a local housebuilder in the past and currently own residual land that was considered positively by the Department during the BMAP process and recommended for inclusion in a Short Term Land Release by the Planning Appeals Commission (PAC).
- 1.3 The Gibson Family welcome this opportunity to respond to the Council's invitation to join the debate on the key issues of strategic significance which are likely to influence the direction of future development within the Borough, ultimately with a view to achieving zoning of its remaining land holding.
- 1.4 The structure of the submission is as follows:
 - **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests;
 - **Chapter 3:** Details our representation to the dPS Context and Vision (Part A);
 - **Chapter 4:** Details our representations to the dPS Strategic Approach – Growth Strategy (Part B);
 - **Chapter 5:** Details our representations to the dPS General Policies applying to all development (Part C);
 - **Chapter 6:** Details our representations to the dPS Strategic and Operational Topic Policies (Part D);
 - **Chapter 7:** Details our representations to the dPS proposals for Monitoring and Review (Part E);
 - **Chapter 8:** Sets out our analysis of how growth can be accommodated in Bangor.
- 1.5 By way of background, we would also like to draw your attention to the submission made in 2019 in response to the Preferred Options Paper (POP), at Appendix 1.

2. Legislative & Compliance Tests

- 2.1 In preparing their Draft Plan Strategy (dPS), the Council is required to adhere to the provisions of the Planning Act (Northern Ireland) 2011 ('Act') and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').
- 2.2 We welcome the Council's decision to re-run the dPS consultation period due to the ambiguity around the final date for representations in December 2025, which arose as a result of the timing of the Belfast Gazette advertisement. Addressing this issue will help ensure that the LDP is capable of passing Procedural soundness test P4.
- 2.3 Whilst not particularly relevant to the focus of this representation, we note that an updated version of the Strategic Planning Policy Statement (SPPS) has been issued by the Department in the period since the dPS was prepared and look forward to understanding how this updated strategic policy context will be integrated into the plan-making process.
- 2.4 The keystone of the local development plan system is the principle of 'soundness'. Section 10(6) of the 2011 Act notes that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:
- (i) whether it satisfies the requirements of Sections 7 and 8 or, as the case may be, Sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
 - (ii) whether it is sound.
- 2.5 The 2011 Act does not define the meaning of 'soundness'. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of 'showing good judgement' and 'able to be trusted'.
- 2.6 Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:
- (i) how the development plan document (DPD) has been produced;
 - (ii) the alignment of the DPD with central government regional plans, policy and guidance; and
 - (iii) the coherence, consistency and effectiveness of the content of the DPD.
- 2.7 DPPN 6 advises that 'soundness' involves testing the principles, content and preparation process of the DPD against a list of key criteria. DPPN 6 then sets out a number of procedural (P1-P4), consistency (C1-C4) and coherence and effectiveness (CE1-CE4) tests which '...aim to provide a framework to assess the soundness of the DPD, whilst taking account of all relevant procedural, legislative and policy considerations'.

- 2.8 Specifically, Test CE1 requires the DPD to ‘set out a coherent strategy from which its policies and allocations logically flow’ and to ensure that it is consistent with the Plan Strategy.
- 2.9 Test CE2 also requires that ‘the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base’.
- 2.10 For the reasons explained further below, whilst the dPS and, in particular, it’s integrated approach to the employment and housing strategies is welcomed, aspects of the plan render it unsound for Consistency and Coherence/Effectiveness reasons.
- 2.11 The key considerations which are implicit in judging the soundness of the LPP, include the extent to which:
- the LPP can achieve its own vision and strategic objectives without the allocation of an appropriate amount of ‘new’ land in places consistent with its Growth Strategy;
 - reliance upon existing housing commitments, particularly those which have yet to deliver homes, or are not delivering at pace, will affect achievement of the plan housing strategy, with knock on effects for employment and regeneration;
 - the plan should look beyond the end of its plan period to ensure continuity of housing land supply.

3. Part A – Context & Vision

Borough Profile

- 3.1 The following aspects of the Council’s profile of the Borough resonate with our own analysis:
- the high quality of life available to residents of the Borough;
 - the ageing population and the implications of this for the future of the local economy and housing market;
 - the fact that many residents in the Borough travel outside for work, and the implications of this for transport infrastructure and for local employment opportunities, particularly for young people;
 - the distinctive role and function of each of the principal settlements in the Borough, with the largest, Bangor, having been honoured with City status;
 - the issues, not unique to the Borough, around sewerage and water infrastructure.
- 3.2 The Gibson Family welcome the acknowledgement at para 1.116 that some of these issues require collaborative approaches and commitments to address. The family welcome the opportunity to highlight, through this and previous submissions, that they and their partners stand ready to play their part in meeting housing needs in a sustainable and beneficial way to existing and future residents of the Borough.

Vision & Objectives

- 3.3 We note the alignment between the LDP Vision and that of the Community Plan, with the Council’s vision being that by 2032:
- ‘Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live.’*
- 3.4 In terms of prosperity and vibrancy, we would simply wish to emphasise the importance of supporting the delivery of the housing needed to achieve the economic ambition of the Council and the vibrancy which additional population growth should bring to the Borough’s town and city centres.
- 3.5 With that in mind, we note the social, economic, environmental and infrastructure objectives of the LDP and concur with the Council that these are often cross cutting in nature. For example, achieving the stated social objectives, including providing sufficient land for housing, will support the economic objectives of encouraging growth and attracting inward investment.

Plan Period

- 3.6 We welcome the Council’s decision to extend the end date of the plan from 2030, as proposed at Preferred Options Paper (POP) stage, to 2032, however, we remain concerned that the plan horizon is still too short and it should be extended to at least 2035.
- 3.7 The Council’s latest LDP timetable (May 2024), published before the reset of the dPS public consultation, is as follows:

Figure 3.1: A&ND BC LDP Timetable



- 3.8 The Council is estimating that the Plan Strategy will be adopted, after Independent Examination, around two years (24 months) after its publication in draft. Even before the consultation reset, this is a very optimistic outlook based upon the equivalent programmes for the other NI Plan Strategies which have been adopted to date. As can be seen from the table below, the average time taken from publication of draft Plan Strategy to adoption is 55 months.

Table 3.1: Time Taken to Adopt Plan Strategies Post Publication in Draft

Council	Draft	Adoption	Time (Months)
FODC	October 2018	March 2023	53
Belfast	September 2018	May 2023	56
Antrim & Newtownabbey	July 2019	July 2025	72
Derry City & Strabane	September 2020*	July 2025	58
Lisburn & Castlereagh	November 2019	September 2023	46
Mid & East Antrim	October 2019	October 2023	48
AVERAGE			55

- 3.9 Even if it took the Council four years (48 months) to achieve adoption of the Plan Strategy – equalling the quickest of the other plans - this would see the Plan Strategy adopted in January 2030.

3.10 Notably none of the Councils that have adopted Plan Strategies have yet to publish Local Policies Plans (LPP) for consultation. The estimated best-case timescales for the earliest LPPs are set out below:

Table 3.2: Anticipated Timescale for Draft LPPs

Council	Draft Anticipated	Time from Plan Strategy (Months)
FODC	October 2026	43
Belfast	May 2026	36
Antrim & Newtownabbey	March 2027	20
Mid & East Antrim	March 2027	42
Derry City & Strabane	July 2027	24
Lisburn & Castlereagh	September 2027	48

3.11 Even if it takes the 15 months from adoption of the Plan Strategy, as presently forecast by the Council, this will see the draft LPP published in May 2031. The Council’s timetable suggests a three-year period from then to adoption of the LPP, which would be May 2034. This would be quicker than any other Council before it. Even with the potential for Independent Examination by either the Planning Appeals Commission or an alternative person appointed by the Department, it appears optimistic. 2035 is perhaps more realistic but time will tell.

3.12 The clear potential for the second part of the Plan to be adopted two or three years after its stated end date, must have consequences for its outlook and housing strategy. In order to deliver some benefit from the significant investment in plan-making and avoid the potential for the plan to be out of date before it is even adopted, it should look ahead to at least 2035, if not 2040.

3.13 As presently drafted the dPS fails several of the Consistency, Coherence and Effectiveness soundness tests:

C3: The council took account of policy and guidance issued by the Department.

3.14 Is not met because the Council has not taken account of paragraph 5.25 of the SPPS (or Diagram 2) which requires the Plan Strategy to be published quickly (anticipated within 2 years). This fundamentally affects the plan period and time horizon of the plan.

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

3.15 Is not met because whilst the vision and core strategy of integrating housing and employment growth is sound, the time period within which this strategy is delivered is inappropriate given the current trajectory of the plan making process. This affects the policies (such as the phasing policy SGS6) and housing allocation SGS5.

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

- 3.16 Is not met because the plan period for the strategy and the associated policies and allocations are unrealistic and inappropriate considering the evidence of the current trajectory of the LDP towards adoption.

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

- 3.17 Is not met because for the reason stated above, it will not be able to deal with changing circumstances.

4. Part B – Strategic Approach – Growth Strategy

SGS 1: Spatial Growth Strategy & SGS 2: Settlement Hierarchy

- 4.1 As in our POP response, we would remind the Council of the importance of continuing to acknowledge the role of Bangor as part of the Belfast Metropolitan Urban Area (BMUA). Indeed, in this context it is important to note that Paragraph 4.18 of Technical Supplement 2 of the Belfast Plan Strategy points to the possibility of Councils such as Ards and North Down taking some growth from Belfast in the event that it can't accommodate its own growth.
- 4.2 Whilst it is accepted that Newtownards also has a BMA function - the RDS (para 3.86) identifies it as a key commuter town to Belfast due to its proximity and accessibility to the city, giving it the potential to cluster with the BMUA – in contrast to Bangor, it is outside the actual BMUA, the major conurbation in NI, where Bangor plays an important complementary role (RDS para 3.41). This distinction could be better reflected in the Settlement Strategy.
- 4.3 In a similar context, the Antrim and Newtownabbey Borough Council Plan Strategy identifies Metropolitan Newtownabbey as Tier 1 in the Settlement Hierarchy, with Antrim, a 'major hub town' as Tier 2. That draft Plan Strategy includes a Spatial Growth Strategy which identifies both as a 'focus for core growth'.
- 4.4 The key inter-related strands of the RDS 2035 for Bangor are:
- i. Its role within the BMUA insofar as it functions as a dormitory settlement with significant commuting to Belfast.
 - ii. The opportunity to promote waterfront regeneration within its town centre.
 - iii. The need to extend its employment and retail base to serve its large residential catchment.
- 4.5 Bangor was awarded city status in May 2022 as part of the Platinum Jubilee Civic Honours. Assuming city status further consolidates Bangor as the major urban centre within the Ards and North Down Borough. City status will also have a positive impact in terms of attracting investment to support future growth, regeneration and development. It is imperative that future development plans support economic development and regeneration while also catering for existing resident needs and accounting for key trends in the demographic profile of the city.
- 4.6 Table 8 in Appendix 3 of Technical Supplement 1 confirms that Bangor is over twice as large as Newtownards. This, in Borough, view of Bangor should be supplemented by an understanding of the scale of Bangor in the context of the larger settlements in Northern Ireland. Table 4.1 below shows that Bangor is the fifth largest settlement in Northern Ireland

Table 4.1: Census 2021 person and household estimates for settlements

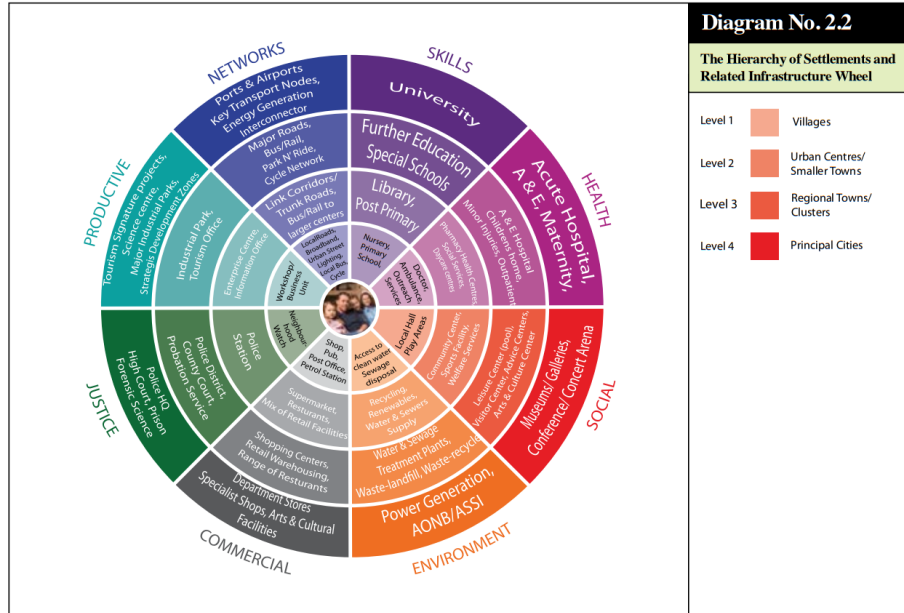
Settlement	Population	Households
Belfast City	291,386	126,925
Derry City	84,884	35,554
Craigavon Urban Area	72,721	29,331
Metropolitan Newtownabbey	67,112	28,410
Bangor	64,122	27,859
Metropolitan Castlereagh	59,198	25,467
Lisburn City	51,447	21,321
Metropolitan Lisburn	32,368	12,696
Ballymena	31,308	13,287
Newtownards	29,591	12,984
Newry	28,026	11,065
Carrickfergus	27,886	12,132
Antrim	25,464	10,766
Coleraine	24,560	10,622
Omagh Town	20,353	8,721
Larne	18,794	8,624

Source: NISRA CT0046: Person and household estimates for settlements

- 4.7 Whilst both Bangor and Newtownards fall within the same NISRA class of 'Band C - Large Town (population 18,000+)', Bangor clearly has a scale and, therefore, critical mass of population and households at the upper end of Northern Ireland's settlements.
- 4.8 Table 6 in Appendix 1 of Technical Supplement 1 notes that '*whilst Bangor has been bestowed City status, and as it is the largest settlement in the Borough the term Principal Settlement will be used to reflect the honour bestowed to avoid confusion as it does not contain the expected level of infrastructure services of the highest settlement tier within the RDS.*'
- 4.9 It is accepted that Bangor does not currently have all of the infrastructure or services to be classed as a Tier 4 Principal City as per the RDS Hierarchy of Settlements and Related Infrastructure Wheel (Figure 4.1, below), however, the Council's ambition certainly includes some of the features of this level – not least the Bangor Waterfront Belfast Region City Deal Flagship Project – a 'productive' tourism signature project which the Council itself rightly describes as 'ambitious', aiming to 'help re-establish Bangor as a thriving city and prime visitor attraction in Northern Ireland.' [Introduction - Ards and North Down Borough Council](#).

4.10 The classification of Bangor as a Principal Settlement does not particularly communicate this ambition.

Figure 4.1: RDS Hierarchy of Settlements and Related Infrastructure Wheel



Source: Strategic Investment Board Limited, 2008

4.11 Furthermore, using Table 6 in Appendix 1 of Technical Supplement 1 and reviewing the Appendix 4 Settlement Evaluations confirms there are similarities in the types of services and infrastructure available in Bangor and Newtownards but does not highlight their relative scales, which are a function of their respective size and critical mass.

4.12 To properly reflect the vision and ambition of the Council and the RDS, for what it can become, beyond what is presently is, the position of Bangor should be recognised as at a higher level in the settlement hierarchy than Newtownards. This need not come at the expense of Newtownards in the context of housing or employment allocations, rather it simply reflects the respective current and planned scales, functions and ambitions.

4.13 As drafted the dPS fails soundness test C1 because the Council did not properly take into account the Regional Development Strategy insofar as it requires a coherent approach to the planning of the Belfast Metropolitan Area (BMA) as a whole.

SGS 3: Strategic Allocation of Economic and Industrial Land

4.14 Given the important connection between the delivery of jobs and homes, we support this policy.

4.15 The dPS proposes to allocate 15,608 new homes to meet housing need and support job creation over the plan period (2017 -2032, 15 years), under Policy SGS 4: ‘Strategic Housing Allocation’. The justifying text references the consideration of several housing growth scenarios within the underpinning evidence base, with these explained in

‘Technical Supplement 3 Housing’. It confirms that the approach taken has been to *‘adopt an employment-led approach to setting the strategic housing requirement.’* It proceeds to acknowledge that: *‘There is a complex inter-reliance between employment growth – population growth – and housing growth.’*¹ Further consideration is given to the justification and underlying evidence supporting the approach taken in the dPS in this regard, within this note.

- 4.16 It is also observed that the dPS acknowledges the challenges relating to worsening affordability, observing: *‘House prices in the Borough remain relatively high, and this can cause affordability issues, particularly for young people.’*² Separate consideration is given to the importance of this consideration in planning positively for housing within the LDP, including the impact this has on the potential spatial distribution of new housing provision.

Alignment between job growth and housing need

Planning positively for economic growth

- 4.17 The dPS Plan proposes, through Policy SGS 3 ‘Strategic Allocation of Economic and Industrial Development Land’ to allocate a minimum 25 hectares of land for economic development purposes. In justifying this provision, the Plan references the commissioned *Employment Land Review* (ELR, 2019) and the *Employment Land Monitor* (April 2022 and updated in 2023).
- 4.18 This evidence identified that out of the 203.23 hectares zoned through the Ards and Down Plan (2015) and the draft Belfast Metropolitan Area Plan (2015), 63 hectares remains undeveloped.
- 4.19 The additional need reflects work undertaken to ensure alignment with the Council’s *Integrated Tourism, Regeneration and Economic Development Strategy (Integrated Strategy or IRTRDS)*, which sets out the growth aspirations for the Borough up until 2026. The anticipated growth rates have been extrapolated to 2030 and then 2032 to align with the Plan period. In the case of the more ambitious ‘strategy success’ scenario this suggests job growth over the plan period of some 9,375 jobs, which is preferred and to which the Plan aligns. It is noted that the job growth figures to 2030, which are used in the ELR, suggest 4,500 jobs under the baseline and 7,500 jobs under the ‘strategy success’ scenario, translating into a need for between 12.6 and 20.5 ha of employment land. It is evident that in allocating an additional 25 ha, on top of the remaining land supply, that the Plan provides the potential to accommodate stronger job growth than either of these referenced scenarios if investment occurs and commercial floorspace is progressed across the whole potential supply.
- 4.20 The dPS cites the *‘highly ambitious Belfast Region City Deal [BRCD]’* signed in December 2021, which it confirms represents a significant package of investment aimed at delivering: *‘Inclusive economic growth that delivers more and better jobs...’*.

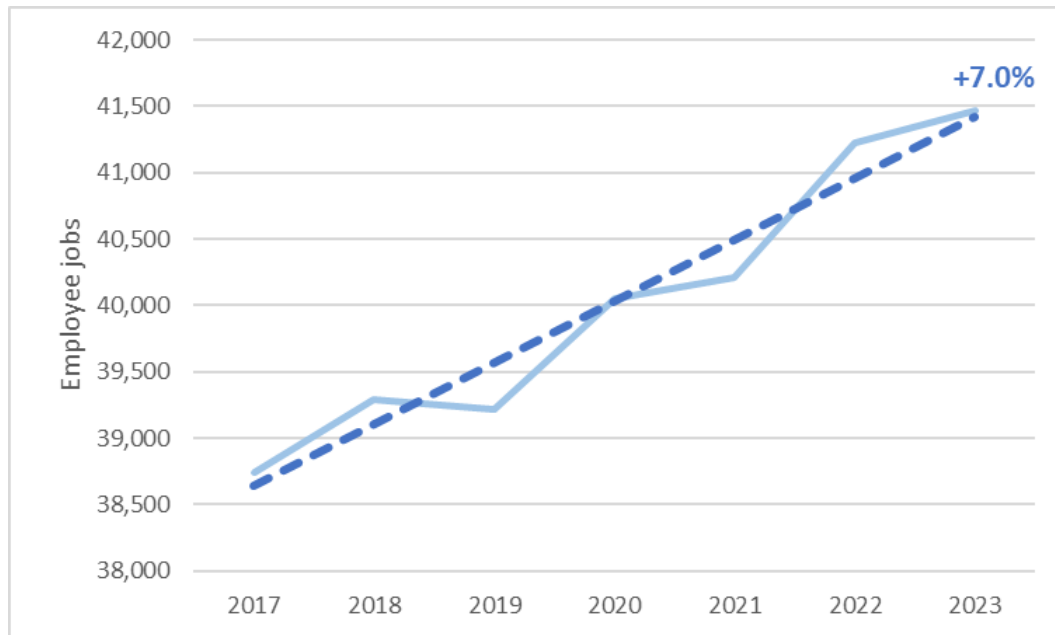
¹ Ards and North Down Local Development Strategy (2025), paragraphs 2.45 and 2.46

² Ards and North Down Local Development Strategy (2025), paragraph 1.115

Referencing the intent for the ‘substantial financial commitment’ to ‘generate up to 20,000 jobs as it is delivered over the next 10-15 years’³.

- 4.21 Looking at Ards and North Down the latest available data shows that there has been a steady and strong level of job generation over the plan period to date. Figure 4.2 shows the annual change in employee jobs from the start of the plan period, confirming a 7% growth and an absolute increase of some 2,700 jobs over 6 years.

Figure 4.2: Ards and North Down Employee Jobs 2017 – 2023



Source: NI Business Register and Employment Survey

- 4.22 The Council recently commissioned a ‘Supplementary Employment Land Review’, which was published in 2025. This sought to validate the conclusions of the 2019 ELR and specifically consider the extent to which the forecast job growth (the 9,375 jobs over the plan period) was reasonable and its alignment with the amount of employment land proposed for allocation. The study did this by looking at existing pipeline projects and investments which would be expected to deliver job growth over the Plan period.
- 4.23 The study identified a sufficient pipeline of potential employment generating projects. Indeed, it identified, based on 20 ‘direct interventions’ along with calculated indirect growth arising from a number of these interventions, the potential to generate 10,395 full-time equivalent (FTE) jobs. A 10% displacement factor was applied to net this down to align with the total forecast of 9,375 to validate the assumed level of growth.

The potential for higher than forecast employment growth

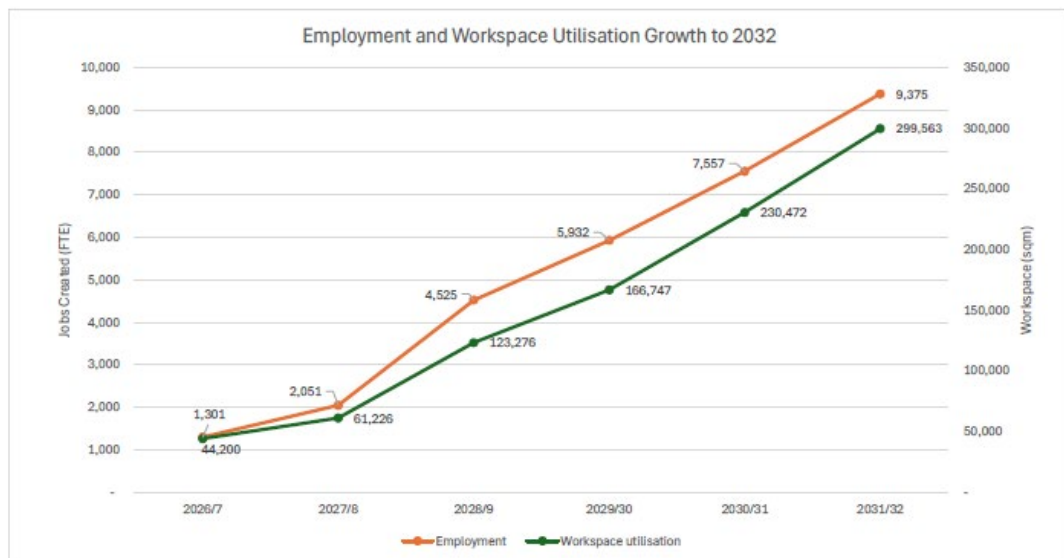
- 4.24 It is observed that it is reasonable to interpret the findings of the 2025 Supplementary ELR as indicated that there is a good possibility that even stronger levels of

³ Ards and North Down Local Development Strategy (2025), paragraphs 1.84 and 1.85

employment generation could be expected, therefore exceeding the Draft Plan’s target.

- 4.25 The forecast potential to create over 10,000 jobs across 20 projects does not account for the potential for jobs to be created elsewhere across the borough. There is a recognition in the study that a growing population will itself be an economic driver. This is important as it is correct to expect that demands arising from additional people will generate jobs in sectors of the economy not picked up within the specific interventions considered. This would include, for example, jobs associated with additional retail and leisure spend from a growing population as well as those within social infrastructure (schools, health facilities etc...).
- 4.26 The study suggests that the additional jobs forecast could be accommodated within 40.8 ha of employment land. Even against the 63 ha of extant employment land referenced above this suggests a reasonable level of headroom. If this additional land was built out and occupied this itself would contribute further additional jobs.
- 4.27 Finally, the forecasts developed in the study imply that a significant proportion (almost all) of the additional jobs generated would be created post 2026/27. This is shown in the following Figure which is replicated from the study. Where the housing requirement, and underlying demographics, assume growth over the whole plan period any additional job growth which has occurred prior to 2026/27 would already have been absorbed by population change over this period. The result would be a greater potential draw on labour over the remaining years of the plan period to align with this strong job growth.

Figure 4.3: Employment and Workspace Utilisation Growth to 2032



Source: Ards and North Down Supplementary Employment Land Review (2025), Jettora

Understanding the implications for housing need

- 4.28 In this context and in considering the relationship with housing the Council commissioned detailed demographic projection modelling work from Edge Analytics.

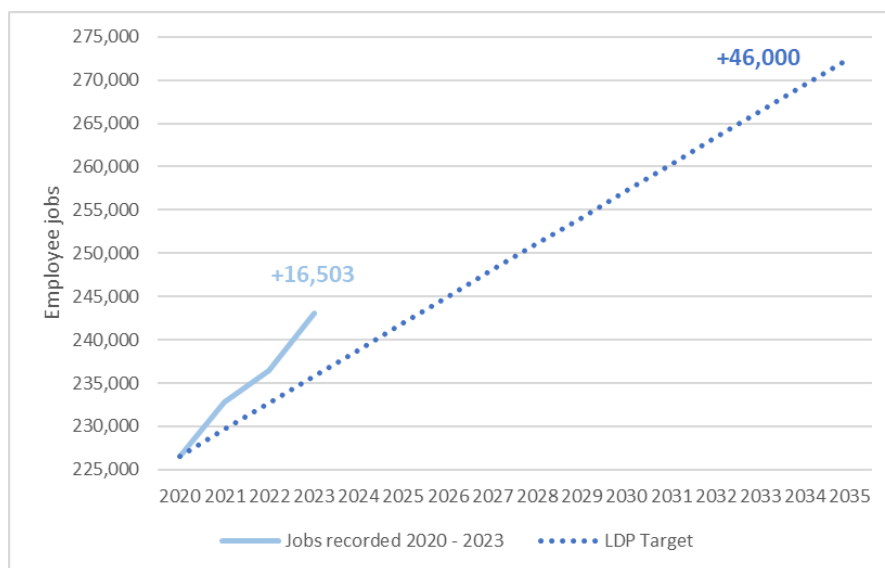
The output of this analysis is presented in a separate technical report and then summarised in a *‘Technical Supplement 3 Housing’*.

- 4.29 This work critically highlights and considers the implications of a projected ageing of the local population. The Local Plan summarises the conclusion of the technical evidence and identifies that to support the identified 9,375 forecast job growth there would need to be a population increase of 25,318, equating to an increase of 13,372 households. In turn this translates into a dwelling requirement of 14,189 homes over the Plan period, or 946 dwellings per annum. To this need a flexibility allowance of 10% has been applied to justify the housing requirement of 15,608 dwellings.
- 4.30 Where the above evidence correctly identifies the important relationships between the changing age structure of the population and labour behaviours it is evident that to sustainably support a stronger economy there would be a direct need to see a parallel stronger growth in population and as a result housing need.

Acknowledging likely housing pressures arising from Belfast’s economic growth

- 4.31 As referenced above the dPS acknowledges the important relationships between Ards and North Down and Belfast, including the planned investment across the Belfast Region.
- 4.32 A review of comparable employment data for Belfast confirms that it has seen considerable success in creating new jobs. The adopted Belfast LDP establishes a target to create 46,000 additional jobs over the plan period (2020 – 2035). This equates to on average circa 3,067 new jobs each year. Over the first three years of the plan period (2020 – 2023) the latest data suggests that just in excess of 16,500 jobs have already been created, equating to an annual average of more than 5,500 jobs each year. This is illustrated in Figure 4.4, below.

Figure 4.4: Belfast employee jobs 2020 – 2023 benchmarked against the LDP target



Source: NI Business Register and Employment Survey, Belfast LDP

- 4.33 The LDP similarly sets a requirement for the provision of new housing, whereby it expects the housing stock to increase by some 31,600 new homes over the same plan period, or an average requirement of 2,107 homes.
- 4.34 A review of the Council's housing monitoring data suggests a less positive picture, with only 2,071 homes built over the first three years, equating to only 690 homes per annum on average.
- 4.35 Following the same logic as the Council's evidence base in considering the alignment of jobs and houses would strongly suggest that there is a likelihood that the strong economic performance of Belfast, coupled with a constrained provision of housing, will be placing additional labour market pressures on surrounding areas such as Ards and North Down. It is important to note in this regard that the borough has historically seen a high net out-commute (to Belfast and other proximate areas), with this recognised in the Edge Analytics modelling⁴.
- 4.36 It is important that the Council provides adequate consideration of this issue as the additional labour-market pressures, if sustained, would generate further housing need pressures alongside those generated by the borough's own growing economy.
- 4.37 As presently drafted the dPS fails soundness test C4 because the Council has had insufficient regard to how Belfast's Local Development Plan is falling behind in its delivery of homes and the opportunity to maximise the complementary role of Bangor and Newtownards within the wider BMA.

The need for an extended Plan period

- 4.38 As noted above, the plan period as set out in the dPS is 2017 to 2032, with needs calculated and planned for over this period.
- 4.39 This results in a position where over 50% of the period has already occurred and the Plan is only looking forward approximately 6 years from the current point in time (early 2026). Recognising the time required to see the two stages of the Plan through to adoption, the reality is that there is a strong likelihood that the remaining time will be used and the LPP will be adopted after the stated end date of the plan.
- 4.40 Looking at housing, one consequence of this is an anticipated significant back-loading of provision and arising deliverability challenges. This recognises that the monitoring of completions reported in the Plan indicates that over the first 5 years of the plan period (2017/18 to 2021/22) only 2,959 homes have been delivered⁵. This represents an average annual delivery rate of 592 homes per annum, some way short of the average annual requirement of 946 homes per annum.

⁴ Ards and North Down – Data Inputs and Assumptions (January 2023), Edge Analytics, paragraph 2.30 observes a commuting ratio of 1.64 has been derived for Ards and North Down, indicating a high net out-commute out of the area to elsewhere in Northern Ireland.

⁵ The Draft Plan states '*a further 2,959 units having been constructed since the start of the Plan period in April 2017 until the end of the monitoring period in March 2022*'. See further analysis at Appendix 2.

- 4.41 Further Housing Land Availability Reports have been published by the Council, with the latest monitoring completions in 2023/24. Adding the two additional years of data (completions of 557 and 407 dwellings per annum respectively) means a total of 3,923 homes have been delivered over the first 7 years of the plan period, an annual average of just 560 homes per annum.
- 4.42 This leaves a residual need for some 11,685 homes (against the plan period requirement of 15,608 dwellings). As a result, there is a requirement to deliver some 1,461 homes per annum over the last 8 years of the plan period. This evidently represents a significant 'step-up' from recent levels of delivery.
- 4.43 In the context of the above, and noting that the Belfast LDP has a plan period running to 2035, there is a strong rationale for extending the plan period to allow for the backlog to be addressed over a longer period of time.

Ensuring the Spatial Growth Strategy aligns employment and housing provision

- 4.44 The approach proposed through the *Spatial Growth Strategy (SGS 1)* is broadly supported and specifically the intent to: *'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.'*⁶
- 4.45 Map 3 of the Draft Plan confirms that the vast majority of strategic employment land allocations are concentrated within the two main settlements of Bangor and Newtownards. Table 1 shows the distribution of the proposed employment land allocations. This identifies that of the remaining developable land this is broadly split between the two settlements, with a slight orientation towards Bangor.

Table 4.2: Strategic Employment Allocations

Site Name	Location	Total Area Zoned (ha)	Total Area Remaining (ha)
Strategic Employment Locations			
Balloo Industrial Estate	Bangor	55.22	4.67
Jubilee Industrial Estate	Newtownards	23.3	3.61
Legacy Zoned Employment Sites			
Newtownards Road	Bangor	17	17
Balloo Road / Newtownards Road	Bangor	28.07	12.15
Clandeboyne Rod	Bangor	1.22	0.23
Bangor Road	Newtownards	5.87	5.87

⁶ Ards and North Down Local Development Strategy (2025), Policy SGS 1

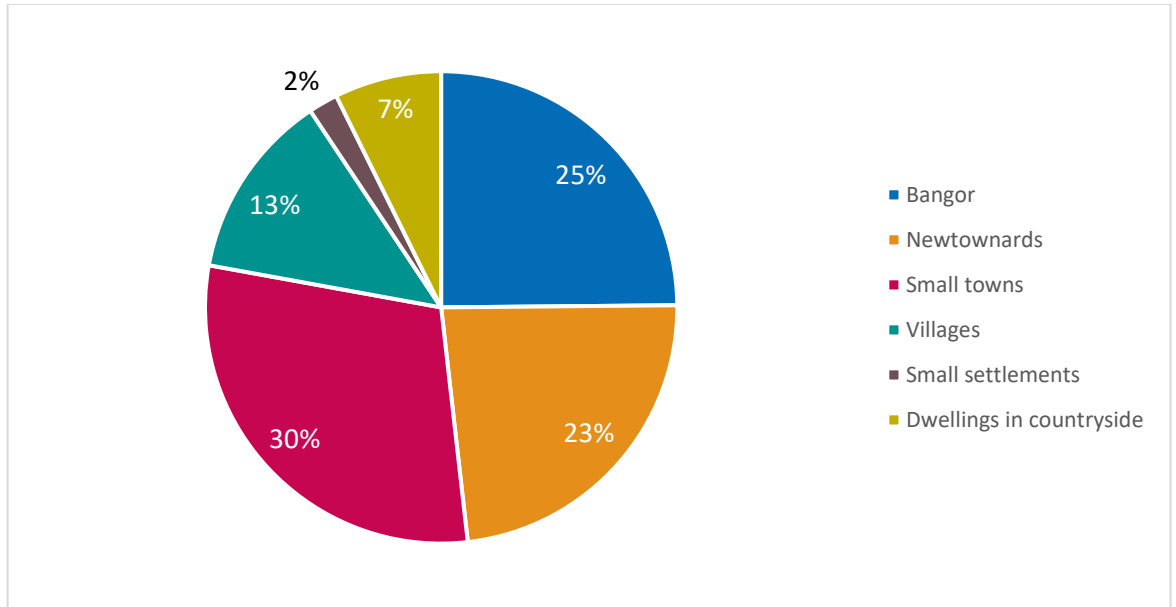
Comber Road (West)	Newtownards	4.51	4.51
Comber Road (East)	Newtownards	8.19	7.21
Donaghadee Road (North and South)	Newtownards	5.04	3.42
South of Belfast Road and East of Milecross Road	Newtownards	2.97	2.97
Comber Road Industrial Estate	Newtownards	10.3	0.18
Donaghadee Road	Newtownards	4.05	0.86
Riverside, Lands south of Comber Bypass	Comber	4.66	0
Total		170.4	62.68
Proportion (%) of total	Bangor	60%	54%
	Newtownards	38%	46%
	Comber	3%	0%

Source Ards & North Down LDS (2025), Table 3

- 4.46 Where the above affirms an expectation that new commercial floorspace will be planned within the two Principal settlements exclusively, it is noted that under Policy SGS 4 the spatial distribution of housing suggests a more modest proportion to the two principal settlements. Table 4 of the dPS confirms the intention to allocate 63% of the housing allocation to the Principal settlements, with the residual distributed across primarily smaller towns and villages. This equates to a 'housing requirement' across Bangor and Newtownards of 7,889 homes over the Plan Period (including an assumption about windfall allowance) but not factoring in the completions which have occurred to date.
- 4.47 The Council's Housing Land Availability Reports provide what appears to be robust and consistent monitoring data back to 2019/20, a five year period with the latest year reported on being 2023/24. However, earlier reports note that there was a degree of inconsistency in how completions data was collected with the 2018/19 being the first to use a new methodology which was more comprehensive in its approach, but also observing that where it sought to retrospectively address earlier weaknesses that it cannot be used to present a reflection of the annual delivery that year. This is unsatisfactory and means using this data source it is not possible to get a full picture of completions consistently over the plan period. However, the data does provide a spatial breakdown for this five year period, in which 2,579 completions were recorded in total. This is illustrated in Figure 4, which shows that over these 5 years and looking just at the proportion delivered in the two principal settlements suggests that the policy expectation of 63% has not been achieved, with 48% or just under half of the total delivered in the two settlements to date. It is noted that the 'small towns' have in

contrast seen a disproportionate level of development, representing 30% of total completions over this period.

Figure 4.5: Spatial distribution of completions 2018/19 – 2023/24



Source: Turley analysis of Ards and North Down Housing Land Availability Reports

- 4.48 It is agreed that there is a strong reason to allow all settlements to see a level of growth and it is important that supply is appropriately identified across the settlement hierarchy. However, where the dPS identifies a ‘shortfall’ in planned housing provision, with the cumulative potential housing supply calculated in Table 7 of the Draft Plan identifying capacity for only 14,319 homes against a requirement for 15,608 homes, it is considered necessary for the majority of additional land to be directed to the two Principal settlements to sustainably support planned job growth and associated housing need pressures.

SGS 4: Strategic Housing Allocation (SHA)

- 4.49 As noted above, the Council’s rejection of an HGI-led approach to establishing its Strategic Housing Allocation (SHA), in favour of an employment-led approach is broadly welcomed as positive and ambitious. The fundamentals of the approach are as per our approach to Belfast when commissioned by Belfast City Council. The need to encourage the in-migration of the working age cohort in acknowledgement of the Borough’s increasingly ageing population with a consequential reduction in working age population is noted.
- 4.50 Plainly it is important to maintain a continuous supply of quality homes in order to achieve the level of employment growth targeted by the Council. Given the likely timescales associated with the adoption of the LPP part of the LDP, as which point ‘new’ land will become available, it is equally important for there not to be a hiatus in the supply of land for new homes.

- 4.51 If, as is suggested above, the effective plan horizon (if not the stated end date) was extended to 2035, or 2040, the extrapolating (rolling forward) the SHA to generate a new total dwelling requirement would increase as per the table below:

Table 4.3: Extrapolated Strategic Housing Allocation (SHA)

	Council 2032	Turley 2035	Turley 2040
New dwelling requirement	14,189	17,027	21,757
10% Flexibility Allowance	1,419	1,703	2,176
Total Housing Requirement	15,608	18,730	23,933
Annual housing requirement	946		

- 4.52 Such an approach is also necessary because it will take several years from the adoption of the plan for a fresh zoning to deliver new homes at any scale. The process of developing a major residential site in Bangor involves several stages from site purchase through design, planning, and construction. It is complex and significant investment required before new homes are available.

SGS 5: Strategic Housing Allocation across settlements

- 4.53 We welcome the Council's approach to the allocation of the SHA across the settlement tiers with the largest proportion of housing (63%) allocated to the Principal Settlements of Bangor and Newtownards at the top of the hierarchy. Within this allocation, Bangor is allocated 57% and Newtownards 43%.
- 4.54 Applying these proportions to the 2035 and 2040 Turley SHAs (Table 4.3), above, results in the following requirements for Bangor and Newtownards.

Table 4.4: Extended Strategic Housing Allocation (SHA)

	Council 2032	Turley 2035	Turley 2040
Bangor	4508	5621	7475
Newtownards	3381	4215	5606
	7889	9836	13081

- 4.55 Draft Plan Strategy Table 6: Strategic Housing Allocation Across Settlements sets out details of what the Council considers to be the Borough's Potential Housing Supply, an extract of which is set out below:

Table 4.5: Principal Settlements: Comparison of Housing Requirement to Supply (to 2032)

	Housing Allocation 2017-2032	Existing Commitments	Urban Capacity Potential	Windfall Allowance	Total Potential Housing Supply	Requirement
Bangor	4508	1072	412	520	2004	2504
N'Ards	3381	3323	486	520	4329	-948

4.56 This suggests that there is a sizeable requirement for Bangor to 2032, whilst Newtownards has a surplus of land, always presuming all sources of identified supply are available and making a housing contribution.

4.57 With an extended plan period in mind, a comparison with the Turley 2035 SHA is set out below.

Table 4.6: Principal Settlements: Comparison of Housing Requirement to Supply (to 2035)

	Housing Allocation 2017-2035	Existing Commitments	Urban Capacity Potential	Windfall Allowance	Total Potential Housing Supply	Requirement
Bangor	5621	1072	412	520	2004	3617
N'Ards	4215	3323	486	520	4329	-114

4.58 This suggests that, again always presuming all sources of identified supply are available and making a housing contribution, by 2035 land supply might be expected to run out in Newtownards around then.

4.59 In reality, we would not expect all sources of identified supply to be available and make a housing contribution. Using the Council's 2023/24 Housing Monitor, we have undertaken a review of the position in respect of existing housing commitments, urban capacity sites and development opportunity sites (Appendix 3) in Bangor. This review has involved reviewing the planning history and visiting each of the identified sites. Our analysis suggests that there is a residual potential for at least 532 homes less than the Council estimate, broken down as follows:

Table 4.7: Analysis of Housing Land Supply

Remaining Potential	Council	Turley
Committed Sites	1013	481
Urban Capacity Sites	221	221* even with no planning history
Development Opportunity Sites	191	191* even with no planning history
Total	1425	893

- 4.60 Applying these figures to the 2035 requirement for Bangor from Table 4.5, above, even on the basis of what would appear to be a large windfall allowance figure (given the potential overlap with urban capacity and development opportunity sites) suggests that there is a very large residual requirement of over 4,000 homes to 2035.

Table 4.8: Calculation of Potential Residual Housing Requirement for Bangor to 2035

	#
Housing Allocation 2017-2035	5621
Committed Sites	481
Urban Capacity Sites	221
Development Opportunity Sites	191
Windfall Allowance	350
Total Potential Housing Supply	1243
Residual Requirement	4378

- 4.61 The data also clearly shows that many of the housing monitor sites are small scale, with an equivalently low yield. There are very few remaining larger sites with the potential to deliver at scale consistently over the next few years. Whilst we appreciate the importance of windfall and urban capacity sites in the context of an overall housing land supply, the LDP’s housing strategy should not over rely on this source of potential supply to the exclusion of larger sites owned by housebuilders or willing landowners which can make a significant and consistent contribution to the City’s housing requirements over the plan period.

SGS 6: Management of Housing Land Release

- 4.62 Notwithstanding the fact that the Plan, by the Council’s own timetable is due to be adopted in six years and only months before its stated end date, by which time housing land availability will be further reduced, SGS6: Management of Housing Land Release proposes to manage the release of housing land across the Borough, by zoning housing land at LPP stage within the Principal Settlements and Small Towns in two phases.
- 4.63 The draft policy notes that Phase 1 housing land will be developed first and will comprise existing commitments and housing zonings within the urban footprint.
- 4.64 Phase 2 housing land will be identified and zoned, at Local Policies Plan stage, to be held in reserve and will comprise:
- retained legacy housing zonings outside the urban footprint without extant residential planning permission; and

- any new housing zonings outside the urban footprint where required
- 4.65 The draft policy advises that Phase 2 lands may be released during the Plan period, if:
- monitoring indicates that there is a need to release Phase 2 sites in order to maintain a 5-year supply of available housing land; or
 - the release of a particular site is required to meet an extreme and localised particular housing need.
- 4.66 It concludes that where neither of these two conditions are met, planning permission for the development of Phase 2 lands will be refused.
- 4.67 Justification and amplification is provided in paragraphs 2.55 to 2.59.
- 4.68 Paragraph 2.55 notes that the Borough has extensive residential commitments (comprising both legacy housing zonings and proposals with extant planning permission) which, together with sites identified through the Urban Capacity Study and the Windfall allowance, make up the majority of the strategic housing requirement for the Borough.
- 4.69 Paragraph 2.56 states that a phased policy approach allows the Council to promote the most sustainable locations for housing development within existing urban areas first, whilst allowing flexibility to respond to changing circumstances over the Plan period and maintain an ongoing supply of housing land to meet the needs of everyone (emphasis added).
- 4.70 The Sustainability Appraisal Report (SAR) considers this policy on pages 32 and 33. It confirms that no reasonable alternatives were identified, going on to say that *‘the approach of ‘plan, monitor, manage’ is well established through the RDS and the SPPS (paragraph 6.124 and paragraphs 6.140-141). The SPPS specifically requires at p. 6.124 that LDPs should “provide for a managed release of housing land, in line (with) a ‘plan, monitor and manage’ approach”. (emphasis added)*
- 4.71 In comparing the option against the Sustainability Objectives, the SAR notes that:
- As the policy aims to develop the most sustainable locations first, i.e. those within urban footprints, there will be increased opportunities for social contact, interaction and overall social cohesion amongst those communities. From these central locations, it is more likely that people will have good, local level connectivity to one another but also to facilities and services, as well as convenient access to local walking and cycling routes, and public transport. These aspects help create a positive, living environment for people, but the approach also ensures a framework for delivery of new housing in the most sustainable way, with specific housing needs able to be accommodated. Minor positive effects are identified for the social Sustainability Objectives 2 and 3.*
- The strength of the approach is most evident against Objective 6, with significant positive effects identified, however the effect on the other economic Sustainability Objectives (Objectives 4 and 5) is negligible. As the policy directs growth toward urban locations where provision of material assets already exists, it aligns to the proximity*

principle, which maintains a much more efficient use of both land and infrastructure. It promotes the reuse of derelict land ahead of settlement expansion into new greenfield sites.

For similar reasons, minor positive effects are also concluded for Objectives 7 and 8 under the environmental pillar of sustainability, because the policy directs growth toward the urban footprints and the most sustainable locations, which helps control the rate at which settlements will spread into greenfield land, whilst making it easier for people to gain access to and opt for other modes of transport to the car.

While the approach will help to avoid unnecessary spread and associated loss of natural resources and biodiversity in the countryside in the short term, with associated short-term positive effects for Objectives 12 and 13, it may not alter the overall amount of land use, there will be probable loss of urban biodiversity and the effects will change to uncertain over the medium and long term as it cannot be predicted how much land will be taken up over the plan period, and when and where it will be taken. Uncertain effects are also found for Objectives 9 and 11. These uncertainties are based on the consolidation of development initially into urban areas, where there could be a risk of increased concentrations of emissions to the air, traffic congestion and potential issues with connecting to NIW mains infrastructure until capacity constraints are overcome – the timescale for which is currently unknown. Overall, the option is considered to be a sustainable option.

4.72 In terms of actual scoring:

Figure 4.6: SAR Scoring

	1. improve health and well-being.	2. strengthen society.	3. provide good quality, sustainable housing.	4. enable access to high quality education.	5. enable sustainable economic growth.	6. manage material assets sustainably.	7. protect physical resources and use sustainably.	8. encourage active and sustainable travel.	9. improve air quality.	10. reduce causes of and adapt to climate change.	11. protect, manage and use water resources sustainably.	12. protect natural resources and enhance biodiversity.	13. maintain and enhance landscape character.	14. protect, conserve and enhance the historic environment.
Option 1	0	+	+	0	0	++	+	+	?	0	?	?	?	0

4.73 The SAR Table on p201-203 for this policy provides further explanation and clarification, with key themes being directing housing toward the most sustainable and accessible locations first (consolidation before spread), including accessibility to employment locations and services.

4.74 The SAR Table on p189 for draft Policy SGS 4 Strategic Housing Allocation, provides further clarity on the rationale for the approach:

The approach will result in the loss of greenfield land to support the projected growth in housing (and other land uses). Directing growth toward settlements with sequential

approach where building from the centre out will be encouraged (and phased through SGS 6) cumulatively helping to reduce the rate at which greenfield sites are converted. Phasing policy directs to brownfield and existing commitments first. Greenfield sites will not be required in all settlements and won't be identified until LPP stage. The LPP will take into account a range of factors including the physical characteristics of the land when identifying new zonings. (Emphasis Added).

- 4.75 The equivalent table on p197 for draft Policy SGS 5 Strategic Housing Allocation across Settlements contains similar sentiment:

The approach in itself doesn't directly result in greenfield land use, however the allocation does make it more likely that greenfield land will be developed. The majority of new housing will be within settlement limits of the higher tier settlements, and the redevelopment of brownfield sites will be encouraged, reducing pressure on the countryside areas, where there are quite conservative growth limits provided. This approach to limit dispersed/distributed housing and support more compact/dense housing results in more efficient land use and is able to reduce the overall scale of land take, acting positively for the objective, but in the context of the quantum of housing in the allocation there will also be land taken up and negative effects. There will be crossovers with SGS 6 in the phased release of land.

- 4.76 In summary, the rationale for the proposed phasing approach is:

- policy requires a managed approach;
- it is more sustainable to development brownfield land/land within urban footprints first and before greenfield land; and
- housing within urban footprints is more accessible to employment and services and so more sustainable.

- 4.77 The SPPS (para 6.142), under the title 'Measures to be contained in Local Development Plans' states that LDPs should provide for a managed release of housing land, in line a 'plan, monitor and manage'. Plan, monitor and manage is not defined in the glossary, nor in that of PPS12: Housing in Settlements. It is accepted that the SPPS advocates for a managed approach to the release of housing land but it equally it also advocates for a planned approach. Furthermore, use of the word 'should' falls short of a mandatory requirement, and confirms that there is discretion available, and an evaluative judgement to make, as is always the case when interpreting planning policy mindful of material considerations. Contrary to the SAR, the introduction of a phasing policy is not the only reasonable option available in the evidential context. Council had and continues to have the choice not to introduce such a mechanism if is appropriate not to.

- 4.78 In our judgement, having regard to the specific context and circumstances of this plan, it is not appropriate to introduce a phased approach to the release of any new housing land because:

- 4.79 Given that the 'best case' point of release of new land is five years away - 2030- (if not eight - 2033), after which time planning permission will need to be applied for and

granted, other consents secured and sites prepared and homes constructed (another four years on any significant site – 2034 or 2037), by which time, even at existing build rates (not the accelerated build rate necessary to catch up on the Council’s ‘success scenario’) existing commitments will likely be largely exhausted, it will not be necessary or appropriate to further delay the release of land;

- 4.80 Looking behind the SPPS to PPS12, which provides more detail on what is meant by ‘plan, monitor and manage’, whilst it suggests breaking or dividing the release of land into two phases (p52-55), it is clear that the approach of dividing supply into phases of 7 or 8 years was considered where plans are projecting forward approximately 15 years; that is not the case here, where we are already 8 years into the plan period, with 7 to go – effectively the existing commitments are phase 1 land and necessary ‘new’ land should not be phased, as with the passage of time the development of land has already effectively been phased, and sustainably so, with any new greenfield land by definition only being made available after the release of sequentially preferable land;
- 4.81 The vast majority of land in the larger zonings in the Principal Settlements of Bangor and Newtownards, as well as the Small Towns, where a phased approach is being proposed, is already committed, with planning permissions having been granted, or the subject of planning applications which are likely to be granted before the plan is adopted; a phased approach to the limited amount of existing zoned land which is not committed or new lands is not appropriate in this context as the ability to control the sequence in which it is built upon – from the centre out – has already been lost, albeit by the time new land is released it is likely that even more development will have occurred within urban footprints than currently, given the passage of time;
- 4.82 Phasing is not appropriate or necessary in the two Principal Settlements because:
- In Newtownards, even if theoretically possible, it would prevent the orderly and continuous construction of the relief road around the town;
 - In Bangor, as there has been no substantive change to the development limit of the City since the North Down and Ards Area Plan 1984-1995 (adopted 1989), a containment strategy has been in place for around 40 years already.
- 4.83 It would not be appropriate to introduce it to the Small Towns if it is not being introduced to the Principal Settlements.
- 4.84 The PS Growth Strategy’s employment-led approach to its housing strategy, which is to be commended, does not contemplate a phased release of zoned employment land, creating a risk that a phased release of housing land could frustrate the ability of the Council to achieve its ‘success scenario’, particularly in a context where it is already very far behind supporting the delivery of the number of homes required to generate the growth in working-age population necessary to facilitate job numbers, and will fall further behind every year unless delivery is accelerated; phasing housing land will not accelerate the delivery of housing;
- 4.85 Fettering the delivery of future housing in the Principal and Small Towns by deferring release upon adoption of the LPP to an unspecified later date could have the

unintended and unsustainable consequence of accelerating the delivery of a larger proportion of housing in the villages, small settlements and countryside, as developers seek to meet rising demand for new homes; this would work against the principle of consolidating growth in the larger settlements which accommodate the majority of the major employers and services, resulting in an increased need to travel by car;

4.86 Constraining the release of 'new' housing land beyond the adoption of the LPP in many years' time has the potential to prevent the Council achieving its social objective meeting the Borough's diverse housing needs up to 2032, not only through over-managing the delivery of market housing, but also by preventing the release of new zonings which would make a contribution to meeting the growing need for affordable homes under HOU3;

4.87 A phased approach to the release of housing land was considered in the Ards & Down Area Plan (ADAP), but recommended against 17 years ago by the Planning Appeals Commission (PAC) in circumstances not dissimilar to these:

2.13.8 It seems to us that even if the scope of the mid-term review were confined to deciding which Phase 2 lands are to be released for development, it would still take two to three years to complete. A significant amount of technical work would be involved, probably including equality impact assessment and strategic environmental assessment. In our opinion, the general public, including landowners and house builders, would be entitled to expect opportunities for consultation and participation. It is likely there would be objections and a fresh public inquiry. In any case, we consider the idea of following plan adoption immediately by a phasing review to be fundamentally flawed, because little or no new monitoring data would be available to support the review. In these circumstances, the decisions that would be taken in 2011/12 or 2012/13 are unlikely to be significantly different to those that could have been taken at the time of adoption.

4.88 The PAC was, in the case of the Antrim & Newtownabbey Borough Council Plan Strategy, 'convinced' by that Council not considering a phased approach to the release of housing land at plan strategy stage, because:

(i) most of the sites zoned in legacy Plans are either built out, under construction or approved for development and any attempt at phasing would be pointless, (ii) the vast majority of uncommitted sites are well within the urban fabric, (iii) uncommitted sites at the urban edges are the subject of current planning applications, pre-application discussions or application notices, and (iv) the Plan will take a sequential approach in respect of unzoned land, with brownfield sites first, urban sites next and then greenfield lands. These are convincing reasons to avoid any attempt at phasing and the Council's approach is sound. (PAC Report para 6.15).

4.89 The circumstances underlined are also in evidence in Ards & North Down. In terms of (iv), it is also the case here that when considering new zonings through its LPP, the Council could take a sequential approach where possible, without introducing a phasing approach. This would be consistent with its sustainability objectives.

4.90 As was confirmed by the PAC when finding the Lisburn & Castlereagh Plan Strategy sound, with no phasing mechanism, the phasing of housing land is not needed to

satisfy the requirements of Section 1 (1) of the Planning Act (Northern Ireland) 2011 or the soundness tests concerned with coherence and effectiveness (PAC Report para 5.55).

- 4.91 In our judgement, the arguments against including a phasing mechanism in the Plan Strategy are compelling, retaining it would undermine its own objectives and run counter to its growth strategy. Whilst we acknowledge that every plan is different, and some Councils have endorsed a phased approach, whilst others haven't, in the evidential context of Ards and North Down, given the trajectory of both the plan and the housing land supply, it is difficult to justify. Clearly, not phasing the release of land is a more reasonable option than phasing it, but there is also a third option – defer consideration of phasing until the LPP, rather than unnecessarily baking it into the Plan Strategy at this stage.
- 4.92 As noted above, it is likely to be several years (we estimate five) before the Council is in a position to bring forward a draft LPP. In five years' time the Council will be better placed to assess the rate and distribution of take up of existing commitments. During those five years development will continue to occur within existing urban footprints and on greenfield land with planning permission.
- 4.93 Belfast City Council's Plan Strategy Policy SP1A is as follows:

Policy SP1A – Managing growth and supporting infrastructure delivery

The allocation of land and development to deliver the Council's growth strategy should be supported by the appropriate infrastructure. In advance of the Local Policies Plan the first phase will comprise existing allocations or commitments. Additional development may be permitted in this first phase where it can be demonstrated that the necessary supporting infrastructure requirements can be met, having due regard to the views of the relevant statutory consultees.

The Local Policies Plan will review and update the existing first phase development commitments and assess projected requirements beyond this first phase. Any new zonings or development capacity identified will be managed and released in accordance with provisions to be set out within the Local Policies Plan. Development will therefore be phased in a manner that ensures the necessary supporting infrastructural needs are addressed.

- 4.94 The background to this policy is that at draft Plan Strategy stage the Council noted (para 5.1.4) that:

land will be zoned for housing, employment uses and mixed-use sites within the Local Policy Plan to deliver the council's growth aspirations. The delivery of employment space and homes will be phased to align with infrastructure capacity and investment over the plan period.

- 4.95 Elsewhere, in the Justification and Amplification of Policy HOU1: Accommodating new homes, at para 7.1.9, the draft Plan Strategy stated:

However, there is no automatic assumption that existing housing land will form part of the formal provision, particularly where detailed analysis identifies constraints affecting the availability and deliverability of sites. If necessary, land may be phased to ensure alignment of housing delivery with planned infrastructure investment and development lead-times.

- 4.96 Reflecting on the impact of the constraint of infrastructure availability, particularly sewerage infrastructure, the Commissioners recommended the introduction of a phasing policy in the final Plan Strategy:

3.42 Policy ITU2 – Water and sewerage infrastructure sets out that proposals for such development will be granted where their visual and environmental impact are kept to a minimum. Whilst encouraging the use of associated sustainable initiatives and technologies, Policy ITU2 does not grapple with the wider and more pressing issue of the role that the capacity of the city’s sewerage system has to play in delivering the growth strategy. Albeit that delivery of the necessary infrastructural upgrades is outside BCC’s remit, a strategic policy on phasing is needed within the dPS to flag up the matter – RA05. This would alert developers to the need for associated infrastructure to be available prior to sites being released for housing and employment space notwithstanding that they may be zoned for such in the LPP. This would not require that the infrastructure be in place for the dPS to be considered sound but would put in place a strategic framework for the alignment of the growth strategy with its provision. In order to ensure that potential developers are live to this critical issue, such a policy could comprise:

a. Committed housing lands and employment floorspace are treated as phase 1 zonings;

b. Phase 2 zonings would comprise new zonings in the LPP for housing and employment uses; and

c. Phase 2 zonings would only be released for development either after review of the dPS when it is established that sewerage capacity is no longer a potentially limiting issue and/or the necessary water and sewerage infrastructure is in place. The policy could consider situations where (temporary) on-site facilities might be acceptable. This may require the SA/SEA to be revisited.

- 4.97 As presently drafted the dPS fails soundness test CE1 because whilst it sets out a coherent strategy which recognises the important relationship between housing and employment (jobs), its approach to a phased release of housing land does not logically flow.

5. Part C – General Policies

- 5.1 Responses are provided to a number of the draft operational planning policies in turn below.

GP1 General Principles

- 5.2 Whilst we are broadly supportive of the general principles for development, whilst generally align with the SPPS, the policy is long and contains a significant level of duplication with specific planning policies elsewhere in the Plan Strategy. We would suggest a more concise format as more suitable for the benefit of both applicants and decision makers.
- 5.3 Specifically, we have concerns with the following parts of the policy as drafted.
- 5.4 At part (c) 5), the policy seeks to avoid unacceptable amenity impact by reason of *'general disturbance'*. This term is not used within regional planning documents and is ambiguous. Normal sources of impact on residential amenity are covered sufficiently by the other reasons listed within the criteria, without the requirement for reason 5). This aspect of the policy fails soundness test CE2 in that it is not appropriate or founded on a robust evidence base.
- 5.5 At part (d), reference is made to the provision of ease of access to *'reserved car parking, public transport facilities and taxi ranks'*. The requirement for ease of access to taxi ranks should, if anywhere, be dealt with by transport policies within the Plan Strategy, yet it is not referenced elsewhere in any other policy. The requirement for proximity to a taxi rank in any case is overly onerous and will not be practicable or appropriate for all developments. In this regard, the policy fails soundness test CE4.
- 5.6 At part (e) the draft policy states:
- "any emission of discharge of effluent (including sewage) arising from the development is in accordance with legislative requirements pertaining to air and water quality."*
- 5.7 Reiterating a requirement to comply with other non-planning legislation is deemed unnecessary for inclusion within the policy wording.

PA1 Planning Agreements

- 5.8 Draft Policy PA1 states that:
- "In appropriate case, the Council will seek contribution from developers where these are necessary for infrastructure delivery or to manage impact on the Borough's environment and services."*
- 5.9 This wording could be unintentionally interpreted as a mechanism for contributions being sought for the above where any impact has not directly arisen as a result of the development proposal. The Department's Development Management Practice Note 21 confirms that planning agreements should relate to the development being

proposed, such as where a proposed development would create a *direct need* (our emphasis) for particular facilities or place additional requirements on infrastructure. There should be a link between the development and any mitigation offered including any financial contribution. This is not made clear in the draft policy.

- 5.10 As worded, the policy fails soundness test C3 in that it does not take full account of the above guidance issued by the Department. We suggest the inclusion of wording to confirm that contributions may be sought to manage impact resulting directly from the development in question.

6. Part D – Strategic & Operational Topic Policies

HOU1 Housing Development in Settlements

- 6.1 Draft Policy HOU1 outlines the criteria which will determine when a Concept Master Plan is required. Criteria (b) – all, or part of, zoned housing sites of 15 hectares or more, and (c) - housing development on any other site of 15 hectares or more, are not clearly worded and could be combined into a single criteria requiring a Concept Master Plan on any sites of 15 hectares or more. The next paragraph within the policy is sufficient to secure the requirement for a Concept Master Plan for any partial development of a zoned site.
- 6.2 Whilst this is not considered to be a matter of soundness, we suggest the above simplification of the policy.

HOU2 Design of New Residential Development

- 6.3 HOU2 sets out in detail the design criteria for new residential development. There are several criteria which we have concerns with, in their current form.
- 6.4 Criterion (d) requires that:
- “adequate provision is made for necessary local neighbourhood facilities, where appropriate, to be provided by the applicant as an integral part of the development.”*
- 6.5 Firstly, the wording of the draft policy implies that the provision of neighbourhood facilities within residential development will be the normal expectation, insufficient clarity is provided in the amplification test as to any proportional application of the policy. Secondly, the policy requires such facilities to be an integral part of the development. Where this is often good planning, there may be circumstances where an off-site provision is preferable due to the specific needs of the community or due to development viability realities. This part of the policy is inflexible and fails the soundness test CE4.
- 6.6 Criterion (h) requires the design of development to *“draw upon the best local traditions of form, materials and detailing.”* Whilst in many circumstances, such an approach may be suitable and welcome, the inclusion of this criterion risks stifling innovative or contemporary design approaches which are sensitively designed to provide a high-quality development responding to its individual context. Whilst the SPPS (paragraph 4.29) does note that it is proper for policy and guidance to seek local distinctiveness, the same paragraph confirms that planning authorities should not attempt to impose a particular architectural taste or style arbitrarily.
- 6.7 The SPPS does not specify a requirement for traditional approaches to design. We suggest that this criterion should be removed and that design guidance specific to the Borough should direct design – carrying less weight than planning policy, and leaving space for non-traditional approaches. As drafted, the policy criterion (h) fails soundness test CE4.

- 6.8 Criterion (i) relates to the protection of amenity and includes the *term 'other disturbance'*. In similar vein to our comments at Paragraph 4.4 above, this is an ambiguous term which fails soundness test CE2.
- 6.9 Criterion (r) states that for the conversion and reuse of buildings, the development should not contain any flat or apartment which is *"wholly in the rear of the property and without access to the public street"*. Considerations of residential quality are sufficiently covered elsewhere in draft Policy HOU2 and criterion (r) as drafted is unduly onerous and restrictive. There may be bespoke design solutions or site layouts which enable the provision of a high-quality apartment to the rear of an existing property, and this should be a consideration for the decision maker on a case-by-case basis. As drafted, criterion (r) is not sufficiently flexible and fails soundness test CE4.

HOU3 Affordable Housing

- 6.10 The Council's draft affordable housing draft policy fails soundness tests C3, C4 and CE2 for the following reasons.
- 6.11 Firstly, the second paragraph states that where NIHE have identified an acute localised need, the proportion of affordable housing required *"may be uplifted on an individual site"*. Whilst we support the general principle of the draft policy and the provision of affordable housing, the inclusion of this caveat within the policy creates uncertainty for landowners and developers when assessing land value and the viability of a proposed development. Certainty is required as to the maximum affordable housing proportion required on any particular site. This part of the draft policy should be removed.
- 6.12 It is notable that the policy as drafted does not follow the approach and established blueprint of affordable housing policy of the neighbouring local authority at Belfast City Council. That policy has been in successful operation for over two years and does not include such a caveat, ensuring that a degree of certainty is assured.
- 6.13 Secondly, paragraph four within the draft policy states *that "affordable housing shall consist of social rented housing and/or intermediate housing"*. This is an unreasonably inflexible definition which need not be included in the policy wording. Reference should be made to the definition of 'affordable housing' as set by the Department for Communities, noting that this definition has changed previously and may change again during the lifetime of the LDP.

HOU4 Accessible and Adaptable Homes

- 6.14 Whilst we are supportive of the gist of draft policy HOU4, criterion (c) includes highly specific requirements for the layout and design of staircases within dwellings. As drafted the policy is not suitably flexible to account for other potential accessible design solutions and fails soundness test CE4. We suggest a simplification of the wording of the criterion to require the design of stairs to take account of the potential future need for a stair lift installation.

7. Part E – Monitoring & Review

- 7.1 We note the emphasis in paragraphs 26.1 and 26.2 on the importance of monitoring and review to ensure LDPs are up to date and achieving their objectives. Paragraph 26.2 underlines that a Council may revise its LDP at any time, if a review identifies that changes are required. Paragraphs 26.3 to 26.8 describe the content of an Annual Monitoring Report (AMR) and subsequent pages contain details of the anticipated Monitoring Framework. Paragraph 26.9 explains the role of the five year review and paragraph 26.10 outlines several courses of action that might be taken should evidence suggest that a policy is not achieving the desired outcome.
- 7.2 It is agreed that monitoring and review is important to ensure LDPs are achieving their objectives but it is no substitute for ensuring that the LDP is fit for purpose at the point of adoption. As set out in this representation, we are concerned that the LPP will be adopted in and around the currently stated end date of the plan. Our clear recommendation is that a longer plan period is required to underpin the soundness of the plan.
- 7.3 A longer plan period, to at least 2035 would also make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the 'inherited' strategies, limits and zonings of the legacy plans - this would also be consistent with the Development Plan Practice Note 01 reference to a 15 year plan framework. Otherwise the risk is that when the LPP part of the plan is finally adopted, comparison with the previous plans could raise questions around what has actually changed. Given the relatively limited change from NDAAP to BMAP (for Bangor and Holywood), the concern would be that plans adopted nearly 40 years apart would not be that different. With the repatriation of planning to local government, this would not be a welcome part of the debate for the new Council's first plan.
- 7.4 Selection of a longer plan period would also reduce the risk of having to identify additional reserves of land to bridge a gap which might emerge in future. This has been the experience in other plan-making exercises such as the Lisburn Area Plan 2001 and BMAP.
- 7.5 Given the considerable investment by the Council (and others) in the plan-making process, the potential to review the plan immediately after it has been adopted in order to maintain continuity of land supply and achieve the Council's success scenario in relation to growth must not be used as a reason to avoid addressing the issues with the plan which are already apparent and eminently resolvable prior to adoption.

8. Accommodating Growth in Bangor

- 8.1 Whilst the focus of this submission has been strategic and makes the case for ensuring continuity of a supply of homes in Bangor commensurate with its scale, and we recognise that consideration of the locations of any future zonings is for the LPP, it is important to make good the point that the City is physically capable of accommodating sustainable urban extensions, without harm to its setting or character.
- 8.2 As illustrated at Appendix 4, the physical constraints to the growth of Bangor have been long established through successive planning processes. The coalescence considerations to the west (Crawfordsburn), south (Newtownards) and east (Groomsport), and the presence of the Clandeboye Estate, mean that the potential for greenfield expansion is along the south/south eastern edge, including a strategic rounding off at Green Road. Site specific considerations will obviously follow at a later stage of the Plan making process but on the basis that the case for the continued growth of the City is accepted, we welcome the confirmation of our analysis in the dPS technical supplements.
- 8.3 As we appreciate the importance of place making and the LDP's statutory link to community planning, we have been approaching our clients' land interests with a view to helping the Council achieve its vision by going beyond a 'standard' approach to housing. This has manifested itself in an approach to masterplanning characterised by the inclusion of a full range of house types and tenures, ensuring connectivity to the existing urban area, the delivery of well-located and meaningful areas of open space and careful consideration of the urban/rural edge.
- 8.4 Our concept masterplan for the Gibson's Lane/Green Road area, by Alan Patterson Design, is provided at Appendix 7 of the POP Representation at Appendix 1.

Appendix 1: POP Representation

**Response to Ards & North Down Preferred
Options Paper**
The Gibson Family in respect of Green Road,
Bangor

August 2019

Contents

Executive Summary	i
1. Introduction & Background	3
2. Vision, Ambition & Plan Period	4
3. The Case for Growth in Bangor	6
4. Developer Contributions, Affordable Housing & Lifetime Homes	12
5. Summary & Conclusion	15
<hr/>	
Appendix 1: Questionnaire	
<hr/>	
Appendix 2: Settlement Analysis of Bangor & Newtownards	
<hr/>	
Appendix 3: Review of Evidence Underpinning the Housing Strategy	
<hr/>	
Appendix 4: Analysis of Housing Land Supply	
<hr/>	
Appendix 5: Analysis of NISRA Information	
<hr/>	
Appendix 6: Analysis of Sustainability Appraisal	
<hr/>	
Appendix 7: Alan Patterson Masterplan	
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Client

Gibson Family

Our reference

GIBB3001

9 August 2019

Executive Summary

1. This response has been prepared on behalf of the Gibson Family, who are long standing land owners in Bangor that have facilitated and wish to continue to facilitate the growth and development of the Borough.
2. The principal concern of the family is that, as drafted, the POP would suggest that the growth of Bangor is likely to be restricted by a housing strategy which is over reliant on long standing unreliable sites and an aggregate of smaller housing sites. The sites that are currently making a housing contribution will be exhausted long before the end of the Plan period.
3. Such an approach would be inconsistent with the scale and critical mass of Bangor, part of the Belfast Metropolitan Urban Area (BMUA), the largest town in the Borough and one of the largest towns in Northern Ireland, as well as the requirement to achieve sustainable development in the Borough, having regard to the RDS settlement evaluation framework. It would overlook Bangor in much the same way BMAP did, leaving it with little more than the old North Down & Ards Area Plan.
4. It is both disappointing and contrary to guidance that the POP has selected a preferred option of assessing the deliverability of housing land rather than undertaking this assessment and then identifying options for public consideration. Deferring this to draft Plan Strategy stage prevents stakeholders, such as the companies, engaging in the debate in a meaningful and informed way before the Strategy is fixed.
5. The consequences of the approach for the Borough could be:
 - Continuity of legacy unsustainable patterns of development for the foreseeable future;
 - Limited impact on the Borough's housing affordability pressures – despite its recognition as a key issue;
 - Disconnection with the Council's objective to create 7,500 new jobs by 2030 insofar as this scale of investment by business requires access to a labour force.
6. When bringing forward its draft Plan Strategy, it is recommended that the Council:
 - Consider the potential for a longer plan period – to 2035. Given the length of time it has taken to get to this point in the plan-making process and the significant investment in Council resources involved. This would also provide more scope for the Council to achieve a distinctive new plan for the Borough, rather than carrying forward the inherited strategies, limits and zonings of the legacy plans.
 - Reconsider whether the HGI accurately reflects the factors that are likely to generate a need for housing in the Borough, including the need to address housing affordability pressures and support the local economy by providing the labour force required for business growth.

- Review the settlement strategy, sustainability assessment and housing distribution taking account of the significance of Bangor and the directions set in the Regional Development Strategy (RDS).

7. Addressing these recommendations would enhance the potential for the plan to be found to be sound having regard to:

- The RDS 2035;
- The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004;
- Development Plan Practice Note 4; Sustainability Appraisal incorporating Strategic Environmental Assessment. April 2015.

1. Introduction & Background

- 1.1 This response to the Ards & North Down Borough Council Preferred Options Paper (POP) has been prepared on behalf of the Gibson Family.
- 1.2 The Gibson Family own land in the Green Road area of Conlig/Bangor. They have sold zoned land to a local housebuilder in the past and currently own residual land that was considered positively by the Department during the BMAP process and recommended for inclusion in a Short Term Land Release by the Planning Appeals Commission (PAC).
- 1.3 The Gibson Family welcomes this opportunity to respond to the Council's invitation to join the debate on the key issues of strategic significance which are likely to influence the direction of future development within the Borough.
- 1.4 This response should be read alongside the questionnaire response at Appendix 1 which has also been submitted separately consistent with the Council advice.
- 1.5 The response is structured as follows:
 - Section 2 comments upon the Council's Vision and ambition and, particularly, the plan period;
 - Section 3 considers the case for a larger housing allocation for Bangor;
 - Section 4 provides a response on other aspects of the POP, including developer contributions, affordable housing and lifetime homes.
 - Section 5 provides sets out a summary and conclusion of the representation.

2. Vision, Ambition & Plan Period

- 2.1 The companies welcome the Council's Vision that *"Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live."*
- 2.2 To the extent that vibrant perhaps does not communicate a clear desire for growth, we would suggest that the Vision could be amended to include this word.
- 2.3 The Vision is also focused on the Borough being a place to live. Whilst we would support this given the importance of ensuring that housing need is met in the right places in the right way, there is a case for broadening out the Vision to include being a place to live, work, visit and invest, particularly given the plan objective of enabling sustainable economic growth.
- 2.4 The main point to be made in respect of how the plan is set up is, however, in relation to the plan period.
- 2.5 The plan horizon is to 2030 – presumably calculated as 15 years from 2015 when Council assumed plan making responsibility. On the basis of the Council's latest¹ published timetable, the Local Policies Plan (LPP) part of the plan is not anticipated to be adopted until 2023/2024. The indicative dates in the timetable suggested that the POP would be published in Q2-3 2018/2019 – by December 2018. The POP was published in April 2019, four years after taking responsibility for plan-making and as a result of the re-starting of the consultation period is now some six months behind.
- 2.6 The Timetable identifies certain risks to the indicative programme. Taking into account the risks identified and the delay identified above it would be optimistic to suggest that the LPP part of the Plan would be adopted during 2024. Arguably 2025 or 2026 would be more likely. This would leave only four or five years of a plan period to 2030. The decision for the Council then would be whether to undertake the five year review of the plan or start a new plan making process at this point.
- 2.7 Whilst it is obviously understood that plans are material beyond their stated end date, given the time and resources being invested in the process by the Council, consultees and stakeholders, getting the most out of the plan making process is critical, particularly given the 'legacy' of BMAP which leaves the North Down and Ards Area Plan 1984-1995 (NDAAP, adopted 1989) as the statutory plan for the former North Down part of the Borough.
- 2.8 The length of time it takes to prepare applications and secure planning permission on freshly zoned land is also an important consideration – a newly zoned site for housing or employment in 2026 would not be likely to be able to be commenced until 2028.
- 2.9 Ards and North Down is the last Council to issue its POP yet it has selected a plan horizon which is amongst the shortest of the 11 Councils. Belfast City Council has taken a slightly longer term view and established a plan period to 2035. It published

¹ <https://www.ardsandnorthdown.gov.uk/downloads/LDP-Timetable-Agreed-Dfl-Nov-2017.pdf>

it's POP in January 2017. Derry City & Strabane District Council has set out a plan period to 2032. It published it's POP in May 2017.

- 2.10 A longer plan period, to 2035 would also make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the 'inherited' strategies, limits and zonings of the legacy plans. This would also bring it into line with the relevant guidance from the Department. Otherwise the risk is that when the LPP part of the plan is finally adopted, comparison with the previous plans could raise questions around what has actually changed. Given the relatively limited change from NDAAP to BMAP (for Bangor and Holywood), the concern would be that plans adopted nearly 40 years apart would not be that different. With the repatriation of planning to local government, this would not be a welcome part of the debate for the new Council's first plan.
- 2.11 Selection of a longer plan period would also reduce the risk of having to identify additional reserves of land to bridge a gap which might emerge in future. This has been the experience in other plan-making exercises such as the Lisburn Area Plan 2001 and BMAP.

3. The Case for Growth in Bangor

Introduction

- 3.1 The main, but not only, focus of attention for the Gibson family is Bangor. The Family was previously represented during the Public Local Inquiry into objections to draft BMAP.
- 3.2 The consistent overarching analysis of the companies is that Bangor, given its scale, infrastructure and critical mass, should be allocated a larger share of housing allocation to meet its needs and that fresh housing zonings are required because the existing supply is both unreliable and, in part, an aggregate of smaller granular sites.

Settlement Strategy

- 3.3 The Council proposes to revisit its Settlement Strategy. This is not an unexpected or unusual step given the passage of time since the settlement strategies were prepared in the legacy plans. The principle of revisiting it is supported, however, as currently drafted it does not reflect the role of Bangor and Holywood as part of the Belfast Metropolitan Urban Area (BMUA). Indeed in this context it is important to note that Paragraph 4.18 of Technical Supplement 2 of the Belfast draft Plan Strategy points to the possibility of Councils such as Ards and North Down taking some growth from Belfast in the event that it can't accommodate its own growth.
- 3.4 Whilst it is accepted that Newtownards also has a BMA function - the RDS (para 3.86) identifies it as a key commuter town to Belfast due to its proximity and accessibility to the city, giving it the potential to cluster with the BMUA – in contrast to Bangor, it is outside the actual BMUA, the major conurbation in NI, where Bangor plays an important complimentary role (RDS para 3.41). This distinction could be better reflected in the Settlement Strategy.
- 3.5 In a similar context, the Antrim and Newtownabbey Borough Council draft Plan Strategy identifies Metropolitan Newtownabbey as Tier 1 in the Settlement Hierarchy, with Antrim, a 'major hub town' as Tier 2. That draft Plan Strategy includes a Spatial Growth Strategy which identifies both as a 'focus for core growth'.
- 3.6 Whilst there are references to the RDS evaluation framework in the POP and some of the Technical Supplements, it would have been reasonable to expect the POP to have provided a full assessment of each of the settlements against the resource, environmental capacity, transport, economic development, character and community services tests within the RDS evaluation framework.
- 3.7 We have undertaken this exercise for Bangor and Newtownards (Appendix 2). This evidence base would presumably have supported the Sustainability Assessment in enabling a better view to have been taken about the relative strengths, weaknesses, opportunities and threats facing each of the settlements. This work is important, alongside the HGIs, in interpreting the direction of the RDS and establishing the growth strategy.

Housing Need

- 3.8 At a strategic level, the starting point for the housing strategy in the POP is the Housing Growth Indicators (HGIs). Our analysis of the approach to housing need, including the HGIs is set out in the paper at Appendix 3.
- 3.9 While the Council has ostensibly sought to meet housing needs in full, it has limited its assessment of the scale of this need – and as such, the proposed housing requirement – to the Housing Growth Indicator (HGI) published by the Department for Infrastructure in 2016.
- 3.10 Whilst it is agreed that the HGI is an important reference point in establishing a locally evidenced requirement, they are produced only *‘as a guide for the preparation of the LDP’* as correctly acknowledged by the Council within the POP.
- 3.11 The POP claims that the *‘proposed strategy will deliver the housing that is needed within the borough’*, yet it is unclear how this conclusion has been reached in the absence of evidence on the actual housing needs of Ards and North Down, beyond the citing of the HGI. This is not covered in any of the 17 Position Papers published by the Council alongside the POP, despite individual papers focusing on “Population and Housing” and the “Housing Allocation”.
- 3.12 As such, there appears to have been no consideration or interrogation of whether the HGI accurately reflects the factors that are likely to generate a need for housing in Ards and North Down. For example, there has been no consideration as to whether such a level of provision would be sufficient to address housing affordability pressures, despite their recognition as a key issue in the borough. It is also unclear whether the HGI would support the local economy and provide the labour force required for businesses to grow and thrive, or instead act as a constraint to this growth. This is important given the direction in the RDS in respect of addressing commuting from Bangor to Belfast.

Housing to Support Economic Growth

- 3.13 The proposed level of housing provision does not appear to have been considered in the context of baseline forecasts which suggest that 4,500 jobs are likely to be created in the borough over the plan period, nor the Council’s objective to create 7,500 jobs by 2030. This is despite the ambition being central to the Council’s Integrated Strategy for Regeneration, Economic Development and Tourism. As such, although the Council states that *‘the LDP, through supporting policies, will seek to facilitate such jobs growth’*, it has not explored the potentially critical role of housing provision in supporting the realisation of this ambition.
- 3.14 Simply providing the homes needed to accommodate growth implied by the 2012-based population projections, through the HGI, would not be expected to grow the working age population of Ards and North Down. This would potentially threaten the realisation of the Council’s economic job growth target, conflicting with the Council’s stated intention to *‘facilitate such jobs growth’* through *‘supportive policies’*.
- 3.15 The important relationship between housing need and employment growth is not sufficiently explored within the POP or its underlying evidence base. The Council should

look to consider in more detail how its labour force could change if housing provision were constrained to the level implied by the HGI, and separately seek to establish the level of population growth that would likely ensure the provision of an adequate labour force over the plan period to support its ambition to create 7,500 jobs. Implications for the establishment of an appropriate housing requirement would then need to be considered by the Council in the context of other drivers of need.

Increasing Supply to Address Affordability Issues

- 3.16 As set out above, a need and demand for housing will be generated in Ards and North Down both by projected household formation and future economic growth. This demand must be balanced against supply to avert an imbalance, which would be likely to manifest itself in rising house prices and rents. This would in turn worsen housing affordability, and have a particularly marked impact on the ability of younger people to enter and exercise reasonable choice within the housing market. The existence of this issue in Ards and North Down is acknowledged within the POP .
- 3.17 The Council has identified that the borough is already characterised by high house prices, with average prices the second highest in Northern Ireland behind only Lisburn and Castlereagh . This is a strong indicator that the supply of housing in the borough has historically fallen short of demand.
- 3.18 The HGI of 546 dwellings per annum would represent a continuation of the historic rate of provision, with the POP indicating that delivery has averaged 530 – 550 homes per annum during recent periods. Delivering at such a rate does not appear to have allowed the housing market to achieve a more sustainable balance between supply and demand, based on the evidenced worsening of the affordability situation in Ards and North Down. As such, there is no evidence to suggest that a continuation at this rate would address one of the key challenges identified in the POP.

Housing Land Supply

- 3.19 It is unsound to have concluded that the preferred option is to assess the effectiveness of the housing land supply in order to determine whether additional land is required. The housing land supply should have been assessed before now so if, as we would suggest, additional housing land is required, options for the delivery of the additional housing could have been consulted on. The approach the Council has taken falls short of that required by Development Management Practice Note 5 insofar as the survey and information gathering stage of the plan-making process clearly precedes the generation of options. This failure has also affected the ability of the Sustainability Assessment to properly assess the merits of alternative options for accommodating growth.
- 3.20 We have undertaken our own assessment of the information provided by the Council. The comparison of housing land availability information for Bangor which is summarised at Appendix 4 shows that there is land for over 3,000 units remaining. Considering the number of houses built in the five year period from 2013 to 2018, this would suggest the availability of an adequate and continuous supply of land which could serve the town well into the new Plan period.

- 3.21 When reviewed on a site by site basis, however, the data shows that a very significant number of the monitored sites (around two thirds) did not deliver any houses in the period between the two housing monitors. Whilst it is accepted that some of these sites may now be delivering housing, to ensure the delivery of a sound plan, it is incumbent on the Council to interrogate the housing land supply data in order to satisfy itself that there is a deliverable supply. This may mean that long standing sites which have not delivered houses are discounted from the housing land supply because they cannot be relied upon. With evidence suggesting housing completions have increased in recent years, the supply of deliverable housing land in the larger sites will be exhausted well before the stated end date of the Plan.
- 3.22 The data also clearly shows that a large number of the housing monitor sites are small scale, with an equivalently low yield. Whilst we appreciate the importance of windfall and urban capacity sites in the context of an overall housing land supply, the LDP's housing strategy should not over rely on this source of potential supply to the exclusion of larger sites owned by housebuilders or willing landowners which can make a significant and consistent contribution to the town's housing requirements over the plan period.
- 3.23 The POP should have proposed and assessed options on the basis of this evidential context, not proposed an option involving the assessment of information which is already available. To essentially defer this to draft Plan Strategy stage essentially prevents stakeholders contributing to a meaningful and informed debate about options to address one of the key planning issues facing the Borough.

Bangor - A Main Town for Further Growth

- 3.24 Bangor should have a higher housing allocation. The suggestion of 'further modest growth', 'if necessary' is unsound and a step backwards from the PAC's analysis during BMAP that the town was capable of accommodating medium level growth taking account of the direction in the RDS 2025 (p65-79 and the Family of Settlements Report, FOSR) and its role within the Belfast Metropolitan Area.
- 3.25 At paragraph 3.2.45 of their report, the PAC said of the RDS 2025 that:
- The broad aims of enhancing the role of the city of Belfast, developing the complementary roles of Newtownabbey and Castlereagh and developing the towns of Bangor, Carrickfergus and Lisburn reflect a strategy that aims to provide a reasonable balance across the area whilst identifying some areas as a focus for growth and identifying general factors that will inhibit further expansion.*
- 3.26 The PAC went on to say that:
- In view of the generality of factors identified, we do not favour the numeric score approach but consider that an assessment of RDS directions of growth on the basis of 'high', 'medium' and 'low' as is done in the MRA is to be preferred. These categories should be used to guide both the direction and levels of growth to be accommodated to deliver the balance sought across the component Districts.*
- 3.27 They favoured the use of the FOSR:

We can find no evidence of the Department having given any consideration to the FOSR and, having considered the scores allocated by the Department, we think that some adjustments are needed to more accurately reflect RDS directions.

- 3.28 At 3.2.54 the Commission set out the following consideration of the role of Bangor in the context of North Down and the BMA:

Bangor is identified as an important commuter settlement but its role as a dormitory town is to be reduced and its residential role consolidated. The FOSR identifies a need for more compact urban form and greater emphasis on development within the town is envisaged..... In view of the above factors and the need to prevent coalescence with other settlements we conclude that its score on RDS directions only just falls within the category of 'medium'.....We see no reason for a separate score for Metropolitan North Down and Holywood but accept that there is little growth potential in this part of the Borough due to the landscape wedge and setting of the Holywood Hills and as a result most of the growth will be focussed on Bangor.

- 3.29 The later version of the RDS (2035), published in 2012, does not diminish its analysis of the characteristics of Bangor in the context of the BMUA. It recognises the scale of Bangor insofar as it confirms its population as 60,000 on page 55 (twice as large as Carrickfergus, which it is categorised with).

- 3.30 Indeed Bangor is one of the largest towns in Northern Ireland. An analysis based on NISRA information is provided at Appendix 5. The Northern Ireland Statistics & Research Agency (NISRA) Review of the Statistical Classification and Delineation of Settlements Report (March 2015) identified Bangor as the third largest Band C (Large Town) settlement in Northern Ireland by population. Taking account of Belfast (Band A) and Londonderry (Band B), this means that Bangor is the fifth largest settlement in Northern Ireland. With a 2011 Census population of 61,401 Bangor is more than twice as large as Ards & North Down's other Band C settlement - Newtownards (population 28,039).

- 3.31 The key inter-related strands of the RDS 2035 for Bangor are:

- (i) Its role within the BMUA insofar as it functions as a dormitory town with significant commuting to Belfast.
- (ii) The opportunity for waterfront regeneration within the town centre.
- (iii) The need to extend its employment and retail base to serve its large residential catchment.

- 3.32 The town clearly has a scale, critical mass and infrastructure at the upper end of Northern Ireland's settlement hierarchy. It is an important settlement in its own right as well as having a functional relationship with Belfast and the wider BMUA. Its housing strategy and final housing allocation needs to be:

- (i) Proportionate to its scale within the Borough;

- (ii) Geared to support the growth of its employment base to try as far as possible to reduce commuting to Belfast;
 - (iii) Sufficient to support the regeneration of its waterfront and town centre.
- 3.33 Increasing the housing allocation to Bangor would be consistent with the direction of travel flagged in the Sustainability Appraisal Interim Report which attached importance to consideration of the current distribution of population, services and facilities and providing provide good quality, sustainable housing in the medium to long term (further analysis of the Sustainability Appraisal is at Appendix 6).
- 3.34 In the absence of a step change in the delivery of new housing in Bangor, continuity of the trend towards an ageing population will tend towards 'managed decline' rather than 'modest growth', both of which would fall well short of the medium level of growth that it has been recognised as requiring.

Accommodating Growth in Bangor

- 3.35 The physical constraints to the growth of Bangor have been long established through successive planning processes. The coalescence considerations to the west (Crawfordsburn), south (Newtownards) and east (Groomsport), and the presence of the Clandeboye Estate, mean that the potential for greenfield expansion is along the south/south eastern edge, including an obvious rounding off of the urban edge at Green Road which was considered positively by the Department during the BMAP process and recommended for inclusion in a Short Term Land Release by the Planning Appeals Commission (PAC).
- 3.36 As we appreciate the importance of place making and the LDP's statutory link to community planning, we have been approaching our clients' land interests with a view to helping the Council achieve its vision by going beyond a 'standard' approach to housing. This has manifested itself in an approach to masterplanning characterised by the inclusion of a full range of house types and tenures, ensuring connectivity to the existing urban area, the delivery of well-located and meaningful areas of open space and careful consideration of the urban/rural edge.
- 3.37 Our concept masterplan for the Gibson's Lane/Green Road area, by Alan Patterson Design, is provided at Appendix 7. Aspects of the masterplan are elaborated on in the context of some of the other parts of the POP in the next Chapter.

4. Developer Contributions, Affordable Housing & Lifetime Homes

Developer Contributions

Q10. Do you agree with the aim of Developer Contributions?

4.1 Developer contributions should only be sought in the circumstances set out in the SPPS and must satisfy the legal tests. The Plan must take care not to introduce a policy that would affect decisions by developers to invest. Development is a voluntary activity. A policy which would discourage development will undermine the ability of the plan to achieve its own objectives since, for a large part, these depend upon delivery by the private sector.

4.2 The POP suggests that:

Housing developments would mainly benefit from a developer contributions policy. Key site requirements for a housing zoning could specify the need for a financial contribution by the Developer towards the development or upgrade of nearby play park provision by the Council or other open space.

4.3 It would be inappropriate to establish such a key site requirement as the need, or otherwise, for such a requirement would depend upon whether such a development or upgrade was directly related to the new housing sought. This judgement would be informed by whether the proposed housing was of an appropriate scale and whether it was making its own provision integral to the new housing itself.

Q11. Do you agree with the Approach outlined in the Preferred Options Paper?

4.4 No. Identifying sites where developer contributions would be required would not be sound because it would prejudge an assessment that would be best made during the development management process.

4.5 The statement that 'In order to facilitate development through contributions, so that it does not deter investment, consideration will also be given to the exact level of developer contributions.' confirms the importance of ensuring development remains viable. To set developer contribution requirements through the plan making stage would necessarily require engagement in a level of detail which is not yet available. Many other factors are at play in viability, such as the abnormal costs, infrastructure requirements and the costs and values of a development. These would be unknown at zoning stage and could also change during the lifetime of the plan.

4.6 Unfortunately whilst, as the Council's assessment of Option 1b recognises, there will be resource implications for the Council in assessing the need for developer contributions on a case by case basis, it is a better option that the preferred option and is not an unusual requirement for local planning authorities.

Facilitating Affordable Housing

4.7 Preferred Option:

Option 7d: The LDP will provide affordable housing through the use of the proportional approach, Key Site Requirements or zoning of entire sites, dependent on a number of factors, including identified need

Q24. Do you agree with the preferred option?

- 4.8 The POP recognises that the need for affordable housing is ‘a major issue’ in Ards and North Down , with the Northern Ireland Housing Executive (NIHE) recording 3,060 households within the borough that are in need of social housing. Around two thirds, or over 2,000 households, are in housing stress . NIHE estimates that 706 social units are needed in Ards and North Down over the next five years, equivalent to circa 140 per annum.
- 4.9 The POP proposes a strategy that would aim to meet this need through a combination of different approaches, including by securing a proportion of affordable housing in new developments. It suggests, for example, that a 20% proportion could be required for developments of over 50 units. Where this proportion was achieved, it would indicatively suggest that the delivery of over 700 homes each year could be required to meet an annual need for 140 social units.
- 4.10 This strategy can be supported in principle, however, because of the level of committed housing sites, the only way this strategy will succeed in achieving its objective is through the allocation of new housing land. Without fresh zonings there is a potential risk that the POP would fail to address an issue that the Council has identified as significant to ensure the sustainable future of its residents and communities.

Facilitating the delivery of Lifetime Homes

- 4.11 Preferred Option:

Option 8a: The LDP shall provide a proportion of Lifetime Homes in new developments

Q27. Do you think the LDP should direct a proportion of Lifetime Homes to be included in new development?

- 4.12 The POP sets out that:

“Lifetime Homes are designed to create better living environments for everyone, from raising children, coping with illness or dealing with reduced mobility later in life. They seek to provide homes that are accessible and adaptable, therefore allowing people to remain independent for longer in their own homes. The development of housing to the Lifetime Homes standard is especially important in the context of an ageing population and can help prevent costly and disruptive adaptations.”

- 4.13 The Council is proposing that proportion of all new homes will be required to be built to Lifetime Homes standards. Whilst the SPPS encourages that Councils identify local design policies and guidance within the LDP, it does clearly state that:

“Local design policies and guidance should not lead to a rigid and formulaic approach to decision-taking but encourage good design and responsible innovation, originality or initiative.”

- 4.14 The Council references the importance of Lifetime Homes in the context of an ageing population, however no housing need figure for such provision has been provided. A better, more sustainable approach to address specific housing needs would be to identify housing requirements for special housing and provide planning policies to support their development.
- 4.15 Furthermore the provision of housing that is bespoke to specialist needs would free up other forms of housing for families etc. For example whilst a family house could be adapted to accommodate an elderly person, would they wish to live in a large house or should consideration be given to the provision of bespoke accommodation which would enable family housing to be freed up.
- 4.16 Rather than introduce an arbitrary requirement, the council should undertake a detailed analysis of the housing stock and the future housing need to ensure that housing developments in the future provide for a suitable range of housing styles and size. This approach would be better aligned with the measures that should be contained within the LDP, as outlined at paragraph 6.142 of the SPPS.

5. Summary & Conclusion

- 5.1 This response has been prepared on behalf of the Gibson Family who are long standing land owners in Bangor that have facilitated and wish to continue to facilitate the growth and development of the Borough.
- 5.2 The principal concern of the family is that, as drafted, the POP would suggest that the growth of Bangor is likely to be restricted by a housing strategy which is over reliant on long standing unreliable sites and an aggregate of smaller housing sites. The sites that are currently making a housing contribution could be exhausted long before the end of the Plan period.
- 5.3 Such an approach would be inconsistent with the scale and critical mass of Bangor, part of the Belfast Metropolitan Urban Area (BMUA), the largest town in the Borough and one of the largest towns in Northern Ireland, as well as the requirement to achieve sustainable development in the Borough, having regard to the RDS settlement evaluation framework.
- 5.4 It is both disappointing and contrary to guidance that the POP has selected a preferred option of assessing the deliverability of housing land rather than undertaking this assessment and then identifying options for public consideration. Deferring this to draft Plan Strategy stage prevents stakeholders, such as the companies, engaging in the debate in a meaningful and informed way before the Strategy is fixed.
- 5.5 The consequences of the approach for the Borough could be:
- Continuity of legacy unsustainable patterns of development for the foreseeable future;
 - Limited impact on the Borough's housing affordability pressures – despite its recognition as a key issue;
 - Disconnection with the Council's objective to create 7,500 new jobs by 2030 insofar as this scale of investment by business requires access to a labour force.
- 5.6 When bringing forward its draft Plan Strategy, it is recommended that the Council:
- Consider the potential for a longer plan period – to 2035. Given the length of time it has taken to get to this point in the plan-making process and the significant investment in Council resources involved. This would also provide more scope for the Council to achieve a distinctive new plan for the Borough, rather than carrying forward the inherited strategies, limits and zonings of the legacy plans.
 - Reconsider whether the HGI accurately reflects the factors that are likely to generate a need for housing in the Borough, including the need to address housing affordability pressures and support the local economy by providing the labour force required for business growth.

- Review the settlement strategy, sustainability assessment and housing distribution taking account of the significance of Bangor and the directions set in the Regional Development Strategy (RDS).

5.7 Addressing these recommendations would enhance the potential for the plan to be found to be sound having regard to:

- The RDS 2035;
- The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004;
- Development Plan Practice Note 4; Sustainability Appraisal incorporating Strategic Environmental Assessment. April 2015.

Appendix 1: Questionnaire

Response ID ANON-UGMZ-GXCC-8

Submitted to **Ards and North Down Borough Council POP Response Questionnaire**

Submitted on **2019-08-09 13:11:50**

Respondent Information

1 Name

Name:

Turley (OBO The Gibson Family - Green Road, Bangor)

2 Address

Please provide preferred contact details, organisation or client address:

Hamilton House

3 Joy Street

Belfast BT2 8LE

3 Telephone Number

Telephone Number:

028 9072 3900

4 Email

Email:

michael.gordon@turley.co.uk

5 Are you responding as an individual, as an organisation or as an agent on behalf of an individual, group or organisation?

Agent

Ards and North Down Profile, Vision, Aims and Objectives

6 Do you have any comments on the District Profile and Policy Strategy that should be taken into account when preparing the Plan Strategy?

District Profile:

Reference is made to adjoining Council areas. The extent to which there has been engagement with these Councils during the preparation of the POP is unclear. The main towns of Bangor and Newtownards are within the Belfast Travel to Work Area and the Belfast Housing Market Area. The figures on the proportion of the Borough's population that live in the northern part of the Borough is interesting but how have the cross boundary issues and relationships between ANDBC and the other Councils been taken into account in the development of the Plan Strategy, particularly in respect of housing and particularly insofar as Belfast has set out an ambitious agenda for growth?

The demographic profile points up a key issue in respect of meeting the housing needs of an increasingly older population, which the plan needs to address. The question asks for comment on Policy Strategy but there is no information on Policy Strategy, only the Policy Context, which identifies the planning and other policy context for the preparation of the LDP. Reference is made to the regional direction set out in the Regional Development Strategy but there is no explanation of the Council's interpretation of this direction.

7 Do you agree with the Proposed Vision?"Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live."

Vision:

The vision is positive but could be made even more positive by a reference to growth. It is also focused on living in the Borough. It could be broadened to include references to working (employment) and visiting (tourism).

8 Do the aims and objectives strike the right balance between social, economic and environmental considerations?

Don't Know

Objectives:

It is difficult to comment on whether the balance between the stated objectives is right without more information on the details of the plan.

There are issues with some of the People/Social objectives:

- Bullet 1: Settlement hierarchy: A distinction could usefully be made between large and small towns (as at Table 2, for example) given the wide variation in population size between the largest (Bangor) and smallest (Portaferry/Ballygowan) towns.
- Bullet 2: Meeting housing need: 2030 is too short a plan horizon given the time it will take to adopt this plan and review/prepare another. On the basis that the plan making process will not be complete before 2024, the plan period should extend to 2035.

Others are worthy of support:

- Bullet 3: Diverse range of housing needs.

- Bullet 5: Development of accessible community facilities.
- Bullet 6: Accessible environments.
- Bullet 7: Education and other needs (meet, rather than facilitate would be better)
- Bullet 8: Improvement of health and wellbeing

The Council's support for Good Design and Positive Place Making is welcome. The identification of sufficient land to develop provides an opportunity to shape better places but the contents of the POP would suggest that there will be limited opportunity to make new places, particularly in Bangor.

9 Are there any issues that we have missed from our Vision, Aims or Objectives?

Anything omitted?:

None missed but query whether the Council is being ambitious enough.

Key Issue 1- Developer Contributions

10 Do you agree with the aim of Developer Contributions?

Disagree

11 Do you agree with the Approach outlined in the Preferred Options Paper?

Disagree

please add any additional comment:

Developer contributions should only be sought in the circumstances set out in the SPPS and must satisfy the legal tests. The Plan must take care not to introduce a policy that would affect decisions by developers to invest. Development is a voluntary activity. A policy which would discourage development will undermine the ability of the plan to achieve its own objectives since, for a large part, these depend upon delivery by the private sector.

The POP suggests that:

Housing developments would mainly benefit from a developer contributions policy. Key site requirements for a housing zoning could specify the need for a financial contribution by the Developer towards the development or upgrade of nearby play park provision by the Council or other open space.

It would be inappropriate to establish such a key site requirement as the need, or otherwise, for such a requirement would depend upon whether such a development or upgrade was directly related to the new housing sought. This judgement would be informed by whether the proposed housing was of an appropriate scale and whether it was making its own provision integral to the new housing itself.

. Identifying sites where developer contributions would be required would not be sound because it would prejudice an assessment that would be best made during the development management process.

The statement that 'In order to facilitate development through contributions, so that it does not deter investment, consideration will also be given to the exact level of developer contributions.' confirms the importance of ensuring development remains viable. To set developer contribution requirements through the plan making stage would necessarily require engagement in a level of detail which is not yet available. Many other factors are at play in viability, such as the abnormal costs, infrastructure requirements and the costs and values of a development. These would be unknown at zoning stage and could also change during the lifetime of the plan.

Unfortunately whilst, as the Council's assessment of Option 1b recognises, there will be resource implications for the Council in assessing the need for developer contributions on a case by case basis, it is a better option than the preferred option and is not an unusual requirement for local planning authorities.

Key Issue 2: Spatial Growth Strategy -Settlement Hierarchy

12 Do you agree with the preferred option?

Agree

13 Do you think the existing settlement hierarchy should be maintained or that settlements should be re-classified within the hierarchy and new settlements identified?

please add any additional comment:

No issue provided the reclassification of, for example, Ballygowan or Portaferry does not affect the potential for additional growth in the larger towns.

Consideration should be given to a clearer distinction between Bangor and Newtownards.

NB the language used on page 45 tends towards the negative in respect of towns/large towns – "containing". Also, whilst there is a relatively positive interpretation of the RDS' Regional Strategic Guidance for Newtownards, the equivalent analysis for Bangor is noticeably less positive notwithstanding the fact that Bangor is located within the BMUA rather than clustering with it.

14 Do you agree with the indicative settlement hierarchy shown in the Preferred Options Paper?

Disagree

15 Do you have any suggested changes?Are there any new settlements that you think should be considered?

please add any additional comment:

No new settlements but consideration should be given to a higher position in the hierarchy for Bangor given its scale, range of services and location within the BMUA.

16 Do you have any comments on the Spatial Growth Strategy- Economic Development?

Spatial Growth Economic Development Q:

Agree with the thrust of the strategy in promoting major employment opportunities in the main towns; however this needs to be carefully considered in tandem with housing allocations. In deriving the housing numbers, did Council given consideration to the level of new jobs to be created and the homes that would be required within the main towns to facilitate this level of growth?

Key Issue 3 :Housing Allocation

17 Do you agree with the preferred option?

Disagree

18 Do you have any suggested changes?Are there settlements that you think should receive a higher, lower housing allocation?

please add any additional comment:

No. We fundamentally disagree with this preferred option. It is unsound in both its approach to housing need and supply side assumptions.

Housing Need

While the Council has ostensibly sought to meet housing needs in full, it has limited its assessment of the scale of this need – and as such, the proposed housing requirement – to the Housing Growth Indicator (HGI) published by the Department for Infrastructure in 2016.

Whilst it is agreed that the HGI is an important reference point in establishing a locally evidenced requirement, they are produced only 'as a guide for the preparation of the LDP' as correctly acknowledged by the Council within the POP.

The POP claims that the 'proposed strategy will deliver the housing that is needed within the borough', yet it is unclear how this conclusion has been reached in the absence of evidence on the actual housing needs of Ards and North Down, beyond the citing of the HGI. This is not covered in any of the 17 Position Papers published by the Council alongside the POP, despite individual papers focusing on "Population and Housing" and the "Housing Allocation".

The proposed level of housing provision does not appear to have been considered in the context of baseline forecasts which suggest that 4,500 jobs are likely to be created in the borough over the plan period, nor the Council's objective to create 7,500 jobs by 2030 .

Furthermore, the HGI is predicated upon an average level of annual population growth that has been exceeded in all but three of the past fifteen years.

Housing Supply

The housing land supply should have been assessed before now to determine whether additional housing land is required.

A comparison of housing land availability information for Bangor shows that there is land for over 3,000 units remaining. Considering the number of houses built in the five year period from 2013 to 2018, this would suggest the availability of an adequate and continuous supply of land which could serve the town well into the new Plan period.

When reviewed on a site by site basis, however, the data shows that a very significant number of the monitored sites (around two thirds) did not deliver any houses in the period between the two housing monitors. Whilst it is accepted that some of these sites may now be delivering housing, to ensure the delivery of a sound plan, it is incumbent on the Council to interrogate the housing land supply data in order to satisfy itself that there is a deliverable supply. This may mean that long standing sites which have not delivered houses are discounted from the housing land supply because they cannot be relied upon. With evidence suggesting housing completions have increased in recent years, the supply of deliverable housing land in the larger sites will be exhausted well before the stated end date of the Plan.

The data also clearly shows that a large number of the housing monitor sites are small scale, with an equivalently low yield. Whilst we appreciate the importance of windfall and urban capacity sites in the context of an overall housing land supply, the LDP's housing strategy should not over rely on this source of potential supply to the exclusion of larger sites owned by housebuilders or willing landowners which can make a significant and consistent contribution to the town's housing requirements over the plan period.

The POP should have proposed and assessed options on the basis of this evidential context, not proposed an option involving the assessment of information which is already available.

Bangor should have a higher housing allocation. Bangor is one of the largest towns in Northern Ireland. The Northern Ireland Statistics & Research Agency (NISRA) Review of the Statistical Classification and Delineation of Settlements Report (March 2015) identified Bangor as the third largest Band C (Large Town) settlement in Northern Ireland by population. Taking account of Belfast (Band A) and Londonderry (Band B), this means that Bangor is the fifth largest settlement in Northern Ireland. With a 2011 Census population of 61,401 Bangor is more than twice as large as Ards & North Down's other Band C settlement - Newtownards (population 28,039).

The town clearly has a scale, critical mass and infrastructure at the upper end of Northern Ireland's settlement hierarchy. It is an important settlement in its own right as well as having a functional relationship with Belfast and the wider BMUA. Its housing strategy and final housing allocation needs to be:

- (i) Proportionate to its scale within the Borough;
- (ii) Geared to support the growth of its employment base to try as far as possible to reduce commuting to Belfast;
- (iii) Sufficient to support the regeneration of its waterfront and town centre.

Increasing the housing allocation to Bangor would be consistent with the direction of travel flagged in the Sustainability Appraisal Interim Report which attached importance to consideration of the current distribution of population, services and facilities and providing provide good quality, sustainable housing in the medium to long term.

In the absence of a step change in the delivery of new housing in Bangor, continuity of the trend towards an ageing population will tend towards 'managed decline' rather than 'modest growth', both of which would fall well short of the medium level of growth that it has been recognised as requiring.

Key Issue 4- Energy

19 Do you agree with the Council's Preferred Option?

Not Answered

20 Do you agree with the Council's approach in relation to wind turbines in sensitive landscapes?

Preferred Option 4b:

Key Issue 5- Energy

21 Do you agree with the preferred option?

Not Answered

22 Do you agree with the Council's approach that all new development proposals should demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated into the design?

Not Answered

integration renewable generation:

Key Issue 6- Urban Rural Housing

23 Do you agree with the Preferred Option?

Don't know

Key Issue 7- Urban and Rural Housing

24 Do you agree with the preferred option?

Agree

25 Do you agree with the Council's preferred option for addressing affordable housing need in the Borough?

please add any additional comment:

Yes, the delivery of affordable housing is a key outcome of the plan process. Because of the level of committed housing sites, the allocation of new land will make an important contribution to the delivery of affordable housing.

Key Issue 8- Urban and Rural Housing

26 Do you agree with the preferred option?

Disagree

27 Do you think the LDP should direct a proportion of Lifetime Homes to be included in new development?

please add any additional comment:

The Council references the importance of Lifetime Homes in the context of an ageing population, however no housing need figure for such provision has been provided. A better, more sustainable approach to address specific housing needs would be to identify housing requirements for special housing and provide planning policies to support their development.

Furthermore the provision of housing that is bespoke to specialist needs would free up other forms of housing for families etc. For example whilst a family house could be adapted to accommodate an elderly person, would they wish to live in a large house or should consideration be given to the provision of bespoke accommodation which would enable family housing to be freed up.

Rather than introduce an arbitrary requirement, the council should undertake a detailed analysis of the housing stock and the future housing need to ensure that housing developments in the future provide for a suitable range of housing styles and size. This approach would be better aligned with the measures that should be contained within the LDP, as outlined at paragraph 6.142 of the SPPS.

Key Issue 9- Open Space, Sport and Outdoor Recreation

28 Do you agree with the preferred option?

Not Answered

29 Do you think that 'exceptional circumstances' should be considered on a case by case basis, or should the LDP specify those instances in which it will apply?

please add any additional comment:

30 Should the existing open space zonings be re-evaluated to allow for possible development as another use?

please add any additional comment:

Key Issue 10- Open Space, Sport and Outdoor Recreation

31 Do you agree with the Council's approach to Greenways?

please add any additional comment:

Key Issue 11- Public Services, Health and Wellbeing

32 Do you agree with the proposed option?

Agree

33 Do you agree with the Council's approach to identify and safeguard lands to meet the anticipated needs of the community, in terms of health, education and other public services and facilities?

Agree

please add any additional comment:

Key Issue 12- Public Services , Health and Wellbeing

34 Do you agree with the preferred option?

Not Answered

35 Do you consider the preferred Option is appropriate?

please add any additional comment:

36 Are there any other ways the LDP can help contribute to improving the health and wellbeing of our residents?

please add any additional comment:

Key Issue 13- Public Services, Health and Wellbeing

37 Do you agree with our proposed approach to encourage mitigation measures to be included with any public utility planning applications?

Not Answered

please add any additional comment:

Key Issue 14- Public Utilities

38 Do you agree with the preferred option?

Not Answered

39 Do you agree with our proposed approach to safeguard specific locations for end of life development within the Borough?

please add any additional comment:

Key Issue 15- Public Utilities

40 Do you agree with the preferred option?

Not Answered

41 Do you agree with our proposed approach in line with the Waste Management Strategy?

please add any additional comment:

Key Issue 16- Coastal Management

42 Do you agree with the preferred option?

Not Answered

Key Issue 17- Coastal Management

43 Do you agree with the preferred option?

Not Answered

44 Are there any settlements in AND in addition to Bangor which should have a designated Urban Waterfront? If so, which settlements?

please add any additional comment:

Key Issue 18- Coastal Change

45 Do you agree with the preferred option?

Not Answered

Key Issue 19- Flooding and Drainage

46 Do you agree with the preferred option?

Not Answered

Key Issue 20- Flooding and Drainage

47 Do you agree with the preferred option?

Not Answered

Key Issue 21- Historic Environment

48 Do you agree with the preferred option?

Not Answered

49 Do you agree with this approach to the preservation of our historic environment?

please add any additional comment:

Key Issue 22- Historic Environment

50 Do you agree with the preferred option?

Not Answered

51 Are there any local buildings or landscape features that you think should be recognised in a Local Heritage List?

Not Answered

52 If so what are they and why should they be included?

please add any additional comment:

Key Issue 23- Natural Environment

53 Do you have any comments on this Issue?

please add any additional comment:

Key Issue 24- Natural Environment

54 Do you agree with the preferred option?

Not Answered

Key Issue 25- Natural Environment

55 Do agree with the proposed option?

Not Answered

56 Are there certain areas within the AONB that are particularly sensitive to certain types of development?

please add any additional comment:

57 ■ How should the LDP respond?

please add any additional comment:

Key Issue 26- Employment and Industry

58 Do you agree with the preferred option?

Not Answered

59 Do you agree with the approach to evaluate existing zonings for economic/employment land and identify new sites?

please add any additional comment:

60 ■ Where should new sites be located?

please add any additional comment:

Key Issue 27- Employment and Industry

61 Do you agree with the preferred option?

Not Answered

62 Do you agree that the LDP should identify sites particularly suitable for business start-ups and flexible co-working spaces?

please add any additional comment:

63 ■ Where should these be located?

please add any additional comment:

Key Issue 28- Employment and Industry

64 Do you agree with the preferred option?

Not Answered

please add any additional comment:

Key Issue 29- Employment and Industry

65 Do you agree with the preferred option?

Not Answered

66 Do you agree with a more flexible approach to allow B1 Business uses within certain district centres and economic/employment zonings?

please add any additional comment:

Key Issue 30- Employment and Industry

67 Do you agree with the preferred option?

Not Answered

68 Do you agree with the proposed approach to safeguard against the loss of economic/ employment land but permit alternative employment uses where these are compatible with existing uses within the area?

please add any additional comment:

Key Issue 31- Minerals

69 Do you agree with the preferred option?

Not Answered

Key Issue 32- Town Centres and Retailing

70 Do you agree with the preferred option?

Not Answered

71 Do you agree with the proposed approach to define a hierarchy of centres?

please add any additional comment:

72 Are there any retail areas serving local need which should be designated as local centres?

please add any additional comment:

Key Issue 33- Town Centres and Retailing

73 Do you agree with the preferred option?

Not Answered

74 Do you agree with the proposed approach to define the spatial extent of Town Centre boundaries and Primary Retail Cores?

please add any additional comment:

75 Should the LDP reduce or increase the extent of any town centre or primary retail core boundaries?

please add any additional comment:

Key Issue 34- Town Centres and Retailing

76 Do you agree with the preferred option?

Not Answered

77 Do you agree with the proposed town specific approach to policy within Primary Retail Cores to reflect the locally distinct character of each town within the Borough?

please add any additional comment:

Key Issue 35- Town Centres and Retailing

78 Do you agree with the preferred option?

Not Answered

79 Do you agree with the proposed approach to protect existing areas of housing within town centres?

please add any additional comment:

Key Issue 36- Town Centres and Retailing

80 Do you agree with the preferred option?

Not Answered

81 Do you agree with our proposed approach to Development Opportunity Sites?

please add any additional comment:

Key Issue 37- Tourism

82 Do you agree with the proposed option?

Not Answered

Key Issue 38- Transportation

83 Do you agree with the preferred proposal?

Not Answered

84 Do you agree with the proposed approach to place the onus on applicants to demonstrate that sustainable transport and active travel has been considered in all new development proposals?

please add any additional comment:

Key Issue 39- Transportation

85 Do you agree with the preferred option?

Not Answered

86 Do you agree with the proposed approach to identify sites suitable for Park and Ride / Park and Share facilities?

please add any additional comment:

Key Issue 40- Transportation

87 Do you agree with the preferred option?

Not Answered

88 Do you agree that areas of parking restraint should be introduced within town centres and, if not, why?

please add any additional comment:

Key Issue 41- Transportation

89 Do you agree with continuing to protect proposed routes for future transport schemes that are identified in extant Development Plans?

Not Answered

Key Issue 42- Transportation

90 Do you agree that disused transport routes should be identified and safeguarded for future use for transport or recreational, nature conservation or tourism related uses?

please add any additional comment:

Sustainability Appraisal -Interim Report

91 Do you have any comments on the content or findings of the Sustainability Appraisal Interim Report?Please quote the Issue number or Topic in your response

please add any additional comment:

Whilst we agree with some of the preferred options, the SA process in relation to the Spatial Growth Strategy is flawed. As presented, the Interim SA raises concerns with regards to its process and content which can be summarised as follows:

- There is a failure of the SA Process to meet the requirements of the EAPP Regulations in the development and justification of the options assessed in relation to Strategic Growth in Ards and North Down Borough;
- There is a failure to consider all reasonable alternatives for housing allocation as it relates to an up to date evidence base and proposed settlement hierarchy; and
- The non-technical summary within the Interim SA report fails to meet the information requirements of Schedule 2 within the EAPP Regulation

Preliminary Review of Operational Planning Policy

92 Do you have any comment to make on the Planning Policy Review document?

please add any additional comment:

Other Ards and North Down Borough Council Documents

93 Did you respond to the Council's engagement on

Additional Comment:

Appendix 2: Settlement Analysis of Bangor & Newtownards

Settlement Evaluation

July 2019

Newtownards

Newtownards			
Settlement Category	Population (2011 Census)	Area (ha)	No. of dwellings (2011 Census)
Large/Regional Town	28,039		
Overview of Settlement			
<p>Newtownards is located at the head of the Strangford Lough shores, 16 km east of Belfast, 6km south of Bangor and 5km north of Comber. One of the larger towns in Northern Ireland, it functions as both a commuter town for the Belfast Metropolitan Urban Area and the main centre for a large rural hinterland given its proximity and road connectivity to Belfast and location at the gateway to the Ards Peninsula. Newtownards does not benefit from a train line, so commuting is principally by car via the A20 Kempe Stones Road and other routes. Newtownards' location on the shores of Strangford Lough, Scrabo Tower and Killynether Woods and Londonderry Park offer outdoor recreation and open space. Further services and facilities include a wide range of health, education, retail, commercial leisure, and sport and recreation provision, reflective of the settlement's position within the RDS Settlement Hierarchy as a Regional Town (Level 3).</p>			
RDS Settlement Evaluation Framework			
Resource Test	<p>All households have access to a clean water supply as well as having waste/sewage disposal connection to the mains sewer flowing to Newtownards WWTW. Sewer network modelling has identified wastewater network capacity issues within Newtownards Settlement Limit resulting in new connections being declined in parts of the catchment area. Superfast broadband, natural gas connection and 4G mobile data coverage is available throughout the settlement. The settlement contains further education facilities, primary and secondary schools, a community hospital, pharmacies, health centres, day care centres, a leisure centre and multiple sporting facilities, supermarkets, a mix of retail centres, a range of restaurants, tourism projects, a police/fire/ambulance station, waste disposal sites, and industrial/business centres. In relation to the RDS Settlement Hierarchy and Related Infrastructure Wheel, Newtownards possesses a significant amount of the resources and facilities which are found at Level 3 (Regional Towns).</p>		
Environmental Capacity Test	<p>Newtownards is situated 16km east of Belfast, 6km south of Bangor and 5km north of Comber. It is set within a natural saucer shaped depression defined by the steep volcanic backdrop of Scrabo Hill to the south-west and the Holywood Hills and Whitespots Ridge to the north and the drumlins at Movilla and Bowtown to the east. Its setting is further distinguished by its position at the head of the Strangford Lough shores. Consequently, this area has multiple nature conservation interests and designations. The Lough is designated as Strangford Lough Ramsar Site. The Lough and surrounding areas are designated as Strangford and Lecale Area of Outstanding Natural Beauty which borders onto the southern and western Settlement Limit. Strangford Lough, Whitespots and Scrabo are designated as Areas</p>		

	<p>of Special Scientific Interest (ASSIs). There are four sites of Local Nature Conservation Importance (SLNCI) designated within the settlement located at Ballyharry, Golden Glen, Gregstown and Kiltonga. There are five Local Landscape Policy Areas (LLPAs) including Kiltonga, Lieutenant Hill, Whitespots, Scrabo Tower and Drumlins. A bird sanctuary and Golden Glen located at Crawfordsburn Road and Wildfowl refuge located in Kiltonga. The ability of Newtownards to absorb further significant urban growth – beyond planned limits - is influenced by these environmental designations. The designated Settlement Limits protects the setting of Stangford Lough, Scrabo Town and Whitespots.</p>
Transport Test	<p>Newtownards is strategically located on the Regional Strategic Transport Network, benefitting from access to Bangor via the A21 Bangor Road, Comber via the A21 Comber Road, and Belfast via the A20 Kempe Stones Road, a key Link Corridor. Newtownards does not benefit from a train line, however, multiple bus services operate within the town, offering journeys down the peninsula and to Belfast City Centre. Newtownards is located at the intersection of a number of routes and is the gateway to the Ards Peninsula resulting in the road system carrying a high proportion of through traffic in addition to traffic generated within the town. A series of largely developer-led link roads around the eastern side of the town to provide connectivity from Bangor Road to Portaferry Road are planned as part of the development of large housing zonings but it is likely to be many years before the full orbital route is complete. The settlement provides good opportunity for walking and cycling with the National Cycle Network 93 North Down connecting Bangor to Newtownards. Newtownards is located 14.5km from Belfast City Airport, 45km from Belfast International Airport and 20km from Belfast Stenaline terminal. Newtownards Airport is one of only 5 licensed airports in northern Ireland. It offers landing facilities for light aircraft and helicopters.</p>
Economic Development Test	<p>In addition to its well established town centre, which includes representation from independent retailers, Newtownards has a district centre (Ards Shopping Centre) which provides a range of high street retail names including Next, Argos and Boots as well as large retail units offering comparison goods such as Asda and Iceland. Castlebawn Retail Park consists of a number of large retail units including a 24-hour Tesco Extra, Matalan and Home Bargains. Together these centres play an important role in providing shoppers with convenience and non-bulky comparison goods. There are also a range of smaller locations throughout the town providing for the everyday needs of the local population. The Ards and Down Area Plan (ADAP) has a range of lands designated for Employment/Industrial Land Use. ADAP 2015 proposed to zone 27ha of industry/employment land within the proposed Settlement Limit in keeping with the status of Newtownards as a main hub and to allow it to develop as a major location providing employment. The ADAP 2015 notes that ‘of the 47 ha previously zoned for industry within the Ards Borough, approximately 29ha remain undeveloped’. Newtownards is also a focus of Invest NI’s landholdings (a serviced site at Ballyharry, Newtownards – zoning NS 31).</p>
Urban and Rural Character Test	<p>Newtownards is the second-largest town in the Ards and North Down Borough, with a population around half as large as Bangor. A gateway to the Ards Peninsula and Strangford Lough, the town is dominated by Scrabo Hill and its tower which rise dramatically above the alluvial plain at the Lough head. Newtownards occupies</p>

	<p>much of this plain and looks southward towards one of the largest sea loughs in Ireland. The origins of the street layout and urban form of the town centre can be traced back to the 17th Century, when the establishment of a town by Montgomery provided the foundation for today's Newtownards. The Priory Church was refurbished as the parish church and a market place set up marked by a cross at the junction of Movilla Street and Greenwell Street. Its establishment as a market town was further enhanced towards the end of the 17th Century when the town was enlarged by creating a market square and streets laid out in a grid pattern alongside the existing irregular street layout created by Montgomery. The opening of the new coach road from Dundonald via Bradshaw's Brae necessitated changes in street pattern and the focus of attention shifted away from cruciform plan centred on Conway Square to the east-west axis form by the building of Regent Street and Francis Street. More recently, Newtownards has experienced considerable growth, with residential developments expanding northwards (Bangor Road and Crawfordsburn Road), eastwards (Movilla Road, Bowtown Road and Portaferry Road), southwards (Comber Road) and westwards (Belfast Road). Despite the urban growth, Newtownards retains a rich architectural inheritance. Movilla Abbey and Newtownards Priory are State Care Sites while St Marks Church of Ireland Parish Church is a Grade A Listed Building. Court street/Conway Square is designated as an Area of Townscape Character.</p>
<p>Community Services Test</p>	<p>Newtownards is well supplied with resources and facilities, performing a key community service role for its inhabitants, surrounding towns, villages and the rural area. Within the town centre primary shopping core there is a vibrant mix of comparison retail uses with a number of substantial independent businesses. Ards Shopping Centre, on the western periphery of the built up area, performs the role of a District Centre, and is a significant influence upon the commercial character of the town centre. The centre contains two national food retailers and a number of High Street multiples. Planning permission was granted for a 15,190 square metre two-storey extension to the centre to include retail floor space, 4 restaurants, 5 kiosks and a multi-storey carpark. Castlebawn Retail Park is located at the eastern edge of the town and consists of a number of large retail units (including a national food retailer), petrol station and fast food restaurant. These centres co-exist with other smaller shopping areas, mainly situated in the High Street/Francis Street/Regent Street area, which fulfils a complementary role for their local residents. Newtownards is a focus for industrial activity with industries such as engineering, food processing and metalwork clustered in Kiltonga Industrial Estate. Other industrial uses are also located at Glenford Way and North Road. Jubilee Road contains a number of businesses which are open to the public and also government buildings such as Newtownards MOT centre and the Department of Agriculture, Environment and Rural Affairs. Newtownards houses a range of educational facilities including two controlled nursery schools, six primary schools, one grammar school, and a further education campus and the Ards Arena Youth Centre. Ards Blair Mayne Wellbeing and Leisure Complex opened in January 2019. These centres provide a range of adult and kid activities, classes and outdoor recreation as well as facilities suitable for seminars, meetings and parties. Newtownards contains additional facilities including a community hospital, several GP surgeries, dentists, opticians, pharmacies, police/fire/ambulance stations, library, town hall, churches encompassing all the main religious denominations,</p>

tourist information centre, playing fields, play parks multi-screen cinema and a hotel.

Qualitative Analysis

Strengths	<ul style="list-style-type: none"> • Good connection to the transport network via major roads and key Link Corridors (A20 Kempe Stones Road to Belfast, A21 Bangor Road and A21 Comber Road) • Gateway to Ards Peninsula • The Castlebawn Link Road acts as a bypass to the town centre for traffic coming from Comber and heading towards the Peninsula • Located in close proximity to the Belfast Metropolitan Urban Area and George Best Belfast City Airport • The settlement is supported by a significant population base • The settlement is located on the Strangford Lough shores, a designated Area of Outstanding Natural Beauty • The settlement has valuable open space and recreation provision in terms of parks, Scrabo Tower and Country Park, Whitespots Country Park, Ards Blair Mayne Wellbeing and Leisure Complex • A range of employment opportunities exist within the settlement • Ards Shopping Centre and Castlebawn Retail Park offer a vibrant and significant retail source for the population of the settlement and beyond
Weaknesses	<ul style="list-style-type: none"> • Commuting to Belfast and the coalescence of key routes results in the absence of the eastern orbital links results in congestion on some roads at peak hours • Wastewater network capacity issues – limited to no capacity in areas • Gap sites and the slow development of undeveloped land (e.g. Castlebawn Retail Park)
Opportunities	<ul style="list-style-type: none"> • Potential to improve public transport connections to Belfast • Potential to attract further employment uses maximising the location of settlement. • Potential to develop underutilised sites for a variety of uses
Constraints	<ul style="list-style-type: none"> • The opportunity for outward urban expansion is constrained by Strangford Lough to the South, a designated AONB, elevated land and high quality landscapes to the west (Scrabo Tower and Country Park) and to north (Whitespots Country Park) • Coupled with the landscape constraints in some parts of the town, consideration needs to be given to the network capacity problems currently being experienced within the town • Risk of coalescence with Bangor

Settlement Evaluation

July 2019

Bangor

Bangor Town			
Settlement Category	Population (2011 Census)	Area (ha)	No. of dwellings (2011 Census)
Large/Regional Town	61,401	TBC	TBC
Overview of Settlement			
<p>Bangor is located on the southern shores of Belfast Lough, 19.5km east of Belfast City Centre and 6km north of Newtownards. It has critical mass/scale, being the fifth largest settlement in Northern Ireland and forms part of the Metropolitan Urban Area (BMUA) with major road and rail links to Belfast. It is an important retail and commercial centre with a large housing catchment. While the settlement is well provided for by public transport and park and ride facilities, commuting via the A2 Sydenham Bypass to Belfast is common given its close proximity/connectivity to Belfast. Bangor's seaside location, the coastal path and Pickie Fun Park make the town an attractive place to live and act as a tourist draw. There is further potential for waterfront redevelopment in the town as a catalyst for strengthening the town centre. There is a provision of parks, playgrounds and open space at various locations within the built up area including Ward Park and Bangor Castle Walled Garden. Further services and facilities include a wide range of health, education, retail, commercial leisure, sport and recreation provision, reflective of the settlement's position within the RDS Settlement Hierarchy as a Regional Town (Level 3).</p>			
RDS Settlement Evaluation Framework			
Resource Test	<p>All households have access to a clean water supply as well as having waste/sewage disposal connection to the mains sewer flowing to North Down WWTW. Sewer network modelling has identified wastewater network capacity issues within the Settlement Limits of Bangor resulting in new connections being declined in parts of the catchment area. Superfast broadband, natural gas connection and 4G mobile data coverage is available throughout the settlement. A recycling centre is located in Balloo Industrial Estate and is powered by an 80m high wind turbine located at Balloo Wood. The settlement contains further education facilities, primary and secondary schools, minor injuries and outpatient hospital, pharmacies, health centres, day care centres, a leisure centre and multiple sporting facilities, supermarkets, a mix of retail centres, a range of restaurants, tourism projects, police station, waste disposal sites, and industrial/business centres. In relation to the RDS Settlement Hierarchy and Related Infrastructure Wheel, Bangor possesses a significant amount of the resources and facilities which are found at Level 3 (Regional Towns).</p>		
Environmental Capacity Test	<p>Bangor is located on the southern shores of Belfast Lough at the entrance to the Irish Sea and consequently this area has multiple nature conservation interests and designations. The Lough is designated as ; Belfast Lough Ramsar Site, Belfast lough Special Protection Area, Inner Belfast Lough Area of Special Scientific Interest and Outer Belfast lough Area of Special Scientific Interest. Outer Ards (Helen's Bay to</p>		

	<p>Bangor Marina), Copeland Islands, Ballymacormick Point and Blaeberry Bog are designated as Areas of Special Scientific Interest (ASSIs). There are four sites of Local Nature Conservation Importance (SLNCI) designated within the settlement limit, located at Carnalea Glen and Slopes, Clandeboye Estate, Glenganagh Estate and Rathgael. There are 14 Local Landscape Policy Areas (LLPAs)(BR18-BR31) including Brice Park, Kilcooley Wood, Stricklands Glen and Wilson’s Point. Areas of Townscape Character are designated in Bangor West, East and Central. Bangor Marina has been designated as an Urban Waterfront. The coastal area follows the coastline within the town with a break at the urban waterfront.</p>
<p>Transport Test</p>	<p>Bangor is strategically located on the Regional Strategic Transport Network, benefitting from access to Belfast via the A2 Sydenham Bypass and Newtownards via the A21 Bangor Road. A train line serves the settlement, providing regular journeys Monday-Sunday to and from Belfast and connecting to the Dublin rail line and all other NIR lines. Two train halts are present within the settlement, located at Bangor train station and Bangor West. Additionally, multiple bus services operate from and within the town. Despite a number of public transport options being available including Park and Ride facilities on Abbey Street and Dufferin Avenue, the settlement still relies heavily on use of the car with private car ownership being higher within the Ards and North Down Borough than within Northern Ireland as a whole. This reflects the high level of commuting to Belfast. The settlement provides good opportunities for walking and cycling with the National Cycle Network 93 North Down connecting Bangor to Newtownards. Bangor is located 16km from Belfast City Airport, 48km from Belfast International Airport and 25km from Belfast Stenaline terminal.</p>
<p>Economic Development Test</p>	<p>Bangor has a large town centre enjoying a waterfront location. There are high profile redevelopment opportunities within the town centre, particularly at Queen Parade, where plans are being brought forward for a mixed use scheme on a key opportunity site. Bloomfield (District) Shopping Centre is located within the Bangor settlement limit and provides a range of high street retail names including Next, River Island and Boots as well as large retail units offering comparison goods such as Tesco and Marks and Spencer. Balloo Retail Park, adjacent to Bloomfield Shopping Centre, consists of a number of large retail units including Sainsbury’s and Homebase. Springhill Retail Park, located to towards the western boundary of the Settlement Limit, also consists of a number of large retail units including a 24-hour Tesco Superstore, Sports Direct and Starbucks Coffee. Together these retail centres play an important role in providing shoppers with convenience and non-bulky comparison goods. There are also a range of smaller locations throughout the town providing for the everyday needs of the local population. Draft Belfast Metropolitan Area Plan (dBMAP) has a range of land designated for Employment/Industrial Land Use. Bangor is considered one of two strategic locations for employment/industrial development within the Borough. Bangor is a focus of Invest NI’s landholdings (a serviced site at Balloo South Industrial Estate, Ballyhenry – zoning BR08). The dBMAP proposed to zone 112ha of industry/employment land within the proposed Settlement Limit to take advantage of its strategic location and close proximity to Belfast Metropolitan Area.</p>

<p>Urban and Rural Character Test</p>	<p>Bangor is located on the southern shores of Belfast Lough at the entrance to the Irish Sea. It is the largest settlement in Ards and North Down Borough. The settlement has monastic origins but its present form and character largely reflects its growth as a seaside resort in the late 19th and early 20th Centuries. It was during this period that many of the hotels, guesthouses and other forms of holiday accommodation were built in terraces around Bangor Bay. The town could be considered a dormitory settlement for Greater Belfast due to its proximity to the City and its attractive coastal location. There are large amounts of private housing to the south and east of the town centre, off the ring-road, along with expansion of existing retail parks/shopping centres at Bloomfield, Clondeboye and Springhill. Despite these changes, Bangor still retains its seaside character and possesses a rich and extensive architectural inheritance. Bangor East, Bangor West and Bangor Central are designated as Areas of Townscape Character. Bangor is home the Historic Garden of Bangor Castle located in Bangor Central. Bangor Town Hall is a Grade A Listed Building. A number of design issues within Bangor Settlement Limit have been identified including the impact of the roads infrastructure which has, particularly around the town's ring road, created physical and visual severance.</p>
<p>Community Services Test</p>	<p>Bangor is well supplied with resources and facilities, performing a key community service role for its inhabitants, surrounding towns, villages and the rural area. Within the town centre primary shopping core there is a good mix of comparison retail uses with a number of independent businesses. Primary frontage for comparison goods retailing is along Main Street. Bloomfield Shopping Centre and Balloo Retail Park, located off the A2 ring-road, are significant influences upon the commercial character of the town centre, as well as Spring Hill Retail Park located to the west comprising of two national food retailers and a number of High Street multiples. Industrial uses are also located at Balloo, Greenway and Enterprise Road. Bangor is served by a number of primary and secondary schools, a Special Needs School, as well as housing the Bangor campus of South Eastern Regional College and a performing arts centre. Bangor contains an extensive range of catering and leisure facilities – a notable addition to the leisure sector being the Aurora Aquatic and Leisure Complex in the grounds of Bangor Castle. The centre provides an Olympic sized swimming pool as well as sports pitches, leisure waters and gym equipment. Various sporting clubs are located within the settlement limits including Royal Ulster Yacht Club and Bangor Golf Club. Recent improvements to the recreational facilities at Pickie Fun Park include miniature golf, go-karting and an enlarged and upgraded pool with pedal boats and café. Additionally, the coastal path and walled garden with Bangor Castle ground continue to be a well-utilised recreational facility and a key tourist draw. Bangor comprises further facilities including a minor injuries and outpatient hospital, several GP surgeries, dentists, opticians, pharmacies, police station, library, town hall, churches encompassing all the main religious denominations, tourist information centre, playing fields, play parks, a multi-screen cinema and hotels.</p>
<p>Qualitative Analysis</p>	
<p>Strengths</p>	<ul style="list-style-type: none"> • Excellent connection to the transport network via major roads (A2 Belfast Road and A21 Newtownards Road), train line and bus services as well as George Best Belfast City Airport.

	<ul style="list-style-type: none"> • Easy access and connectivity to Belfast and the wider Belfast Metropolitan Urban Area, the main conurbation in Northern Ireland. • The settlement is supported by a very significant population base in Northern Ireland terms. • The settlement is an attractive and popular place to live, given its facilities, amenities and location. • A range of employment opportunities exist within the settlement. • Bloomfield Shopping Centre, Balloo Retail Park, Spring Hill Retail Park offers a vibrant and significant retail source for the population of the settlement and beyond.
Weaknesses	<ul style="list-style-type: none"> • Commuting to Belfast for employment reinforces the role of dormitory town. • Gap and underused sites in prominent positions within the town centre.
Opportunities	<ul style="list-style-type: none"> • Growth opportunities given the attractiveness of the town. • Potential to grow the economic and tourism base. • Potential to develop key underutilised sites for a variety of uses.
Constraints	<ul style="list-style-type: none"> • Opportunity for outward development constrained by Belfast Lough to the north, Clondeboye Estate to the south-west and proximity to Crawfordsburn, Groomsport and Newtownards.

Appendix 3: Review of Evidence Underpinning the Housing Strategy

Critique of the Evidence Underpinning the Housing Growth Strategy

Ards and North Down Local Development Plan Preferred Options Paper

Introduction and Scope of this Technical Critique

1. This report has been prepared by Turley to critically review the evidence which underpins the level of housing growth proposed in Ards and North Down, within the Local Development Plan Preferred Options Paper¹ (POP) published for consultation until 9 August 2019.
2. It recognises that the POP represents the start of a plan-making process for Ards and North Down Borough Council ('the Council'). Nonetheless, the Department for Infrastructure has confirmed that a POP should contain:

*"...a sufficient level of detail / technical evidence about the various options to enable a clear understanding of the different outcomes of options considered and how a Council's preferred options are justified"*²

3. It has also specified that:

*"As surveying and information gathering will be an ongoing process, a council should regularly review its findings to ensure that the evidence remains reliable and up to date"*³

4. This critique is therefore intended to assist the Council in its future preparation of the Local Development Plan (LDP), concluding with a series of recommendations to inform ongoing development of the evidence base. This recognises that the '*strategy, policies and allocations*' of the LDP must be '*founded on a robust evidence base*', if it is to ultimately be found sound⁴.

Housing Growth Strategy and Supporting Evidence

5. The POP represents the first stage in the process of preparing an LDP for Ards and North Down. It establishes the main planning issues to be addressed through the LDP, and sets out the preferred approach to addressing such issues.
6. It identifies a series of challenges facing the borough⁵, including:
 - The need to support the local economy so that local businesses can thrive and grow. There is also an ambition to promote employment opportunities within the borough to enable residents to work locally;

¹ Ards and North Down Borough Council (March 2019) Local Development Plan Preferred Options Paper

² Department for Infrastructure (April 2015) Development Plan Practice Note 5 – Preferred Options Paper, paragraph 8.7

³ *Ibid*, paragraph 6.7

⁴ Department for Infrastructure (May 2017) Development Plan Practice Note 6 – Soundness, version 2 (CE2)

⁵ Ards and North Down Borough Council (March 2019) Local Development Plan Preferred Options Paper, p10

- Relatively high house prices, which have caused affordability issues for younger people in particular; and
 - A recognition that housing development will be required to meet the needs of an increasingly ageing population.
7. Within this context, a series of strategic objectives are identified⁶, which indicate that the LDP will aim to *inter alia*:
- Provide a sufficient supply of land for new housing to meet housing needs up to 2030;
 - Facilitate sustainable development that supports a vibrant economy; and
 - Ensure an adequate provision of accessible land for a range of employment uses which offers a choice of sites at a range of locations.
8. While the Council has ostensibly sought to meet housing needs in full, it has limited its assessment of the scale of this need – and as such, the proposed housing requirement – to the Housing Growth Indicator (HGI) published by the Department for Infrastructure in 2016.
9. Whilst it is agreed that the HGI is an important reference point in establishing a locally evidenced requirement, they are produced only ‘*as a guide for the preparation of the LDP*’ as correctly acknowledged by the Council within the POP. The POP further recognises that it is ‘*the LDP process*’ itself that is ‘*the principal mechanism for assessing future housing land requirements across Ards and North Down Borough*’⁷.
10. The latest published HGI implied that 7,100 homes would be needed in Ards and North Down between 2012 and 2025, equivalent to 546 dwellings per annum on average. Based on this annual figure, the Council has proposed a requirement for 8,190 homes over the period to be covered by the LDP (2015 – 2030). No alternative option is presented, as noted above.
11. The POP later claims that the ‘*proposed strategy will deliver the housing that is needed within the borough*’⁸, yet it is unclear how this conclusion has been reached in the absence of evidence on the actual housing needs of Ards and North Down, beyond the citing of the HGI. This is not covered in any of the 17 Position Papers published by the Council alongside the POP, despite individual papers focusing on “Population and Housing” and the “Housing Allocation”.
12. As such, there appears to have been no consideration or interrogation of whether the HGI accurately reflects the factors that are likely to generate a need for housing in Ards and North Down. For example, there has been no consideration as to whether such a level of provision would be sufficient to address housing affordability pressures, despite their recognition as a key issue in the borough. It is also unclear whether the HGI would support the local economy and provide the labour force required for businesses to grow and thrive, or instead act as a constraint to this growth.

⁶ *Ibid*, p30-32

⁷ *Ibid*, p49

⁸ *Ibid*, p60

13. In respect of the latter, the proposed level of housing provision does not appear to have been considered in the context of baseline forecasts which suggest that 4,500 jobs are likely to be created in the borough over the plan period, nor the Council's clear ambition to create 7,500 jobs by 2030⁹. This is despite the ambition being central to the Council's Integrated Strategy for Regeneration, Economic Development and Tourism. As such, although the Council states that *'the LDP, through supporting policies, will seek to facilitate such jobs growth'*¹⁰, it has not explored the potentially critical role of housing provision in supporting the realisation of this ambition.
14. The consequences of such omissions are explored further below, based on a high level review of the likely drivers of future housing need in Ards and North Down.

Understanding Drivers of Housing Need over the Plan Period

Demographic pressure

15. Population growth will be a key driver of housing need in Ards and North Down. Reliance on the latest HGI, as currently proposed, assumes that the borough's population will grow to the extent implied by the 2012-based population projections, given that the 2012-based household projections continue to underpin the latest HGIs at the time of writing¹¹.
16. These population projections were released over four years ago, in October 2014. The Northern Ireland Statistics and Research Agency (NISRA) has subsequently continued to estimate the population of districts throughout Northern Ireland, with such estimates available for the period up to and including 2017 at the time of writing¹². This reveals that the population of Ards and North Down has actually grown at a faster rate than anticipated by the 2012-based projections, over the past five years.
17. The 2012-based population projections anticipated that the borough's population would grow by 1,678 people during this period (2012 – 2017), growth of circa 1.1%. Population estimates indicate, however, that the population actually grew by 2,461 persons, at a faster rate of 1.6%. As shown in the following chart, this divergence has been increasingly seen over the past three years.

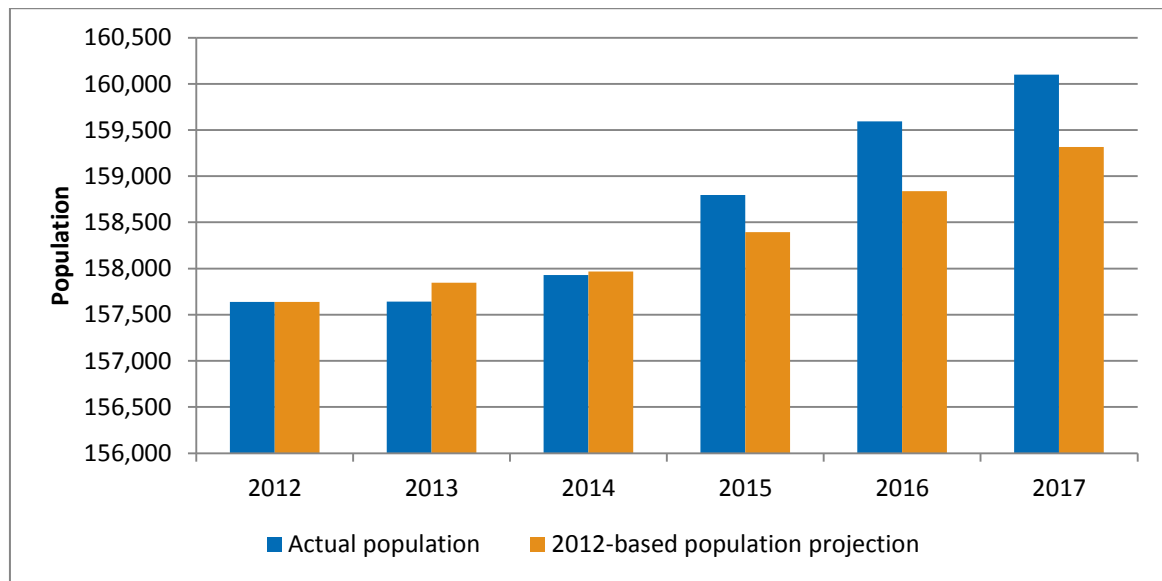
⁹ *Ibid*, p66

¹⁰ *Ibid*, p62

¹¹ Department for Infrastructure (2016) 2012 based Housing Growth Indicators and methodology paper

¹² This note was produced before the publication of 2018 population estimates on 26 June 2019. As such, the estimate for 2018 is not included in this analysis

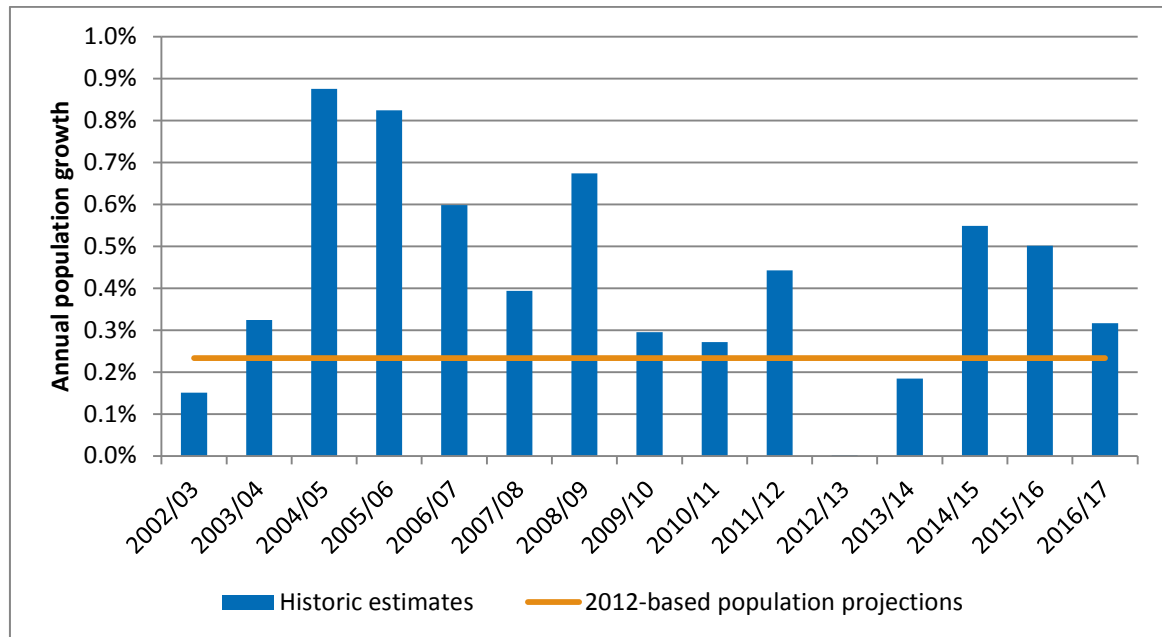
Figure 1: Actual Population Growth vs 2012-based Population Projections in Ards and North Down, 2012-2017



Source: NISRA

18. Put simply, since 2012, the population of Ards and North Down has grown by almost half as much again beyond the level anticipated in the projections. This demonstrates, on the basis of demographic evidence alone, the justification for a closer interrogation of these projections and therefore the HGIs.
19. It can also be seen that historic annual rates of population growth largely exceed that which is forecast over the plan period by the 2012-based projections. For example, over the past fifteen years (2002 – 2017), the population of Ards and North Down grew by an average of 660 people per annum, at an average rate of 0.4% per annum. The 2012-based population projections, however, suggest that the population will grow by only 280 people per annum. This translates to an annual average growth rate of 0.2%, around half the rate that was recorded over the previous fifteen year period. As shown in the following chart, population growth in Ards and North Down has exceeded this rate in all but three of the past fifteen years. Whilst it is recognised that future population change is influenced by a combination of demographic factors, including for example the impact of an ageing of the population and future fertility rates, the scale of this apparent moderation of future growth should, it is suggested, have been subjected to further investigation by the Council in its evidence base.

Figure 2: Comparing Historic and Projected Population Growth in Ards and North Down¹³



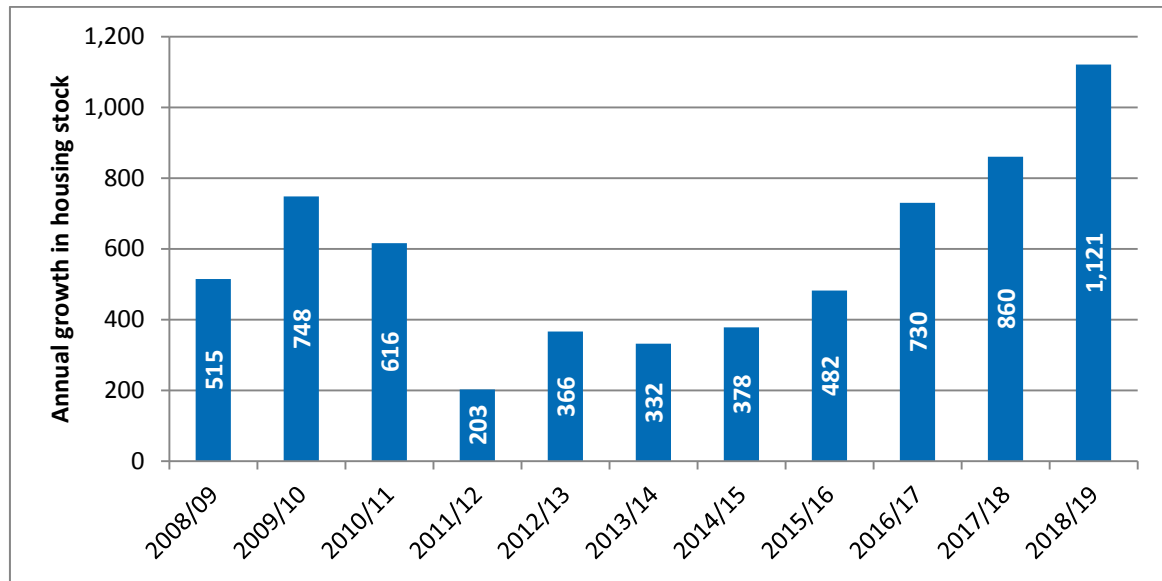
Source: NISRA

20. The 2012-based projections derive trends from a five year historic period back from 2012, and this notably includes at least three years (2009 – 2012) where population growth rates have been comparatively low when set in the context of years prior to the recession. Furthermore, these lower rates of growth have been sustained through to at least 2014, and therefore would result in subsequent trend-based projections continuing to extrapolate forward a more suppressed level of growth.
21. It is also of note that where the population of Ards and North Down has grown at its slowest rates in recent years (i.e. between 2012 and 2014) further interrogation indicates that this is likely to have been influenced by a marked slowdown in the growth of the housing stock¹⁴. As shown in the following chart, housing growth in 2011/12 was over two thirds lower than the preceding year, with growth subsequently remaining at a level that was around half the recent peak. This will have limited the borough’s ability to accommodate population growth, creating a potentially misrepresentative trend in population estimates and – as a consequence – projections.

¹³ The population grew only fractionally (0.002%) in 2012/13; this is shown on the chart and has not been omitted, as appears

¹⁴ Department of Finance (2019) Annual housing stock statistics

Figure 3: Net Additional Dwellings in Ards and North Down, 2008/09 – 2018/19



Source: Department of Finance, 2019

22. The above also reveals an improving trend in housing growth, culminating in a rate of increase over the past two years (2017 – 2019) which exceeds that recorded in any of the preceding nine years. Importantly, this is yet to be captured by official population estimates, which have a time lag and run only to 2017 at the time of writing. Given this increase, it is considered likely that future population estimates will show a return to stronger growth in Ards and North Down. This should be monitored by the Council in appraising the extent to which demographic projections, as used in the HGI, are fully representative of likely future growth and housing needs.

A growing economy

23. The economy of Ards and North Down is growing, with 2,772 additional employee jobs created over the past five years alone¹⁵ (2012 – 2017). This is comparable to the rate of job growth achieved across Northern Ireland over this time (both 7.7%), and equates to around 554 jobs per annum.
24. The POP describes the Council’s ambition to have created 7,500 jobs by the end of the plan period. This is based on the Integrated Strategy for Regeneration, Economic Development and Tourism (‘the Integrated Strategy’) which is intended to provide ‘a coherent vision for the pursuit of prosperity’¹⁶.
25. The Integrated Strategy describes this target as ‘highly ambitious’¹⁷. In framing this view, it is helpful to consider that the target would be comfortably achieved and exceeded, if the historic level of job growth achieved in the borough over the past five years is sustained. Indeed, the continued creation of 554 jobs per annum would generate circa 8,300 jobs over fifteen years; around 10% more than the target in the Integrated Strategy. Whilst this is presented for

¹⁵ NISRA (2012-17) Northern Ireland Business Register and Employment Survey. This analysis was completed prior to the release of 2018 statistics on 27 June 2019

¹⁶ Ards and North Down Borough Council, Integrated Strategy for Tourism, Regeneration and Economic Development (2018-30)

¹⁷ *Ibid*, p47

illustrative purposes only, and is not suggested to provide an alternative forecast, it is clear that the evidence of past job growth would not suggest that the Council is being unduly ambitious in the target it has set itself.

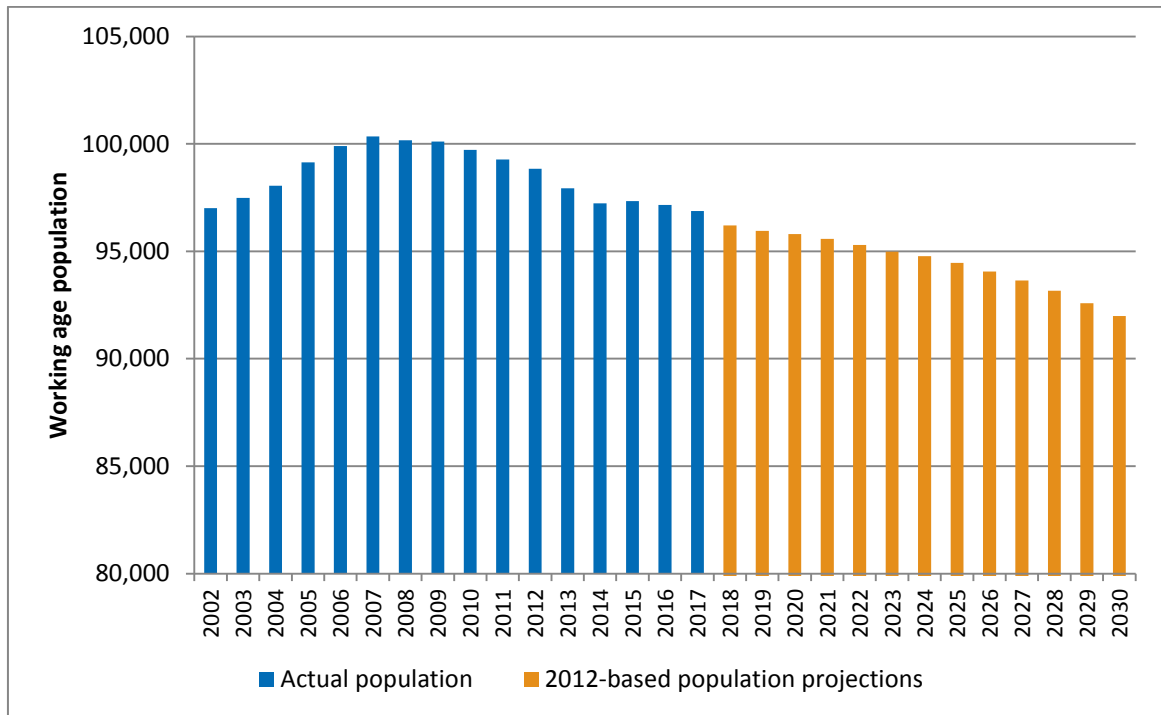
26. Notwithstanding, the Integrated Strategy describes how:

“Achievement of the strategy’s job creation target will require a reorientation of the local business base to increase the number of businesses that are active within medium and high growth sectors. This reorientation will need to be supported by targeted interventions to achieve significant increases in business starts and survival, enhanced levels of business growth and the attraction of inward investment within these sectors”¹⁸

27. It separately recognises that the local labour market must have the skills required by businesses within these high value-added sectors¹⁹. Retaining and attracting such skilled residents will therefore be essential, with the planning system recognised as playing a key role in this regard²⁰.

28. Within this context, it is of concern that Ards and North Down has been unable to sustain its working age population (16 – 64) over recent years, with a particularly marked decline over the past decade. Importantly, the HGI is derived from an assumption, within the 2012-based population projections, that the working age population of the borough will continue to decline over the plan period, as shown in the following chart.

Figure 4: Working Age Population in Ards and North Down, 2001-2030



Source: NISRA

¹⁸ *Ibid*, p47

¹⁹ *Ibid*, p48

²⁰ *Ibid*, p30

29. Simply providing the homes needed to accommodate growth implied by the 2012-based population projections, through the HGI, would therefore not be expected to grow the working age population of Ards and North Down. This would potentially threaten the realisation of the Council's economic job growth target, conflicting with the Council's stated intention to '*facilitate such jobs growth*' through '*supportive policies*'²¹.
30. On the basis of the points raised above, it is considered that the important relationship between housing need and employment growth is not sufficiently explored within the POP or its underlying evidence base. The Council should look to consider in more detail how its labour force could change if housing provision were constrained to the level implied by the HGI, and separately seek to establish the level of population growth that would likely ensure the provision of an adequate labour force over the plan period to support its ambition to create 7,500 jobs. Implications for the establishment of an appropriate housing requirement would then need to be considered by the Council in the context of other drivers of need.

Addressing severe affordability pressures

31. As set out above, a need and demand for housing will be generated in Ards and North Down both by projected household formation and future economic growth. This demand must be balanced against supply to avert an imbalance, which would be likely to manifest itself in rising house prices and rents. This would in turn worsen housing affordability, and have a particularly marked impact on the ability of younger people to enter and exercise reasonable choice within the housing market. The existence of this issue in Ards and North Down has already been acknowledged within the POP²².
32. The Council has identified that the borough is already characterised by high house prices, with average prices the second highest in Northern Ireland behind only Lisburn and Castlereagh²³. This is a strong indicator that the supply of housing in the borough has historically fallen short of demand.
33. The HGI of 546 dwellings per annum would represent a continuation of the historic rate of provision, with the POP indicating that delivery has averaged 530 – 550 homes per annum during recent periods²⁴. While these figures do not precisely align with the Department of Finance data introduced at Figure 3 of this note, the latter – which relate to net growth in the housing stock, cover the period up to 2019, and are broken down to individual years – suggest a comparable rate of growth, averaging circa 577 net additional homes per annum over the past eleven years (2008 – 2019).
34. Delivering at such a rate does not appear to have allowed the housing market to achieve a more sustainable balance between supply and demand, based on the evidenced worsening of the affordability situation in Ards and North Down. As such, there is no evidence to suggest that a continuation at this rate would address one of the key challenges identified in the POP. In the context of Figure 3, the HGI would arguably represent a regressive step, limiting a continuation of

²¹ Ards and North Down Borough Council (March 2019) Local Development Plan Preferred Options Paper, p62

²² *Ibid*, p10

²³ Ards and North Down Borough Council (2019) Local Development Plan – Position Paper: Population Growth and Housing, paragraph 3.16

²⁴ Ards and North Down Borough Council (March 2019) Local Development Plan Preferred Options Paper, p58. Average between 2008 and 2012 is calculated as 532 dwellings per annum, increasing to 547 dwellings per annum between 2013 and 2017

the higher rate of growth that has been achieved in the past three years. The scale of growth in the housing stock has exceeded the HGI in each of these years, by as much as 105% in 2018/19. Achieving such an increase indicates that there is a healthy level of demand which exists in the local market.

35. Planning for an increase in historic housing delivery would also serve to facilitate the provision of affordable housing, beyond that which could be delivered through the HGI. The POP recognises that the need for affordable housing is '*a major issue*' in Ards and North Down²⁵, with the Northern Ireland Housing Executive (NIHE) recording 3,060 households within the borough that are in need of social housing. Around two thirds, or over 2,000 households, are in housing stress²⁶. NIHE estimates that 706 social units are needed in Ards and North Down over the next five years, equivalent to circa 140 per annum.
36. The POP proposes a strategy that would aim to meet this need through a combination of different approaches, including by securing a proportion of affordable housing in new developments²⁷. It suggests, for example, that a 20% proportion could be required for developments of over 50 units. Where this proportion was achieved, it would indicatively suggest that the delivery of over 700 homes each year could be required to meet an annual need for 140 social units, albeit this could be an underestimate when recognising that much of the housing land supply is committed without providing affordable housing. This would exceed delivery which could be achieved through the proposed housing requirement, thereby again creating a potential risk that the POP would fail to address an issue that the Council has identified as significant to ensure the sustainable future of its residents and communities.

Conclusions and Recommendations

37. This technical review indicates that the Council has to date not provided sufficient justification or evidence to support the level of housing provision proposed within the POP, which is directly aligned with the latest HGI. This approach has also led the Council to present no alternative options on the scale of housing growth to be provided for through the LDP, which is considered to represent a further weakness.
38. The Council's claim that provision for 546 dwellings per annum will '*deliver the housing that is needed within the borough*' is considered to be unsubstantiated, because there has been no interrogation of whether the HGI accurately reflects the factors that are likely to generate a need for housing in Ards and North Down over the plan period.
39. These factors have been explored within this note, confirming that:
 - **The HGI is predicated upon an average level of annual population growth that has been exceeded in all but three of the past fifteen years.** A lower rate of population growth has only been seen in those years that followed a sharp slowdown in the rate of housing growth, appearing potentially misrepresentative within this context and therefore requiring careful consideration and explanation. There is already evidence that the population of Ards and North Down is growing to a significantly greater extent than

²⁵ *Ibid*, p87

²⁶ NIHE (2018) Ards & North Down Housing Investment Plan Annual Update, p16

²⁷ Ards and North Down Borough Council (March 2019) Local Development Plan Preferred Options Paper, p87

assumed within the HGI, with this trend likely to continue given that housing growth has accelerated over the past two years (2017/18; 2018/19) for which the population is yet to have been officially estimated at the time of writing. As a consequence, the HGI risks underestimating future population growth in the borough, and failing to provide the housing needed to accommodate this demographic growth;

- **Housing provision of the scale suggested by the HGI creates a risk that the Council’s ambition to create 7,500 jobs by 2030 will be undermined.** It is noted that this job growth target appears reasonable and achievable in the context of strong job growth within Ards and North Down over recent years. It is, however, likely to require the attraction and retention of skilled labour within the borough. In contrast, consideration of the changing age profile of the population inherent within the demographic projections, which underpin the HGI, suggests that the working age population of the borough will continue to diminish. The absence of sufficient consideration of the important relationship between housing need and employment growth therefore runs the risk that the housing requirement will not facilitate a growth in the labour force that will be sufficient to support the Council’s job growth ambitions; and
- **The HGI will not increase the historic rate of housing supply in the borough,** at best sustaining delivery at a level that has over recent years contributed towards sustaining and indeed increasing evidence of market stress. The HGI would arguably represent a regressive step in this regard, by limiting a continuation of the improving trend that last year saw housing growth peak at a level more than double the HGI in response to strong market demand. It would also forego an opportunity to secure additional affordable housing, in response to a significant acknowledged need that exists within the borough.

40. It is vital that the Council considers the above factors in devising a planning strategy that can be judged as sound. A failure to do so would impact upon the development of sustainable communities and limit households’ ability to access the local housing market.

41. On this basis, it is strongly advised that the Council comprehensively reviews, updates and expands the evidence base on which it relies to justify its proposed level of housing provision. This should incorporate:

- **A process of sensitivity testing to determine whether the population growth that underpins the HGIs is sufficiently representative of prevailing demographic trends in Ards and North Down.** While HGIs should be considered as part of the process in setting an appropriate housing requirement, they are explicitly not *‘a cap on housing development...or a target to be achieved’*²⁸. They are intended to be used for guidance only and therefore should not be viewed uncritically. They rely on trend-based projections which are strongly influenced by the specific local factors that have influenced growth during their trend periods, including housing delivery and the wider economy. Sensitivity testing based on long-term demographic trends in the borough would, for example, more effectively capture the stronger period of growth seen prior to the onset of the recession. This should also aim to incorporate the latest available population estimates, albeit remaining mindful that – at the time of writing – they are yet to reflect the impact of strong housing growth in the past two years;

²⁸ Department for Infrastructure (2016) 2012 based Housing Growth Indicators and methodology paper, p1

- **An assessment of the housing growth that will be needed to grow the labour force and support ambitions for job growth in Ards and North Down.** The Council should look to explore how its labour force would change if housing provision were constrained to the level implied by the HGI, taking account of the changing population profile and the likely participation of different age cohorts within the economy. This would evidence whether the labour needed to support this growth is likely to be available and/or whether a departure from historic trends would be necessary. The LDP provides the Council with an opportunity to proactively address any prospective shortfall, by planning for the housing required to attract and retain skilled residents, grow its labour force and support economic ambitions; and
- **A consideration of whether planned housing provision will effectively meet the need for affordable housing, and improve existing affordability pressures that have been caused, at least in part, by historic imbalance between supply and demand.** This will ensure that the LDP appropriately responds to the significant need for social housing, and will not lead to a further worsening in the affordability of the private housing market.

Appendix 4: Analysis of Housing Land Supply

Review of Housing Land Supply Information

Ards & North Down POP

1. An analysis of Council housing monitor data has been undertaken to test the effectiveness of the housing land supply in Bangor.
2. The approach was to compare information available on monitored sites contained in the two datasets of 1 August 2013 and 1 August 2018.

Table 1: Headline Comparison of 2013 and 2018 Housing Monitors

Monitor	Units Complete	Remaining Potential	Area Developed (ha)	Area Remaining (ha)
2013	7986	4004	338.26	111.79
2018	8556	3176	357.05	85.12
Change 13-18	+ 570	- 828	+ 18.79	- 26.67

Source: Northern Ireland Land Use Database tables for Bangor, 1 August 2013 and 1 August 2018, provided by Ards and North Down Borough Council.

3. A comparison of the headline information shows that there is land for over 3,000 units remaining. Considering the Monitor information on the number of houses built in the five year period from 2013 to 2018, this would suggest the availability of an adequate and continuous supply of land which could serve the town well into the new Plan period.
4. When reviewed on a site by site basis, however, the data shows that a very significant number of the monitored sites have not delivered any houses in the period between the two housing monitors.

Table 2: Table 2: Non-Contributing Sites 2013-2018

Site Reference	Units Complete	Remaining Potential
Various	1483	2499
With Rathgael adjustment ¹	1483	2249

Source: Northern Ireland Land Use Database tables for Bangor, 1 August 2013 and 1 August 2018, provided by Ards and North Down Borough Council.

¹ Site Ref 17149 Rathgael Rd/School Ave is identified as having a remaining potential of 690. Whilst planning permission was granted for this number of units, an alternative planning permission with a lower number of units (350) is presently being implemented. There are also other issues with sites having been double counted, permissions having lapsed or sites having been developed/approved for other uses, so a more detailed review is likely to reduce the stated potential of deliverable housing.

5. When the non-contributing sites are taken away from the headline figures, the results are as follows:

Table 3: Adjusted Housing Land Supply

Site Reference	Remaining Potential
2018 Monitor Remaining Potential	3176
Non contributing sites	2249
	927

6. Applying the Housing Monitor 2013 to 2018 build rate ($570/5 = 114$ units per year), this adjusted supply figure equates to an 8 year supply – sufficient to take the town to 2026. There is also evidence (LPS/DoF) to suggest that the Borough build rate has increased significantly in the last few years.
7. This would suggest that the deliverable housing land supply will run out well before the stated end date of the plan, leaving a significant gap in housing land supply.

Appendix 5: Analysis of NISRA Information

Analysis of NISRA Information

Ards & North Down POP

Bangor – One of NI’s Largest Towns

1. Bangor is one of the largest towns in Northern Ireland. The Northern Ireland Statistics & Research Agency (NISRA) Review of the Statistical Classification and Delineation of Settlements Report (March 2015) identified Bangor as the third largest Band C (Large Town) settlement in Northern Ireland by population. Aside from Belfast (Band A) and Londonderry (Band B), this means that Bangor is the fifth largest settlement in Northern Ireland. With a 2011 Census population of 61,401 Bangor is more than twice as large as Ards & North Down’s other Band C settlement - Newtownards (population 28,039). The town clearly has a scale and critical mass at the upper end of Northern Ireland’s settlements.

Table 3: List of Settlements with their 2011 and 2001 Census Day population estimates with change in population shown as change in fixed area and/or change due to Settlement Development Limit revision

Classification	Settlement Development Limit (SDL)	2011 Census population (C)	2001 Census population (A)	% Population change	Population change within SDL (D)	Population change SDL revision (E)
BAND A - BELFAST	BELFAST CITY	280,211	276,705	1.3%	3,569	-63
BAND B - DERRY CITY	DERRY CITY	83,125	83,652	-0.6%	-527	0
BAND C - LARGE TOWN (POPULATION 18,000+)	METROPOLITAN NEWTOWNABBEY	65,555	62,022	5.7%	1,094	2,439
	CRAIGAVON URBAN AREA including AGHACOMMON	64,193	57,651	11.3%	7,474	-932
	BANGOR	61,401	58,368	5.2%	2,942	91
	METROPOLITAN CASTLEREAGH	55,783	54,636	2.1%	-186	1,333
	LISBURN CITY †	45,410	-	-	-	-
	METROPOLITAN LISBURN †	31,203	-	-	-	-
	BALLYMENA	29,467	28,704	2.7%	702	61
	NEWTOWNARDS	28,039	27,795	0.9%	111	133
	CARRICKFERGUS	27,903	27,192	2.6%	711	0
	NEWRY	26,893	27,300	-1.5%	2,080	-2,487
	COLERAINE	24,630	24,042	2.4%	1,089	-501
	ANTRIM	23,353	19,986	16.8%	3,367	0
	OMAGH TOWN	19,682	19,836	-0.8%	-154	0
	LARNE	18,705	18,210	2.7%	495	0
Band C Total	14	522,217	425,742	22.7%	-	-

Review of the Statistical Classification and Delineation of Settlements Report (March 2015)

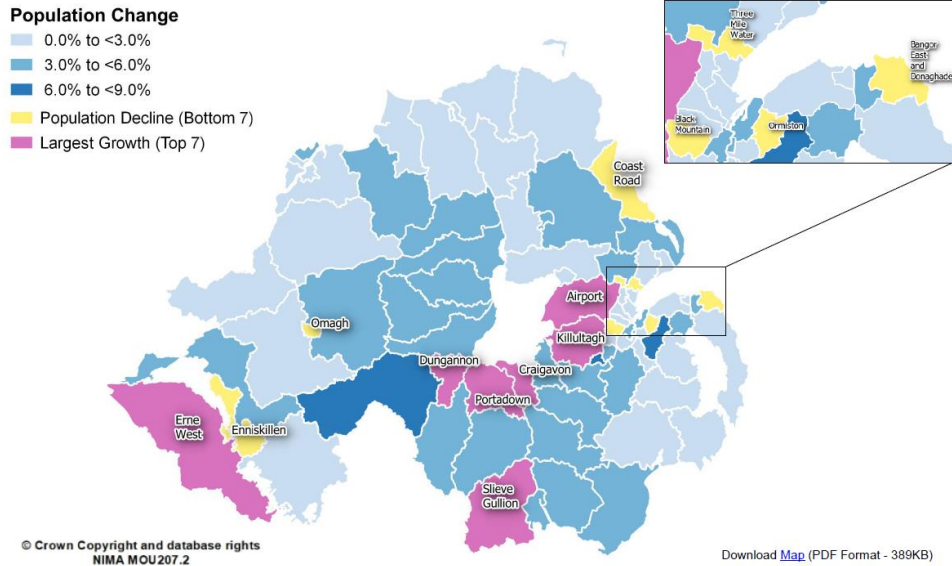
2. There are three other aspects of the town’s population which are interesting from a planning perspective:
 - It is not growing particularly fast, indeed there are DEA’s experiencing population loss;
 - It is home to a large older population, which is projected to continue to grow;
 - Average household size is projected to be the lowest in NI.

Population Growth

3. Inter-censal (2001-2011) population growth was 5.2%. NISRA has recently published statistics in respect of population growth from 2011 to 2017 at District Electoral Area (DEA) level. The commentary provided by NISRA focuses on those areas with the greatest growth and decline. NISRA reports that nearly all of the 80 DEAs in Northern Ireland experienced population growth

between mid-2011 and mid-2017, with only 7 experiencing decline. One of the 7 DEAs which has experienced population decline is Bangor East & Donaghadee, where NISRA reports a decline of 300 people. Only two other DEAs in Northern Ireland experienced a larger level of population decline.

Map 4: District Electoral Areas by percentage population change (mid-2011 to mid-2017)

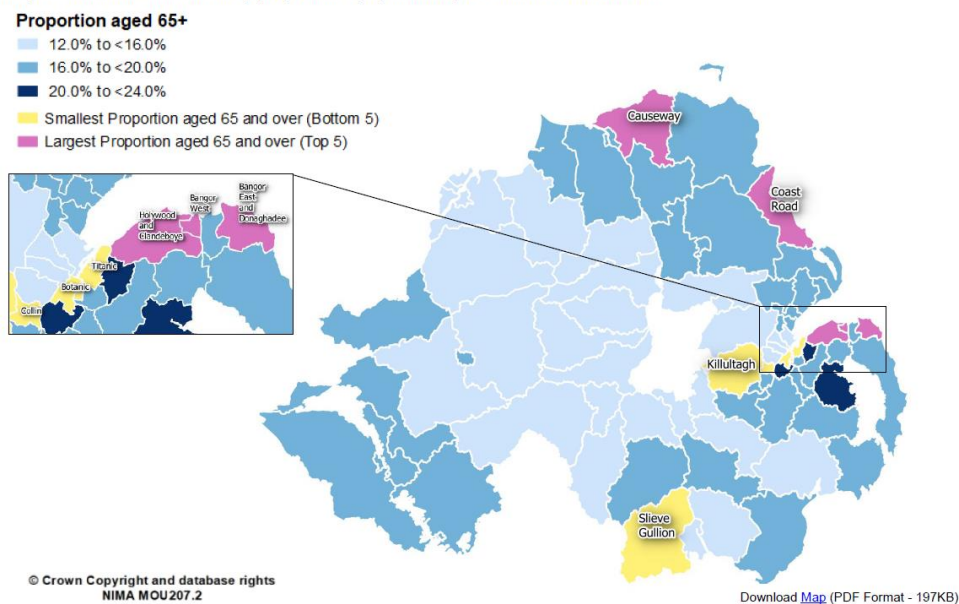


NISRA Statistical Bulletin | 2017 Mid-year Population Estimates for District Electoral Areas | 21 February 2019 (9.30am)

Older Population

- NISRA reporting shows that Bangor has 3 of the Top 5 DEA's with the largest proportion of people aged 65 and over, including the DEA with the largest proportion - Bangor East and Donaghadee at 23.9 per cent. The other two Bangor DEAs are Bangor West and Holywood and Clondeboy.

Map 2: District Electoral Areas by proportion of population aged 65 and over in mid-2017

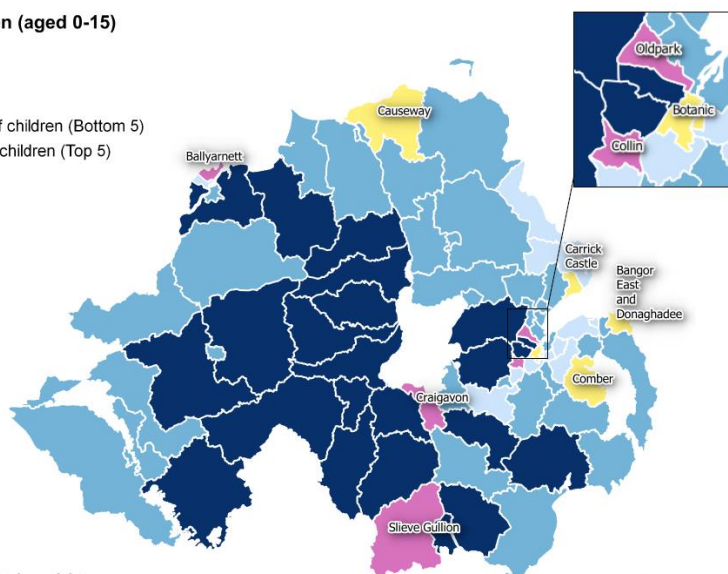


5. The corollary of this is that Bangor East and Donaghadee is the Northern Ireland DEA with the third lowest proportion of children (aged 0-15 years).

Map 3: District Electoral Areas by proportion of children in mid-2017

Proportion of Children (aged 0-15)

- 16.0% to <19.0%
- 19.0% to <22.0%
- 22.0%+
- Smallest Proportion of children (Bottom 5)
- Largest Proportion of children (Top 5)



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NIMA MOU207.2

Download [Map](#) (PDF Format - 408KB)

LDG Lowest Mean Household Size in NI

6. NISRA has recently published statistics in respect of household projections (2016 based) for Northern Ireland to 2025 and 2041. Information is available at Local Government District (LGD) level. NISRA report that while each of the LGDs in Northern Ireland is projected to have a growing number of households between 2016 and 2041, the rates of growth vary throughout Northern Ireland.

Table 5: Projected Household change for Local Government Districts in Northern Ireland, 2016 to 2041

Area	Projected Households						Projected Household Change			
	2016		2026		2041		2016-2026		2016-2041	
	Number	% of NI	Number	% of NI	Number	% of NI	Number	%	Number	%
Antrim & Newtownabbey	55,200	7.6	58,200	7.6	60,900	7.5	3,100	5.5	5,700	10.4
Ards & North Down	65,900	9.1	69,300	9.0	70,500	8.7	3,400	5.1	4,600	7.0
Armagh City, Banbridge & Craigavon	79,200	10.9	87,300	11.4	97,600	12	8,100	10.2	18,400	23.2
Belfast	143,500	19.8	146,400	19.0	152,100	18.7	2,900	2.0	8,600	6.0
Causeway Coast & Glens	55,200	7.6	57,600	7.5	58,800	7.2	2,400	4.4	3,600	6.5
Derry City & Strabane	57,500	7.9	59,400	7.7	60,200	7.4	1,900	3.2	2,700	4.6
Fermanagh & Omagh	42,900	5.9	45,400	5.9	47,400	5.8	2,500	5.9	4,500	10.5
Lisburn & Castlereagh	55,300	7.6	61,300	8.0	68,500	8.4	6,000	10.8	13,200	23.9
Mid & East Antrim	55,600	7.7	58,400	7.6	60,100	7.4	2,700	4.9	4,500	8.0
Mid Ulster	50,100	6.9	55,100	7.2	61,200	7.5	5,000	9.9	11,100	22.0
Newry, Mourne & Down	64,600	8.9	70,100	9.1	76,500	9.4	5,500	8.5	11,800	18.3
NORTHERN IRELAND	725,100	100.0	768,500	100.0	813,800	100.0	43,300	6.0	88,700	12.2

7. From an Ards & North Down perspective it is important to note that the projected increase in household change is being driven by an increase in the number of 1 and 2 adult households with no children.

Table 6: Percentage change in households by household type and Local Government District, 2016-2041

Local Government District	Percentage Change 2016 - 2041					
	Without Children			With Children		Total
	1 Adult	2 Adult	Other	1 Adult	Other	
Antrim & Newtownabbey	24.6	21.1	8.8	-11.0	-11.4	10.4
Ards & North Down	13.2	20.9	0.0	-13.1	-13.5	7.0
Armagh City, Banbridge & Craigavon	21.8	45.0	25.2	5.7	5.3	23.2
Belfast	7.2	14.0	7.5	-3.5	-3.9	6.0
Causeway, Coast & Glens	22.1	21.0	-1.4	-18.1	-18.3	6.5
Derry City & Strabane	21.6	16.4	-4.8	-14.4	-14.6	4.6
Fermanagh & Omagh	19.6	33.4	1.1	-11.8	-12.2	10.5
Lisburn & Castlereagh	31.7	37.8	21.4	3.7	3.2	23.9
Mid & East Antrim	17.0	18.4	5.0	-10.3	-10.7	8.0
Mid Ulster	28.4	45.4	23.5	1.3	0.8	22.0
Newry, Mourne & Down	25.7	39.9	13.9	-1.1	-1.5	18.3
NORTHERN IRELAND	18.6	27.0	9.6	-5.9	-5.9	12.2

NISRA Statistical Bulletin | Northern Ireland Household Projections (2016-based) | 6 December 2018 (9.30am)

8. NISRA report that from 2016 to 2041, the average household size is projected to decrease in each Local Government District. From 2026 onwards, Belfast is projected to be no longer the District with the lowest average household size, relinquishing this title to Ards and North Down.

Ards & North Down Local Government District

	Projections			Projected Change			
	2016	2026	2041	2016-2026		2016-2041	
				Number	%	Number	%
Population by age							
0-15	30,000	28,600	25,900	-1,300	-4.5	-4,000	-13.5
16-64	97,200	94,600	87,100	-2,600	-2.7	-10,100	-10.4
65 and over	32,500	40,300	49,900	7,900	24.2	17,500	53.8
Total Population	159,600	163,500	162,900	3,900	2.5	3,300	2.1
Households by household type							
One adult without children	18,300	20,000	20,700	1,800	9.8	2,400	13.2
Two adults without children	21,600	23,900	26,200	2,300	10.5	4,500	20.9
Other households without children	8,700	8,800	8,700	100	1.1	0	0.0
One adult with children	3,200	3,100	2,800	-100	-4.6	-400	-13.1
Other households with children	14,100	13,500	12,200	-700	-4.7	-1,900	-13.5
All Households	65,900	69,300	70,500	3,400	5.1	4,600	7.0
Households by household size							
1 person	18,300	20,000	20,700	1,800	9.8	2,400	13.2
2 person	23,400	25,600	27,700	2,200	9.4	4,300	18.3
3 person	10,500	10,300	9,800	-200	-2.0	-700	-7.1
4 person	9,200	8,900	8,300	-300	-2.9	-900	-9.4
5+ person	4,500	4,400	4,100	-100	-3.1	-500	-10.6
Average household size	2.39	2.33	2.27	-0.06	-2.6	-0.12	-5.0

NISRA Statistical Bulletin | Northern Ireland Household Projections (2016-based) | 6 December 2018 (9.30am)

9. The principal driver for this is the projected 24% increase in the population 65 and over.

Appendix 6: Analysis of Sustainability Appraisal

Sustainability Appraisal and Strategic Environmental Assessment

A review of the Interim Sustainability Appraisal supporting the Ards and North Down Borough Local Development Plan 2030

- 1.1 In March 2019, Ards and North Down Borough Council (ANDBC) published the Local Development Plan (LDP) 2030 – Preferred Options Paper (POP) and supporting Interim Sustainability Appraisal (SA) which incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive, hereafter referred to as the ‘Interim SA’.
- 1.2 However, an omission from the online version of the POP was identified with implications in respect of compliance with relevant Regulations for consultation. In order to ensure the Council fully complies with the legal requirements of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the consultation period was restarted for 12 weeks from Friday 17 May 2019.
- 1.3 A review of the Interim SA document produced in support of the POP has been undertaken in relation to the Spatial Growth Strategy and particularly for the proposed allocation of housing within the Borough.
- 1.4 The documents that have been reviewed or informed comments at this stage of the LPD process are:
 - Local Development Plan - Preferred Options Paper, March 2019;
 - Ards and North Down Borough Council Local Development Plan. Interim Sustainability Appraisal Report incorporating Strategic Environmental Assessment, March 2019;
 - Housing Allocation - Local Development Plan Position Paper, 2018; and
 - Regional Development Strategy (RDS) 2035, Department for Regional Development, 2010.
- 1.5 For Northern Ireland, the relevant guidance with respect to SA and SEA is:
 - Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the ‘EAPP Regulations’); and
 - Development Plan Practice Note 4. Sustainability Appraisal incorporating Strategic Environmental Assessment. April 2015 (hereafter referred to as the ‘DP Practice Note’).
- 1.6 Paragraph 3.1 of the DP Practice Note on SA/SEA states that:

“The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans and programmes such as local development plans.”

- 1.7 A review of the SA documents listed above against the EAPP Regulations and the DP Practice note has been undertaken to identify any areas of:
- Procedural or technical non-compliance with the EAPP Regulations; and/or
 - Procedural or technical non-compliance with the guidance within the DP Practice Note on SA/ SEA.
- 1.8 A number of concerns have been identified by this review regarding the process and content of the Interim SA, as summarised below:
- i. Failure of the Interim SA to provide the reasons for selecting the alternatives dealt with and outline any rejected alternatives across the spatial growth issues to ensure the proposed strategy directs development to the most sustainable locations;
 - ii. Failure to develop the evidence base to allow the settlement hierarchy to inform the housing allocation options within the POP; and
 - iii. Inadequate non-technical summary which does not cover the information required by the EAPP Regulations (although this may potentially be addressed by the final Environmental Report).
- 1.9 The following sections discuss these concerns in greater detail.

Assessment of Reasonable Alternatives

- 1.10 The proposed strategy for Spatial Growth should direct development to the most sustainable locations in the Borough and, in accordance with the EAPP Regulations, the SA process should include the identification, description and evaluation of reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.
- 1.11 As stated in Section 3.1 of the Interim SA, “*up to three Options were identified for each Issue*” including those grouped under the Spatial Growth Strategy heading. For each issue, options identified have been appraised for their likely significant effects against the 14 objectives of the SA Framework as outlined at Scoping stage.
- 1.12 Schedule 2 of the EAPP Regulations is incorporated within Appendix 1 of the Interim SA as a compliance checklist for SEA which identifies each of the Environmental Report requirements of Schedule 2 and the location within the Interim SA or Scoping report as necessary.
- 1.13 In relation to requirement 8 of EAPP Regulations, the Environmental Report must include “*an outline of the reasons for selecting the alternatives dealt with*”. Appendix 1 of the Interim SA states this requirement is covered within Chapter 2 of the SA Interim report in general and that Chapter 3 and Appendix 4 of the Interim SA provide further detail on the options appraised and the assumptions and limitations encountered.
- 1.14 However, upon review of Chapter 2, the only justification provided for the reasonable alternatives dealt with is that these are “*the different options put forward during the preparation of the [Preferred Options] paper*” with no further outline of how these options were selected or whether any additional alternatives were rejected and not appraised by the

Council. This approach fails to meet the requirements of the EAPP Regulations and the SA/SEA reporting is therefore considered unsound.

- 1.15 The Interim SAP also states that in a few cases there was no feasible alternative and as a result only a single option was put forward. Whilst none of the single option proposals (Issues 10, 13, 23, 41 and 42) directly affect the spatial growth strategy, a 'no policy' option should be considered in these instances in order to provide sound justification for each preferred option to be taken forward i.e. the positive effects upon the SA objectives of the LDP.

Spatial Growth Strategy – Housing Allocations

- 1.16 A more detailed review of the Housing Allocation options and the preferred option forming part of the Spatial Growth Strategy has been undertaken.
- 1.17 The RDS acknowledges housing to be a key driver of physical, economic and social change, emphasising the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure in RG 8 "*Manage housing growth to achieve sustainable patterns of residential development*" to ensure the varied housing needs of the whole community are met.
- 1.18 The Interim SA reviews the following options in relation to Housing Allocation:
- (A) Maintain existing housing growth through retention of housing zonings within extant plans;
 - (B) Re-evaluate existing housing zonings and allocate additional housing land, if required, to ensure continued modest housing growth (using sequential approach); and
 - (C) Allocate housing land proportionally across settlements based on population (Census 2011).
- 1.19 Public and stakeholder participation is a crucial part of the preparation of the POP, particularly in identifying relevant local issues and in the development of the evidence base in accordance with DP Practice Note guidance. At the POP stage, the information and evidence base prepared for the generation of options and alternatives will also fulfil part of the requirements of EAPP Regulations.
- 1.20 It is our view that work to update the Settlement Hierarchy (as covered by Key Issue 2 within the POP) should have already been undertaken at this stage to allow stakeholders to comment as part of the POP process and to help inform the allocation of housing at site level and direct new housing towards the most sustainable settlements in line with the aim of the LDP Spatial Growth Strategy.
- 1.21 We therefore do not consider Option C to be a reasonable alternative as it does not align with paragraph 10.4 of the Housing Allocation Position Paper which states that future housing growth within the Borough is "*required to reflect the guidance contained in the RDS and will also be dependent on the Council's Settlement Hierarchy.*"
- 1.22 Had work been undertaken at this stage in line with the preferred Settlement Hierarchy option, Option C could have been progressed to allocate housing land proportionally across settlements based on the updated settlement hierarchy evidence base to ensure a deliverable

five year supply of land for housing is maintained. It is our view that this would then present the 'most sustainable' option for the Borough in terms of housing allocation.

- 1.23 However, the Councils preferred approach aligns with Option B to re-evaluate existing zonings and allocate additional housing land (if required) for continued modest housing growth. There is however no justification provided in relation to the 'modest' growth and no alternative growth scenarios are considered as part of the options for the spatial growth strategy.
- 1.24 In this respect, the SA process is inherently flawed and deprives stakeholders the opportunity to engage in a meaningful consultation process with regards the level and location of new housing.

The non-technical summary is inadequate in its coverage of the information required by the EAPP Regulations

- 1.25 At present, the non-technical summary provided at the front of the Interim SA report falls significantly short of meeting the requirement 10 of Schedule 2 within the EAPP Regulations which must include the following:
- i. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes;
 - ii. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
 - iii. The environmental characteristics of areas likely to be significantly affected;
 - iv. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(9) and the Habitats Directive;
 - v. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;
 - vi. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects;
 - vii. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;
 - viii. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; and
 - ix. A description of the measures envisaged concerning monitoring in accordance with Regulation 16.

1.26 It is expected that this omission will be rectified within the final Environmental Report to ensure legal compliance with the EAPP Regulations.

Conclusions on the Interim Sustainability Appraisal supporting Ards and North Down Borough Council Local Development Plan 2030 – Preferred Options Paper

1.27 Whilst we agree with some of the preferred options, the SA process in relation to the Spatial Growth Strategy is flawed. As presented, the Interim SA raises concerns with regards to its process and content which can be summarised as follows:

- There is a failure of the SA Process to meet the requirements of the EAPP Regulations in the development and justification of the options assessed in relation to Strategic Growth in Ards and North Down Borough;
- There is a failure to consider all reasonable alternatives for housing allocation as it relates to an up to date evidence base and proposed settlement hierarchy; and
- The non-technical summary within the Interim SA report fails to meet the information requirements of Schedule 2 within the EAPP Regulations.

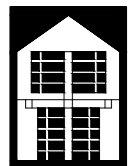
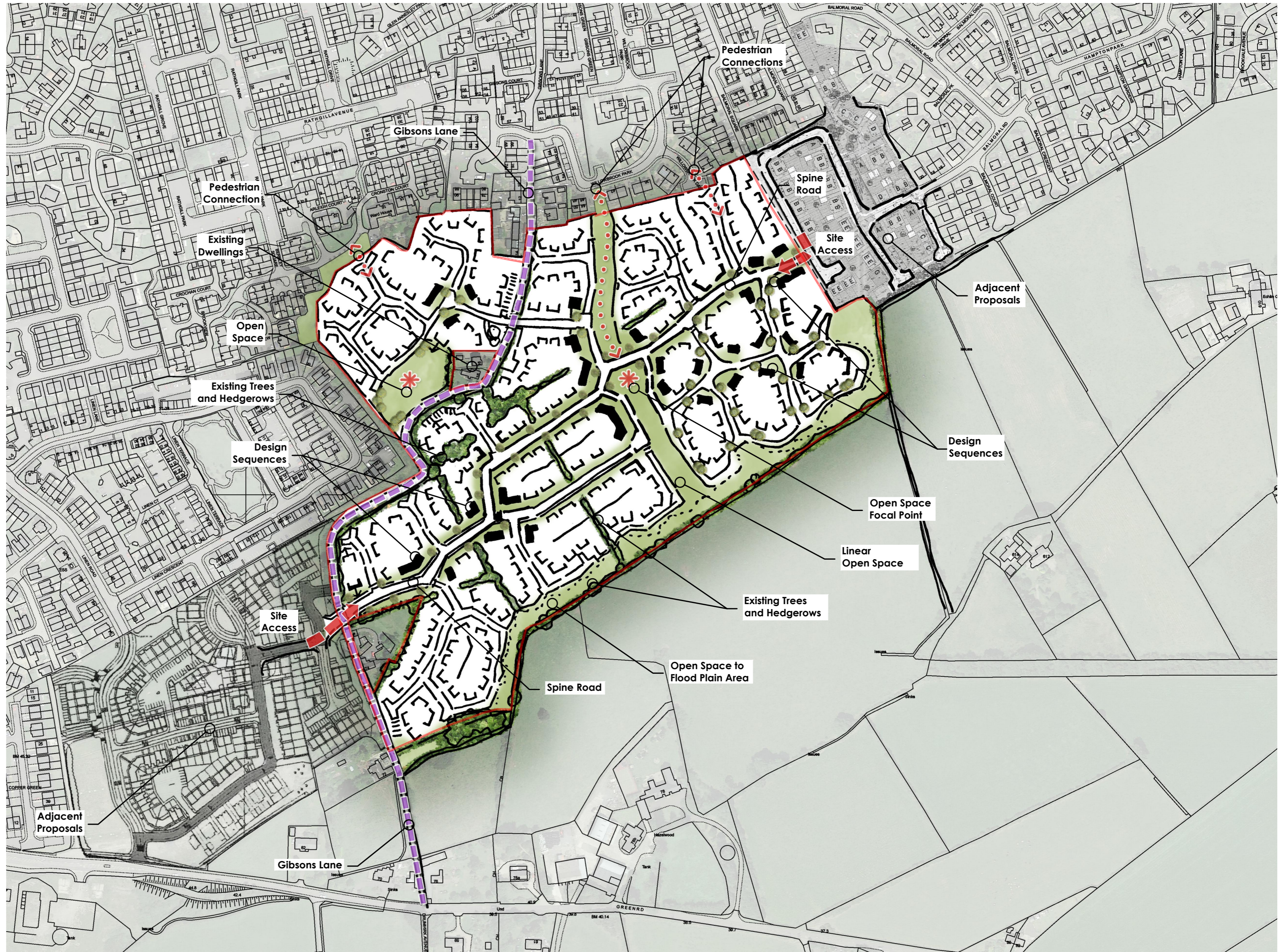
Appendix 7: Alan Patterson Masterplan

GIBSONS LANE
GREEN ROAD, BANGOR

Drawn: March 2019 | AWP
Scale: 1:2500 @ A2
Ref: F4698-050-03-02-003

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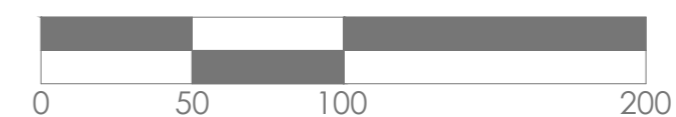


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ILLUSTRATIVE MASTERPLAN



PRELIMINARY

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GIBSONS LANE


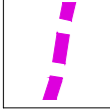
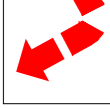
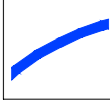
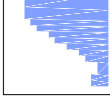

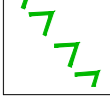

GREEN ROAD, BANGOR

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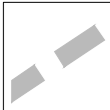


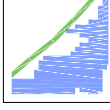
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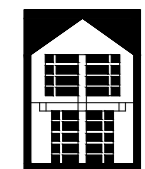
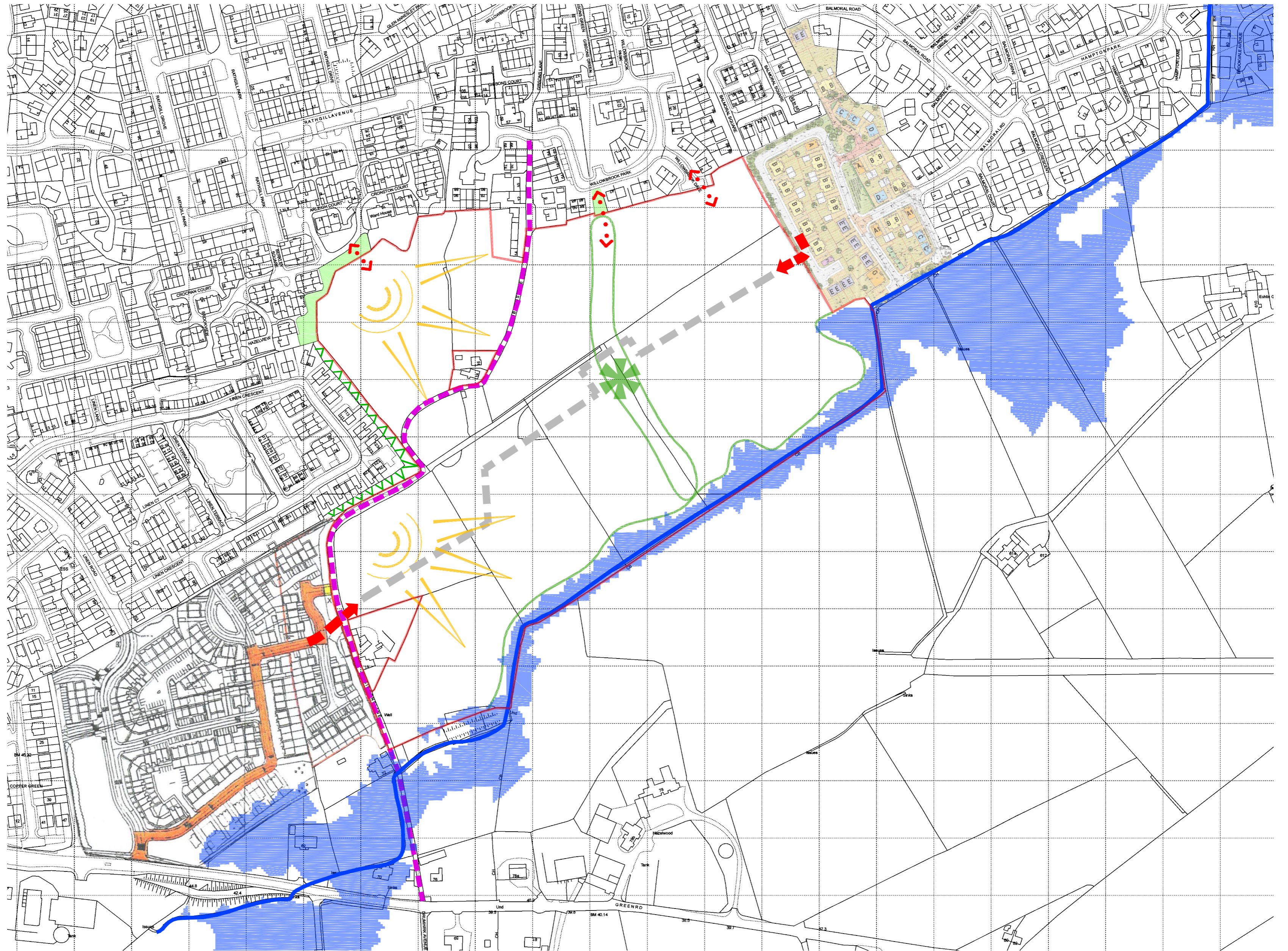
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SITE CONSTRAINTS

-  Site Boundary
-  Gibsons Lane
-  Site Accesses via Adjacent Development Proposals
-  Existing Watercourse
-  1 in 100 year Flood Extent as per Rivers Agency Map 13201SW (31st July 2018)
-  Topographic 'High points' & approximate direction of falling ground
-  Existing Embankments at boundary with Linen Crescent
-  Existing Adjacent Areas of Open Space

OPPORTUNITIES

-  Connecting Spine Road
-  Pedestrian Connections to Neighbouring Streets
-  Linear Open Space with Central Focal Point
-  Linear Open Space to Flood Plain Area

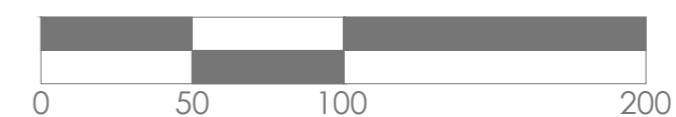


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SITE ANALYSIS



PRELIMINARY

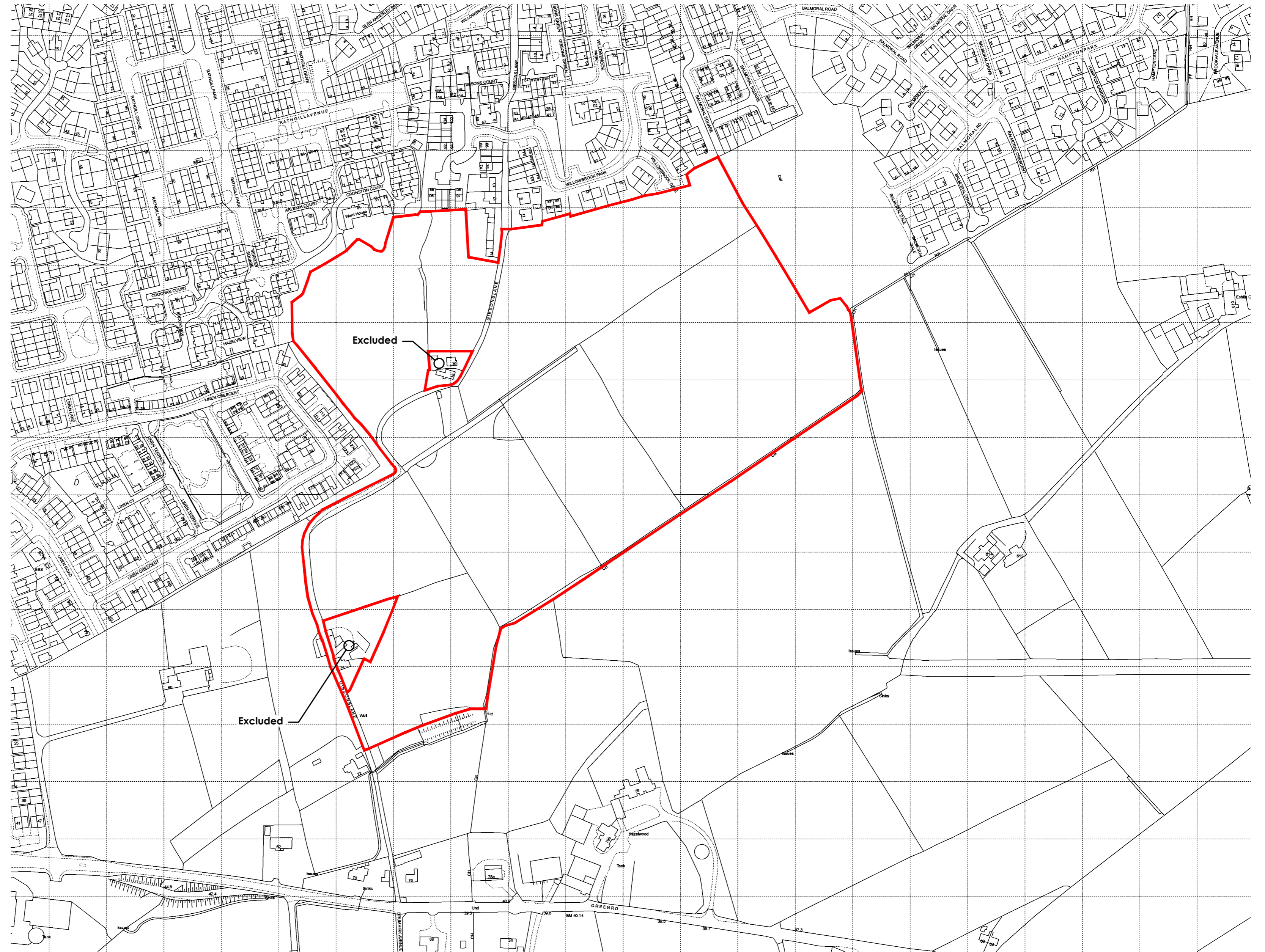
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GIBSONS LANE
GREEN ROAD, BANGOR

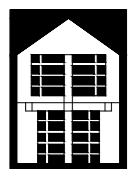
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Site Area = 13.90ha (34.34acres)

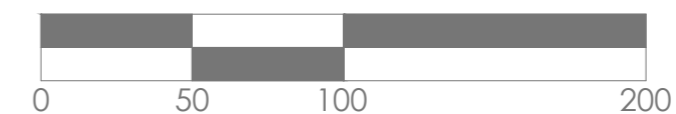


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SITE LOCATION PLAN



PRELIMINARY

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BT2 8LE

T 028 9072 3900

Turley

Appendix 2: Housing Completions Analysis

Appendix 2: Housing Completion Analysis

Issue with Evidence Base

1. In terms of housing construction since the commencement of the plan period in 2017, the Council appears to be in some difficulty with its evidence base. Footnote 39 of Table 17 in Technical Supplement 2 notes that 2,959 dwellings were completed between the beginning of the plan period in April 2017 and the end of the monitoring period in March 2022. No source is given for this number. It goes on to note that *'the nature of this data meant it was not possible to break down to an individual settlement level so it has been taken off the total of 15,608 to give a residual allocation of 12,649.'*
2. This is an unfortunate evidential gap as it does not allow for a proper comparison between the Strategic Housing Allocation (SHA) as allocated between settlements and completions, such that it is possible to gain an understanding of a residual requirement (if any) at settlement level, taking into account potential housing supply. The distribution of these 2017 to 2022 completions between the settlements in Technical Supplement 2 Table 17 is, therefore, uninformed and representative only of the Council's planned distribution, rather than the actual distribution.

How Many Houses Have Been Completed Since 2017?

3. The Council's 2,959 figure does not appear to come from the Council's various Housing Land Availability Reports.
4. The Council's first summary of housing land availability in its 2018 Report notes that between 1 August 2013 and 21 March 2018, a total of 2620 homes were constructed in settlements, at an annual average of 561 dwellings per year. There is no dataset for 2017 to 2018 or 2018 to 2019.
5. The 2019 Report appears to have aggregate figures, rather than completions per settlement for the 2018 to 2019 period and is of limited assistance. The 2020 Report notes that 616 dwellings were complete between 2018 and 2019. The 2021 Report also notes that 616 dwellings were complete 2019 to 2020 in an apparent duplication of data. The 2022 Report notes that 543 dwellings were completed between 2020 and 2021, the 2023 Report notes that 456 dwellings were completed between 2021 and 2022 and the 2024 Report notes that 557 dwellings were completed between 2022 and 2023.
6. These figures total 2,792 as set out below.

Table 1: AND Housing Land Availability Reported Completions 2017-2022

Year	Completions
2017-2018	561 (average)
2018-2019	616
2019-2020	616 (duplicate)
2020-2021	543
2021-2022	456
Total	2,792

7. This figure is close to the 2,959 figure and the difference (167) might be explained by the construction of houses in the countryside which were not included in the earlier years of the housing monitor.
8. When the Council notes that *‘the nature of this data meant it was not possible to break down to an individual settlement level’* the difficulty must be with the 2013 to 2018 dataset which, whilst providing completions at a settlement level, does not contain data for completions in the period 2017 to 2018 at settlement level (presumably the Council has non duplicate data for 2019 to 2020).
9. Unfortunately, the issue means that the Council’s Housing Monitor is not compliant with paragraph 6.140 of the SPPS:

A ‘plan, monitor and manage’ approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review. Monitoring must include: the housing land supply at the beginning and end of the annual reporting period, the number of net additional units built during the annual reporting period and the number of net additional housing units built in the period since adoption of the local policies plan. This will provide valuable information on annual building rates, housing output relative to planned densities, and will also give an indication of the validity of estimated windfall predictions. It should be noted that windfall development can occur on greenfield sites. (Emphasis added).

10. This is quoted in the most recent (2024) Housing Land Availability Report alongside such statements as the primary purpose of the Housing Land Availability Report *‘is to inform the preparation of the Councils LDP regarding the allocation of land for housing’* (para 1.2) and it *‘can provide clarity and certainty to developers.’* Unfortunately, the Council’s reporting falls short on both fronts.
11. There are several consequences of this for both the evidence base of the LDP and those wishing to make representations in response to it.
12. In an effort to address this evidential problem, we have consulted the Department of Finance Annual Housing Stock statistics, which are available at Electoral Ward, Local Government District and NISRA Super Output Area from 2008 to 2025.¹
13. At LGD level it is interesting to note that stock increased from 70,982 in 2017 to 76,464 in 2025 – a net increase of 5,482. Comparing this to the draft Plan Strategy’s new dwelling requirement of 946 dwellings per annum (para 2.48), at the time of writing, the Council is already 2,086 dwellings behind its ‘success scenario’ (8 x 946 = 7,568).
14. By reviewing the LGD Ward map², and comparing the housing stock in 2017 and 2025 it is possible to arrive at an understanding of completions in the main settlements by aggregating wards (see Appendix 5A), summarised below:

¹ [Annual housing stock statistics | Department of Finance](#)

² [dfc-ards-ndown-council-map.PDF](#)

Table 2: Net Change in Housing Stock 2017-2025

'Town'	2017 Stock	2025 Stock	Net Change
Bangor	28,437	30,134	1,697
Newtownards	14,405	15,718	1,313
Comber	4,929	5,560	631
Donaghadee	3,838	4,333	495
Holywood	5,452	5,768	316
Portaferry	1,605	1,713	108

Source: Department of Finance Annual Housing Stock statistics,

15. Whilst the wards in some cases include rural areas, the Council's housing monitor confirms that the level of annual additions to housing stock in the countryside is relatively low.
16. As a cross check, we have reviewed the Department of Finance (DoF) Housing Stock Statistics which are generated from Land & Property Service rates data. DoF housing stock data is available in the following tables:
 - housing stock by property type in the 11 district councils at April each year 2008 to 2025
 - housing stock by property type in each of the 462 electoral wards in Northern Ireland at April each year 2008 to 2025
 - housing stock by property type in each NISRA Super Output Area in Northern Ireland at April each year 2008 to 2025
17. A comparison of the total housing stock in Ards & North Down LGD in 2022 and 2017 approximates for the 1 April 2017 to 31 March 2022 monitoring period referred to in the draft Plan Strategy Technical Supplement. This shows the following:

Table 3: Ards & North Down Housing Stock 2017-2022

Date (April)	Housing Stock	Annual Increase
2017	70982	
2018	71842	860
2019	72963	1121
2020	73793	830
2021	74422	629
2022	75005	583
Change 2017 to 2022		4023
Average Annual Change		805

Source: Department of Finance (DoF) Housing Stock Statistics

18. A side by side comparison is provided below:

Table 4: Comparison of AND Housing Monitor & DoF Data: Housing Stock Net Change

	ANDBC	DoF Housing Stock
2017-2018	561 (average)	860
2018-2019	616	1121
2019-2020	616 (duplicate)	830
2020-2021	543	629
2021-2022	456	583
		4023

19. As further check, LPS publish statistics on new dwelling completions using data from Council Building Control, as set out below:

Table 5: Land & Property Services – Ards & North Down Completions

	New Dwelling Completions
2017-2018	890
2018-2019	695
2019-2020	790
2020-2021	653
2021-2022	560
Total	3588

Source: Land & Property Services

20. This data would have been provided by Ards & North Down Borough Council Building Control, which ought to have been easily accessible to the Planning Department.

21. In summary the different figures for 2017 to 2022 are as follows:

Table 6: Available Datasets for AND Completions 2017-2022

Housing Completions 1 April 2017 to 31 March 2022	
AND Plan Strategy	2,959
AND Housing Monitor	2,792
DoF Housing Stock (Rates)	4,023
DoF Housing Statistics (Building Control)	3,588

22. Even allowing for the apparent anomaly between the building control completions data and the rates data for 2018-2019, the Council's 2,959 figure looks to be low in comparison to the DoF statistics.
23. Whilst on the face of it, this analysis is not helpful for a party promoting additional development, it is important because:
 - the DoF Housing Stock (Rates) and DoF Housing Statistics (Building Control) datasets can be used to show progress towards the Council's objective of delivering an additional 15,608 dwelling units between 2017 to 2032 to support its 'success scenario'; and
 - the DoF Housing Stock (Rates) dataset can identify where the main changes in housing stock have occurred, which provides an indication of whether the Council's sustainable distribution is being achieved.

Progress to Success

24. Paragraph 2.48 of the Plan Strategy notes that the Edge Analytics modelling concludes that to achieve the '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 946 dwellings per annum.
25. Using the Council's Plan Strategy figure of 2,959 homes completed from 1 April 2017 to 31 March 2022 and adding the Council's 2024 Housing Monitor Report completion figures for the 2022 to 2023 period (557), produces a Council completions figure of 3,516 homes for the 2017 to 2023 period. This is 2,160 houses less than the total that should have been provided during this period (5,676).
26. The DoF Housing Stock (Rates) dataset suggests that 5,482 dwellings have been added to the rated housing stock in Ards and North Down from 2017 to 2025. This is 2,086 houses less than the total that should have been provided during this period (7586). Similarly, using the DoF Housing Statistics (Building Control) dataset, this suggests that 4,962 new homes have been completed during this period – 2,606 less than the total that should have been provided.
27. Obviously, applying the 10% flexibility allowance to the employment-led housing growth results in a new dwelling requirement of 1,040 dwellings during each of the 15 years of the plan period from 2017 to 2032, in which case the rate of delivery is even further behind the necessary trajectory.
28. This analysis is provided in good faith to illustrate the consequences of attempting to fill the evidential gap underpinning the draft Plan Strategy.

			2017	2025	Change		2017		2025		Council	
N08001103	BALLYGRAINEY	N090000 ARDS AND NORTH DOWN	2,411	2,792		381 Bangor						
N08001134	RATHGAEL	N090000 ARDS AND NORTH DOWN	1,566	1,939		373 Bangor						
N08001112	CLANDEBOYE	N090000 ARDS AND NORTH DOWN	1,416	1,631		215 Bangor	B					
N08001138	SILVERSTREAM	N090000 ARDS AND NORTH DOWN	1,884	2,026		142 Bangor		28,437	33.38	30,134	32.71	36
N08001123	HARBOUR	N090000 ARDS AND NORTH DOWN	2,477	2,591		114 Bangor						
N08001111	CASTLE	N090000 ARDS AND NORTH DOWN	1,930	2,038		108 Bangor						
N08001126	KILCOOLEY	N090000 ARDS AND NORTH DOWN	2,004	2,081		77 Bangor						
N08001104	BALLYHOLME	N090000 ARDS AND NORTH DOWN	1,756	1,826		70 Bangor						
N08001135	RATHMORE	N090000 ARDS AND NORTH DOWN	1,695	1,748		53 Bangor						
N08001109	BRYANSBURN	N090000 ARDS AND NORTH DOWN	1,631	1,681		50 Bangor						
N08001107	BLOOMFIELD	N090000 ARDS AND NORTH DOWN	1,882	1,929		47 Bangor						
N08001105	BALLYMAGEE	N090000 ARDS AND NORTH DOWN	1,459	1,482		23 Bangor						
N08001137	SILVERBIRCH	N090000 ARDS AND NORTH DOWN	1,566	1,573		7 Bangor						
N08001101	BALLYCROCHAN	N090000 ARDS AND NORTH DOWN	1,320	1,321		1 Bangor						
N08001108	BROADWAY	N090000 ARDS AND NORTH DOWN	1,712	1,703		-9 Bangor						
N08001122	GROOMSPORT	N090000 ARDS AND NORTH DOWN	1,728	1,773		45 Bangor & Groomsport						
			28,437	30,134		1,697						
							N					
N08001129	LOUGHRIES	N090000 ARDS AND NORTH DOWN	1,621	1,956		335 Newtownards		14,405	16.91		17.06	27
N08001131	MOVILLA	N090000 ARDS AND NORTH DOWN	1,699	1,847		148 Newtownards						
N08001116	CONWAY SQUARE	N090000 ARDS AND NORTH DOWN	2,387	2,498		111 Newtownards						
N08001117	CRONSTOWN	N090000 ARDS AND NORTH DOWN	1,642	1,703		61 Newtownards						
N08001140	WEST WINDS	N090000 ARDS AND NORTH DOWN	1,980	2,039		59 Newtownards						
N08001121	GREGSTOWN	N090000 ARDS AND NORTH DOWN	1,431	1,428		-3 Newtownards						
N08001136	SCRABO	N090000 ARDS AND NORTH DOWN	1,849	2,183		334 Newtownards						
N08001120	GLEN	N090000 ARDS AND NORTH DOWN	1,796	2,064		268 Newtownards	B+N					
			14,405	15,718		1,313		42,842	50.28	45,852	49.77	62
N08001113	COMBER NORTH	N090000 ARDS AND NORTH DOWN	1,599	1,673		74 Comber						
N08001115	COMBER WEST	N090000 ARDS AND NORTH DOWN	1,705	1,948		243 Comber						
N08001114	COMBER SOUTH	N090000 ARDS AND NORTH DOWN	1,625	1,939		314 Comber						
			4,929	5,560		631						
N08001139	WARREN	N090000 ARDS AND NORTH DOWN	1,906	2,329		423 Donaghadee						
N08001119	DONAGHADEE	N090000 ARDS AND NORTH DOWN	1,932	2,004		72 Donaghadee						
			3,838	4,333		495						
N08001125	HOLYWOOD	N090000 ARDS AND NORTH DOWN	1,889	2,013		124 Holywood						
N08001130	LOUGHVIEW	N090000 ARDS AND NORTH DOWN	2,000	2,098		98 Holywood						
N08001118	CULTRA	N090000 ARDS AND NORTH DOWN	1,563	1,657		94 Holywood						
			5,452	5,768		316						
N08001132	PORTAFERRY	N090000 ARDS AND NORTH DOWN	1,605	1,713		108 Portaferry						
			30,043	33,035		2,992		30,043	35.26	33,035	35.86	22
N08001133	PORTAVOGIE	N090000 ARDS AND NORTH DOWN	1,667	1,753		86 Portavogie						
N08001102	BALLYGOWAN	N090000 ARDS AND NORTH DOWN	1,642	1,790		148 Ballygowan						
N08001106	BALLYWALTER	N090000 ARDS AND NORTH DOWN	2,112	2,221		109 Ballywalter, Greyabbey & Ballyhatbert						
N08001110	CARROWDORE	N090000 ARDS AND NORTH DOWN	1,814	1,985		171 Carrowdore						
N08001124	HELEN'S BAY	N090000 ARDS AND NORTH DOWN	1,675	1,823		148 Helens Bay & Crawfordsburn						
N08001127	KILLINCHY	N090000 ARDS AND NORTH DOWN	1,497	1,642		145 Killinchy, Balloo & Whiterock						
N08001128	KIRCUBBIN	N090000 ARDS AND NORTH DOWN	1,909	2,024		115 Kircubbin & Cloughey						
			12,316	13,238		922		12,316	14.46	13,238	14.37	19
			85,201	92,125		6,924						

Appendix 3: Housing Land Supply Analysis

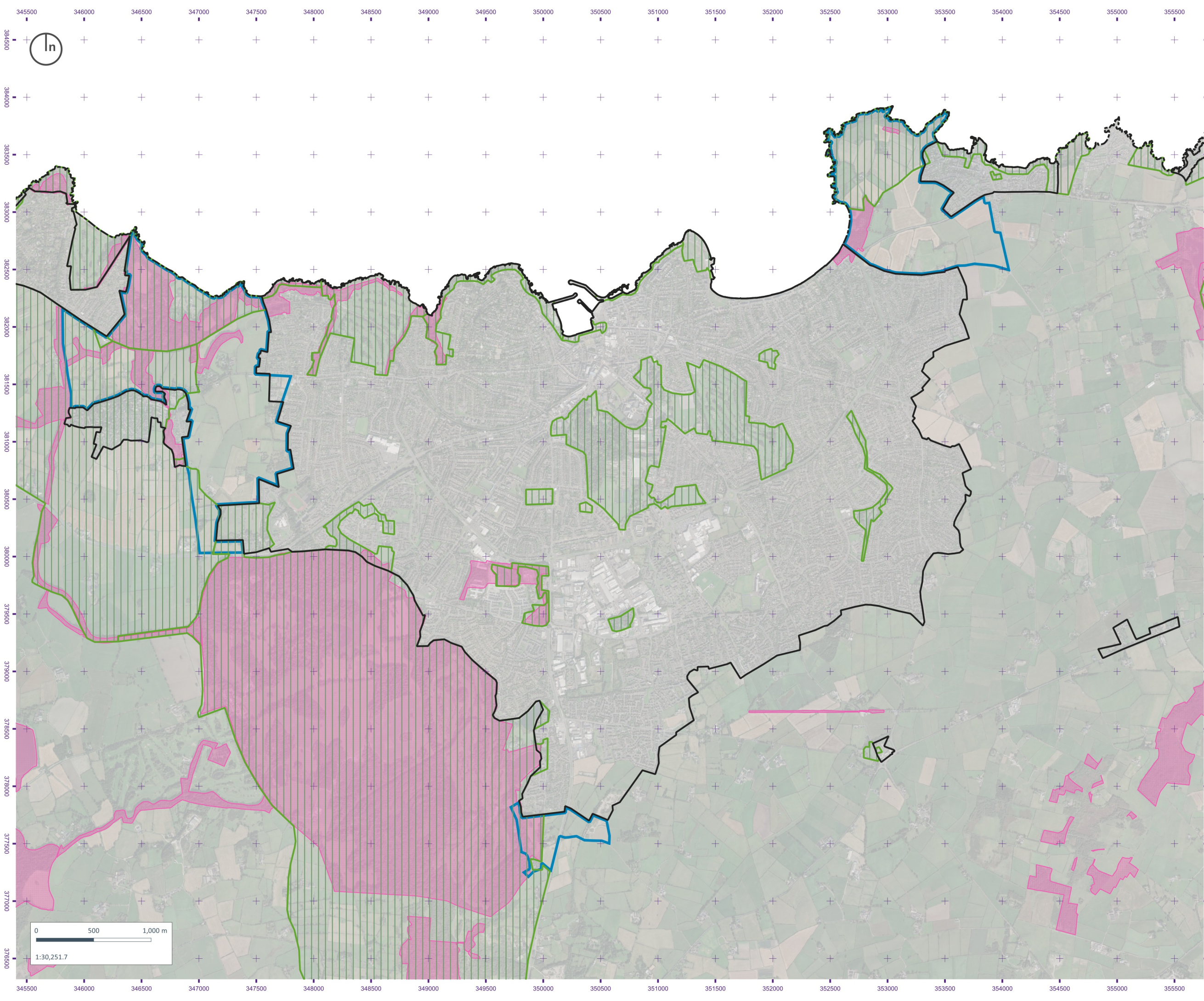
Site Ref	Location	ANDBC Figures (Housing Monitor 2023/2024)			Turley Figures (Site Visits Dec 2025)			Project Yield by 2030	Extant PP (Y/N) & PP Ref (if applicable)	Comments
		Development Status (Not Started/ Ongoing/ Complete)	Housing Units Complete	Remaining Potential	Development Status (Not Started/ Ongoing/ Complete)	Housing Units Complete	Remaining Potential			
17149	Lands at 169 Rathgael Road / School Avenue, Bangor	Ongoing	249	102	Ongoing	249	90	90	LA06/2016/0596/F	Lagan Homes - Lakeview apartments - 75-80% complete Area beside Woodlands Juvenile Justice Centre - 90% complete. This Development will be completed within next 6 - 9 months - School Avenue Area indicated is built out.
20874	Lands 30m North of 11-12 Rosstown Meadows Bangor	Ongoing	18	222	Ongoing	140	0	0	LA06/2021/1012/F- under consideration	Planning Approval now sought for 157 Units and currently still undetermined. If approved this will be 65 Units less than what Council state. If Planning was granted in 2026 and Mr Bell decided to sell this could produce approx. 120 - 140 units by 2030 - however it is not clear whether Mr Bell will sell. It must also be noted that this application was lodged in 2021, and as yet is not approved. Council have a claimed potential supply of 240 at this site. The above application and existing permissions would equate to 173.
15423	58 & 60 Green Road, Conlig, Newtownards, BT23 7PZ	Ongoing	496	83	Ongoing	496	83	0	W/2003/1085/F	Remaining units not brought forward in over 7 yrs. This is the remaining lands out of Approval W/2003/1085/F for 176 Plots. These lands have the benefit of a CIUD. Approx 35-40% complete - construction on Bailey Lea development continuing and will yield the remaining plots by 2030.
15416	Land Bounded By Dellmount Avenue And Fairfield Road Bangor	Ongoing	9	37	Completed	56	0	0	N	This Area as highlighted on the plan is now built out except for James G McAlorum builder's yard and old Dellmount House. This is unlikely to produce any further plots during plan period as it is Builders Head Office and Workshop etc.
19940	110 Hamilton Road Bangor	Not started	0	31	Not started	0	19	19	N	This is the remaining portion of land left over from Premier Inn Bangor Hotel - no works commenced on Site. We should assume that this will yield approved plots by 2032
449914	116 Clandeboye Road, Bangor	Not started	0	20	Ongoing	20	0	0	LA06/2021/0773/F	This Development Site is currently under construction and will yield the approved number by 2032.
18143	Adjacent to Conlig Resource Centre, Coronation Avenue, Conlig	Not started	0	12	Not started	12	0	0	N	Very hard to locate this site. No works commenced on site. We have to assume it will produce 12 plots by 2032.
19945	Former Leisure Centre site at Castle Park Avenue Bangor BT20 4BN	Not started	0	19	Not started	19	0	0	N	This is the remaining portion of land left over from Premier Inn Bangor Hotel - no works commenced on Site. We should assume that this will yield approved plots by 2032.
21532	196 Seacliff Road Bangor	Not started	0	17	Not started	0	17	0	N	PP expired for 17 no. units (apartments) Live PP for 6 no. units (houses) Most recent PP for alterations to existing church Kings Church/School on this site has just completed. £1 million refurbishment of church premises; no likelihood of the site being used for development - ZERO PLOTS BY 2032.
16563	Site 1 Killaire House, 22 Killaire Road Bangor Co Down BT19 1EY	Not started	0	1	Completed	0	1	0	LA06/2022/0502/F	
16564	Sites 2 and 3 Killaire House, 22 Killaire Road Bangor Co Down BT19 1EY	Not started	0	2	Completed	0	2	0	N	Development has commenced and will likely yield.
16594	Land to rear of Millbank, Donaghadee Road, Bangor	Not started	0	12	Not started	0	12	0	N	This land is prone to frequent flooding from Cotton River. It is extremely poor ground for foundations - not likely to be built on as it is unattractive to developers. This will be a ZERO PLOTS by 2032.
16877	Land adjacent to 49 Green Road Conlig Co Down	Complete	41	0	Completed	41	0	0	N	
17130	Lands bounded by 18-52 66 and 68 Main Street 2-51 King Street 5-18 Southwell Road 5-41 Queen's Parade and Marine Gardens car park Bangor	Not started	0	137	Ongoing	137	0	0	N	Wider development has commenced along Queens Parade/Waterfront and therefore could be delivered in the plan period.
17132	Lands to the south and east of St Gatts Church Crawfordsburn Road	Ongoing	24	40	Ongoing	54	30	30	LA06/2020/0221/F	This Development Site is 90% complete and will be completed within 6-9 months. There will be no further plots yielded from 2026 onwards to 2032.
18144	Land Between 433 and 451 Old Belfast Road, Bangor	Not started	0	9	Not started	0	9	0	N	NI Water waste water pumping station and large open water course along western boundary - 6M Exclusion Area for these - Possibly could yield these plots by 2032.
18147	Clanmorris Campus Playing Fields, Balloo Road	Not started	0	125	Not started	0	125	0	LA06/2022/0873/F	No PP for residential use This is land which Council set out as yielding 351 plots; is within Bangor Grammar School. This first site (125 Plots) has full planning permission for Relocation of Central Primary School and this will be the use for the site. The EA are complying with Planning Conditions on an ongoing basis. This site will yield ZERO Plots during plan period.
18453	Side garden to south of 29 Maxwell Road Bangor	Not started	0	1	Not started	0	1	0	LA04/2024/0387/O	Outline approval - No RM application submitted
18518	Lands to rear of no's 77-85 Crawfordsburn Road, Camalea, Bangor	Ongoing	10	2	Complete	12	0	0	N	
19078	80 Southwell Road Bangor	Complete	14	0	Complete	14	0	0	N	

Bangor Housing Land Supply Assessment

19106	Land to the rear of 24 Killaire Park and adjacent to 2, 4 & 6 Downhill Avenue, Bangor with access onto Carnalea Park adjacent to No 4, BT19 1EG	Not started	0	1	Not started	0	1	0	N	Development does not appear to have commenced, 1 year is remaining on the permission and so could potentially yield through CLUED.
19111	Site immediately adjacent and south-west of 69 Bryansford Meadow Bangor BT20 3NX	Not started	0	1	Not started	0	1	0	LA06/2022/0702/F	Existing garage remains, with no signs of development. 3 years remain on the planning permission and so could yield in plan period.
19120	429-431 Old Belfast Road, Bangor.	Not started	0	4	Not started	0	4	0	N	
19970	Land to rear of no 459 Old Belfast Road Bangor	Not started	0	1	Not started	0	1	0	N	Development has not commenced and so permission has lapsed – ZERO
19976	Land Adjacent To 2 Silverstream Avenue Bangor	Not started	0	1	Not started	0	1	0	Y	Development has not started or commenced, with 2 years remaining on the permission and so could yield.
19986	Site to the rear of Balmoral Close with access onto the junction of Balmoral Road and Willowbrook Road, Bangor	Complete	51	0	Complete	51	0	0	N	
20401	117A Donaghadee Road, Ballyholme, Bangor, Co. Down BT20 4NT & 7 Summerhill Park, Ballyholme, Bangor, BT20 5QQ	Complete	7	0	Complete	7	0	0	N	
20729	The Royal Hotel and Windsor Bar, 22-28 Quay Street, Bangor	Not started	0	33	Not started	0	33	0	N	Hearings surround the site but no development appears to have commenced. Programme of Archaeological Works (no site work of any nature to take place) condition discharge was refused in August 2023 and no subsequent application has been submitted. Permission has therefore lapsed.
21005	184 To 229 Ballycrochan Road, Bangor	Ongoing	41	11	Ongoing	39	13	13	W/2003/0185/RM	This is Ashfield Hall development by Boland Reilly Homes – 39 units built; noted Council state 0 LPA Remaining Yield – Approx 13 remaining units around farmer's main dwelling; family has no plans for relocating as main dairy farm is located here.
21072	North of South Circular Road, Bangor	Not started	0	17	Not started	0	17	0	N	Development Site cleared but no works commenced on site. No obvious restraints to developing all plots by 2032.
21122	Land adjacent to 15 Ashbury Court Bangor	Not started	0	1	Not started	0	1	0	N	PP expired – development has not commenced and so lapsed – ZERO
21541	131 Crawfordsburn Road and 2a Wandsworth Road Bangor	Ongoing	3	2	Complete	5	0	0	N	3 dwellings completed and 2 foundations have been laid; development could yield the full amount.
30018	11A Grays Hill	Not started	0	1	Not started	0	1	0	N	PP expired and development has not commenced.
30072	108 Dufferin Avenue	Not started	0	2	Complete	2	0	0	N	PP expired – development has commenced and appears to be occupied.
449680	271 Old Belfast Road Bangor (Amended Address)	Not started	0	9	Ongoing	0	9	9	LA06/2021/0649/F	PP for residential care home – partial foundation evident. 2025 application still undergoing consultation with NI Water objection and DfI Rivers request for additional information. 2021 application could benefit from CLUED and therefore 9 units could yield.
449683	Lands to the rear of 74 and 76 Donaghadee Road Bangor BT20 4QX	Ongoing	0	1	Complete	1	0	0	N	Construction close to finished.
449692	Immediately south of 84 Crawfordsburn Road, Bangor, BT19 1BE	Complete	1	0	Complete	1	0	0	N	
449736	1 Gransha Road, Bangor	Not started	0	9	Not started	0	9	0	N	No live PP – site cleared but no foundations laid. Permission lapsed- ZERO
449737	Lands immediately adjacent to the North of 53 Old Bangor Road, Conlig	Not started	0	1	Not started	0	1	0	N	No development has commenced, existing outbuilding remains and permission has lapsed. – ZERO
449766	Land immediately adjacent to and NE of 9 Jubilee Drive Bangor	Complete	1	0	Complete	1	0	0	N	
449780	114 Princetown Road, Bangor	Not started	0	5	Complete	5	0	0	N	Development has not started with 5 years remaining to the permission. The units could therefore yield.
449787	Blocks B and C Savoy Apartments, Broadway, Bangor	Complete	9	0	Complete	9	0	0	N	
449820	Lands to the rear of 15 and 17 Ballymacconnell Road Bangor including lands to the west of 1 Portview	Not started	0	1	Complete	1	0	0	N	Existing garage has not been demolition and no work commenced with 1 year remaining on the permission. Development could occur and the site would then benefit from a CLUED to develop out.
449822	72 Groomsport Road, Bangor	Complete	4	0	Complete	4	0	0	N	
449824	Existing stone barn building located between 6 Maxwell Lane and 8-8a Maxwell Lane, Bangor	Not started	0	1	Complete	1	0	0	N	Development has been completed and is occupied
449840	Side garden at 19 Tudor Park Bangor	Not started	0	1	Complete	1	0	0	N	This is a renewal of an OPP in 2021 and granted in 2025, with no RM submitted to date but could yield during plan period.
449845	Ground floor 28 Dufferin Avenue Bangor	Not started	0	1	Complete	1	0	0	N	Development has been completed and is occupied
449859	6 6A 6B & 8 Primrose Street (including lands to rear of 19 21 23A-D & 25 Gray's Hill Bangor	Not started	0	4	Complete	4	0	0	N	Development is ongoing and looks to be well advanced to complete.
449860	Tennis court and access corridor to the east of Ballykillaire House at 2 Killaire Road Bangor	Not started	0	1	Complete	1	0	0	N	Development appears to be ongoing and therefore will yield.
449862	Side garden of 2 Robinson Road Bangor	Not started	0	1	Ongoing	1	0	0	N	Foundation have been laid and development looks to be advancing and so able to yield.
449871	Lands immediately adjacent to and to the rear of 80-82 Gransha Road, Bangor	Ongoing	6	3	Ongoing	9	0	0	N	Development for 6 units complete with foundations in place and work continuing for remaining 3 and so will yield.

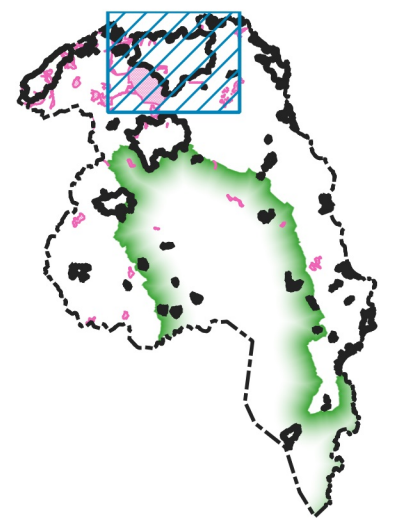
449902	1st Floor 61-63 High Street, Bangor	Complete	2	0	Complete	2	0	0	N		
449903	77 Southwell Road, Bangor	Not started	0	5	Ongoing	5	0	0	N	Development appears to have upgrade works completed and occupied.	
449905	12 Silverbirch Avenue, Bangor	Complete	1	0	Complete	1	0	0	N		
449906	35 Lynne Crescent (Side Garden) Bangor	Not started	0	1	Ongoing	1	0	0	N	Foundations have been laid and development appears to be well commenced and so could yield.	
449907	Rear garden of existing dwelling at 3 The Elms, Bangor	Not started	0	1	Not started	1	0	0	N	No development has commenced however 3 years remain on the permission and so could yield.	
449909	Land immediately adjacent to & NE of 23 Woodvale Gardens Bangor	Not started	0	1	Ongoing	1	0	0	N	Development is ongoing and near completed and so will yield.	
449912	10 Seymour Avenue, Bangor	Not started	0	1	Not started	1	0	0	LA06/2021/0183/F	Original dwelling remains with no sign of development however 3 years remain on permission and so could yield.	
449917	Land to the rear of 28-30 Southwell Road, Bangor, BT20 3GG (access via Primrose Lane)	Not started	0	1	Not started	1	0	0	LA06/2021/0765/F	Original storage facility remains, no development has commenced however 3 years; remain on the permission remains and so could yield.	
449920	64 Broadway, Bangor	Not started	0	1	Not started	1	0	0	LA06/2023/1981/F	Development has not started however 3 years remain on the permission and therefore could yield.	
449924	Side garden of 2 Talbot Drive, Bangor	Not started	0	1	Complete	1	0	0	N		
449925	46 Newtownards Road, Bangor	Not started	0	1	Not started	1	0	0	LA06/2021/0282/F	Development has not commenced. However there is 3 years remaining on the permission and so could yield.	
449928	13 Clifton Road, Bangor	Not started	0	1	Not started	1	0	0	LA06/2022/0584/F	Development has not commenced. However there is 4 years remaining on the permission and so could yield.	
449930	Lands adjacent to Seacourt Maxwell Drive 33m East of 3-6 Seacourt 39m South of 4 Seacourt Garden 24m West of 1-2 Seacourt Garden and 8m North	Not started	0	7	Ongoing	7	0	0	LA06/2021/0419/F	Development has not commenced however there is 4 years remaining on the permission and so could yield.	
449935	Lands to the immediate south of No.68 Balmoral Square, Bangor	Not started	0	1	Not started	1	0	0	LA06/2023/2090/F	Development has not commenced however there is 4 years remaining on the permission and so could yield.	
449937	28 and 30 Bryansburn Road, Bangor	Not started	0	2	Ongoing	2	0	0	LA06/2022/1286/F	Development has not commenced however there is 4 years remaining on the permission and so could yield.	
19120	429-431 Old Belfast Road, Bangor.	Not started	1	4	Not started	4	0	0	N	Existing dwellings on this site Possible to yield 3 units by 2032.	
TOTAL				1013		481					
Bangor Urban Capacity Sites (UCS)	2	77 Rathgael Road	Not started	0	12	Not started	0	12	0	N	
	3	45-49a Old Bangor Rd	Not started	0	17	Not started	0	17	0	N	
	4	72 Old Road Bangor	Not started	0	5		5				
	5	190 Rathgael Road, Bangor	Not started	0	10	Not started	0	10	0	N	
	7	Land at 3 and 6 Lyndhurst Crescent	Not started	0	5		5				
	8	Rathgael Veterinary Clinic, 24-26 Brook Lane, Bangor	Not started	0	16	Not started	0	16	0	N	
	10	20-32 Green Road, Bangor	Not started	0	24	Not started	0	24	0	N	
	11	40 and 46 Green Road	Not started	0	9		9				
	13	12 Balloo Road	Not started	0	7		7				
	15	1A- 1B Faulkner Road, Bangor	Not started	0	20	Not started	0	20	0	N	
	17	9 and 11 Silverstream Road	Not started	0	6		6				
	18	165-175 Belfast Road, Bangor	Not started	0	15	Not started	0	15	0	N	
	19	Cargo Coffee, USA hand car wash and Richard Dorrian Car sales, Site opposite Nos. 25-73 Belfast Road and directly west of No. 16a Belfast Road Bangor.	Not started	0	29	Not started	0	29	0	N	
	21	96b, 96c and 96d Abbey Street	Not started	0	7	Not started	0	7	0	N	
	24	56A Grensha Road	Not started	0	7	Not started	0	7	0	N	
	26	229 and 230 Ballycrochan Road	Not started	0	5	Not started	0	5	0	N	
	28	Manse at 108 Old Gransha Road	Not started	0	8	Not started	0	8	0	N	
	32	79 Bellevue and 135 Donaghdee Road	Not started	0	6	Not started	0	6	0	N	
33	145 Groomsport Road	Not started	0	8	Not started	0	8	0	N		
34	123 Groomsport Road	Not started	0	5	Not started	0	5	0	N		
TOTAL			0	221		0	221			No planning history: limited prospects.	
Bangor Development Opportunity Sites (DOS)	DOS BR 1	Flagship Centre, Main Street, Bangor.	Not started	0	119	Not started	0	119	0	N	
	DOS BR 4	Land to the rear of 15a – 23 Clifton Road and 8 - 30 Stanley Road, and end of Stanley Avenue, Bangor	Not started	0	29	Not started	0	29	0	N	
	DOS BR 7	Hamilton House, 43 Hamilton Road, 56a Hamilton Road and 1a Springfield Avenue, Bangor	Not started	0	15	Not started	0	15	0	N	
	DOS BR 11	Public car park to the rear of Nos. 41-47 Central Avenue, Nos. 66-80 Southwell Road and Nos. 48-68 Dufferin	Not started	0	13	Not started	0	13	0	N	
	DOS BR 12	Land approximately 50m south east of Premier Inn, 7 Castle Park Avenue, Bangor	Not started	0	15	Not started	0	15	0	N	
	TOTAL			0	191		0	191			No planning history: limited prospects.

Appendix 4: Bangor: Constraint Mapping



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- Local Wildlife Sites
- Area of Outstanding Natural Beauty
- Settlement Boundaries
- Landscape Wedge
- Local Landscape Policy Area



CLIENT:
 Lesley Bloomfield

PROJECT:
 ANDBC Rep - Lesley Bloomfield

DRAWING:
 Bangor Settlement Atlas

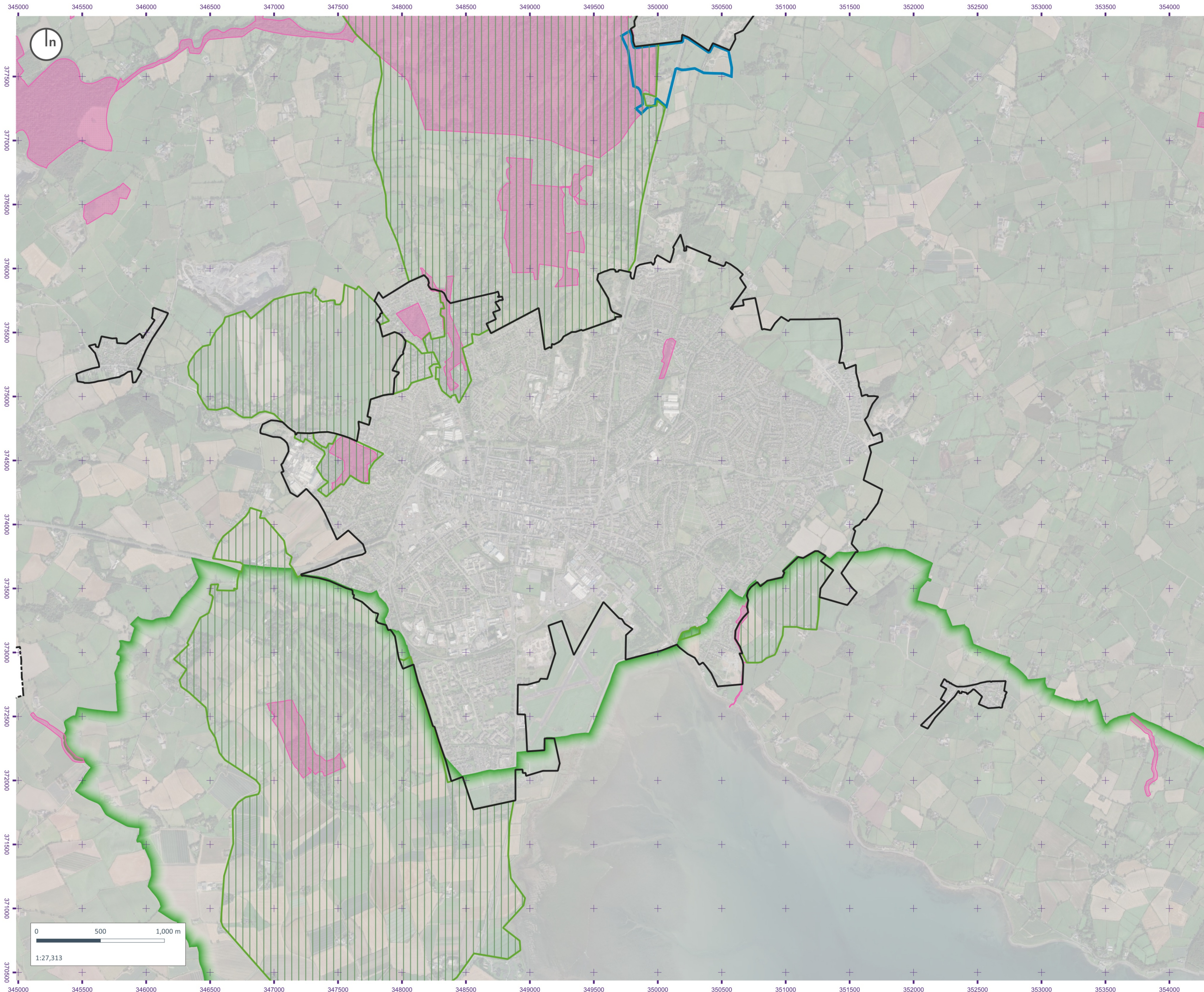
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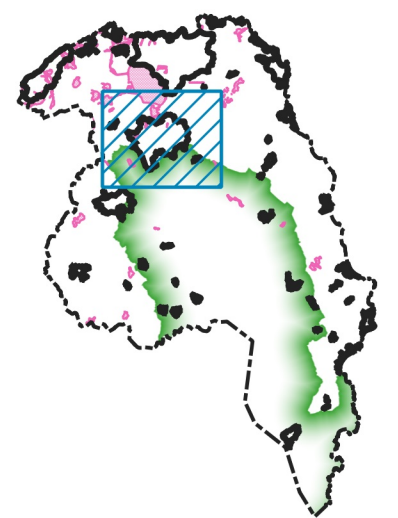
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-  Local Wildlife Sites
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CLIENT: _____
 Lesley Bloomfield

PROJECT: _____
 ANDBC Rep - Lesley Bloomfield

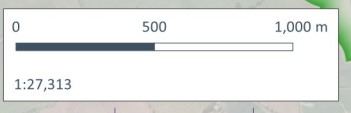
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