

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):

Antrim Construction & Dunlop Group

+ 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.

+ 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?

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 +

Ards & North Down draft Plan Strategy

Representation on behalf of Antrim Construction
Company Ltd & Dunlop Group

Hollywood

March 2026

Turley

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Client

Antrim Construction Company Ltd & Dunlop Group

Our reference

04394

13 March 2026

Executive Summary

Representation on behalf of Antrim Construction Company Ltd & Dunlop Group – Ards & North Down draft Plan Strategy

1. This submission, prepared by Turley on behalf of Antrim Construction Company Ltd (ACC) and the Dunlop Group is submitted in response to the Ards & North Down Borough Council's draft Plan Strategy (dPS). 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 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

2. **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.
3. **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.
4. **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

5. **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.
6. **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.

7. 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.

Soundness Issues Identified

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

Consistency Tests:

9. C1: Failure to fully account for the Regional Development Strategy's promotion of urban economic development at key locations throughout the BMUA (including Hollywood), which requires a complementary approach to housing strategy.
10. C3: Failure to take account of policy and guidance issued by the Department insofar as the LDP has not been prepared quickly.
11. C4: Insufficient regard for Belfast's lagging housing delivery and the Council's own Digital Strategy.

Coherence and Effectiveness Tests:

12. CE1: Lack of logical flow from the Spatial Growth Strategy to Hollywood's share of the SHA and in the phased housing land release approach, despite recognising the housing-employment relationship.
13. CE2/CE4: Unrealistic plan period and inability to adapt to changing circumstances, especially given current adoption trajectories.

Detailed Policy Commentary

14. 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 the principal settlements, particularly Newtownards to address this gap.
15. 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.
16. 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.
17. 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

18. 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.
19. 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.
20. Deliver on the Spatial Growth Strategy ambition to strengthen the town by increasing its allocation of the Strategic Housing Allocation (SHA).
21. Clarify and, where appropriate, streamline general and topic-specific policies to provide certainty for applicants, decision-makers, and stakeholders.
22. Ensure monitoring and review mechanisms are robust but not a substitute for sound plan-making at the outset.

Conclusion

23. This representation welcomes the Council's ambition and integrated approach but urges 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.
24. 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 Antrim Construction Company Ltd (ACC) and the Dunlop Group, and welcomes the opportunity to return comments on the Ards & North Down Borough Council draft Plan Strategy (dPS).
- 1.2 Founded in 1966, and based in Holywood, ACC remain a family business and are the principal company in the Ladyhill Holdings Group.
- 1.3 The Bangor based Dunlop Group is also a family-owned property business which has operated mainly in the North Down and Ards area for nearly 100 years.
- 1.4 The companies are familiar with the planning process, including the Local Development Plan (LDP) making process, having prior experience of both the Belfast Metropolitan Area Plan (BMAP) and Ards and Down Area Plan (ADAP) processes.
- 1.5 The companies 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.
- 1.6 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:** sets out our representations in response to the dPS Context and Vision (Part A);
 - **Chapter 4:** sets out our representations in response to the dPS Strategic Approach – Growth Strategy (Part B);
 - **Chapter 5:** sets out our representations in response to the dPS General Policies applying to all development (Part C);
 - **Chapter 6:** sets out our representations in response to the dPS Strategic and Operational Topic Policies (Part D);
 - **Chapter 7:** sets out our representations in response to the dPS proposals for Monitoring and Review (Part E);
 - **Chapter 8:** sets out our analysis of how growth can be accommodated in Holywood.
- 1.7 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:
 - 2.5 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
 - (i) whether it is sound.
 - (ii) 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;
 - the issues, not unique to the Borough, around sewerage and water infrastructure.
- 3.2 ACC and the Dunlop Group welcome the acknowledgement at para 1.116 that some of these issues require collaborative approaches and commitments to address. The companies welcome the opportunity to highlight, through this and previous submissions, that they 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 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) is as follows:



- 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	48
Antrim & Newtownabbey	March 2027	18
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

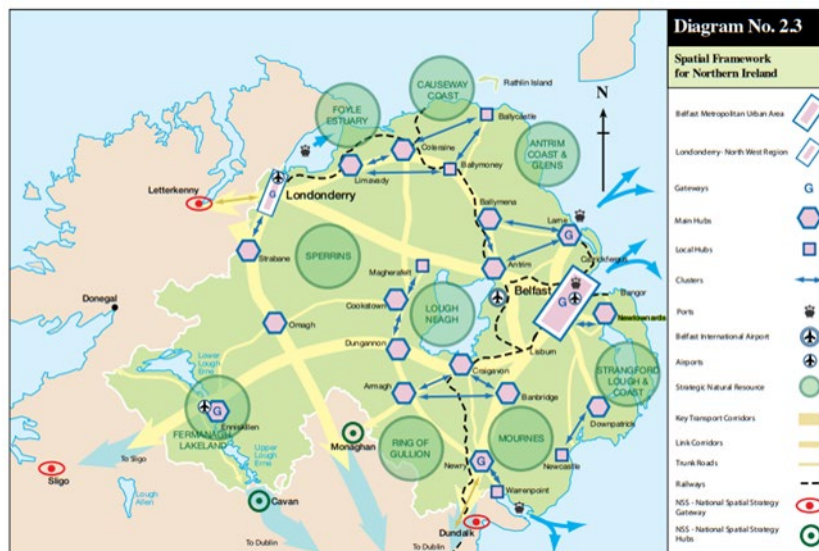
- 3.17 Is not met because for the reason stated above, it will not be able to deal with changing circumstances.

4. Part B – Strategic Approach – Growth Strategy

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

- 4.1 The Borough profile acknowledges that Holywood is the fourth largest population centre in AND, the healthiest of the town centres in terms of vacancy levels (13.3%) and well connected from a transport perspective with a rail halt. Its built and natural environment assets are also highlighted.
- 4.2 The Spatial Growth Strategy is to consolidate and strengthen the role of Holywood as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough.
- 4.3 The reference to strengthening the role of Holywood in this second bullet point of the SGS communicates an ambition beyond consolidation, which is the plan’s strategy for Comber, Donaghadee and Portaferry.
- 4.4 The town’s BMA role and status is important. It is physically part of the Belfast Metropolitan Urban Area (BMUA). The Plan’s Strategic Housing Market Assessment (SHMA) reports on p28 that Holywood is the largest ‘medium’ town in the BMA, based on 2011 Census data.

Figure 4.1: RDS Spatial Framework for NI



- 4.5 In terms of the potential to support a growing digital and creative industry within the Borough, the analysis set out in paragraphs 7.10 to 7.11 of Economic Development Technical Supplement 2 has been built on by the Council’s Digital Strategy and positive marketing of the potential for Holywood to host a Digital innovation hub as part of the Belfast City Region Deal. The brochure at Appendix 2 highlights the attractive features of Holywood to encourage talent to both live and work in the town given the high quality of life available. The important connection between jobs and housing is reflected in the RDS.

- 4.6 Given the plan’s strategy for Holywood it is somewhat surprising that the ambition to strengthen the town is not reflected in its allocation of the Strategic Housing Allocation (SHA) – see below.

SGS 3: Strategic Allocation of Economic and Industrial Land

- 4.7 Given the important connection between the delivery of jobs and homes, we would support this policy.
- 4.8 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*
- 4.9 It is also observed that the dPS acknowledges the challenges relating to worsening affordability: *‘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

- 4.10 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).
- 4.11 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.
- 4.12 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

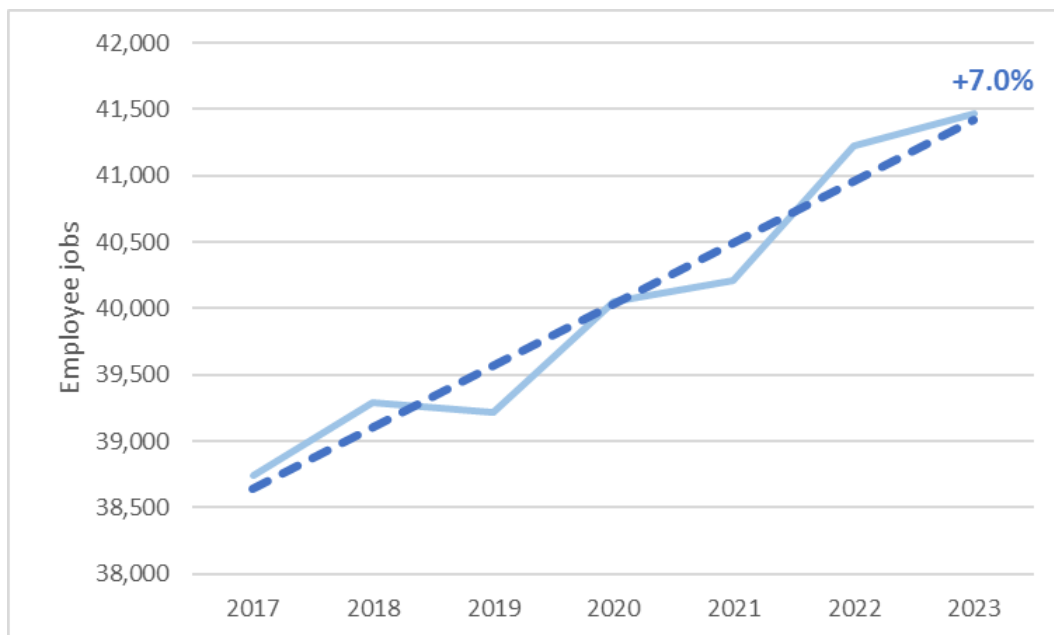
¹ Ards and North Down Local Development Strategy (2025), paragraphs 2.45 and 2.46

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

‘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.

- 4.13 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...*’. 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.
- 4.14 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

- 4.15 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.
- 4.16 The study identified a sufficient pipeline of potential employment generating projects. Indeed, it identified, based on 20 ‘direct interventions’ along with calculated indirect

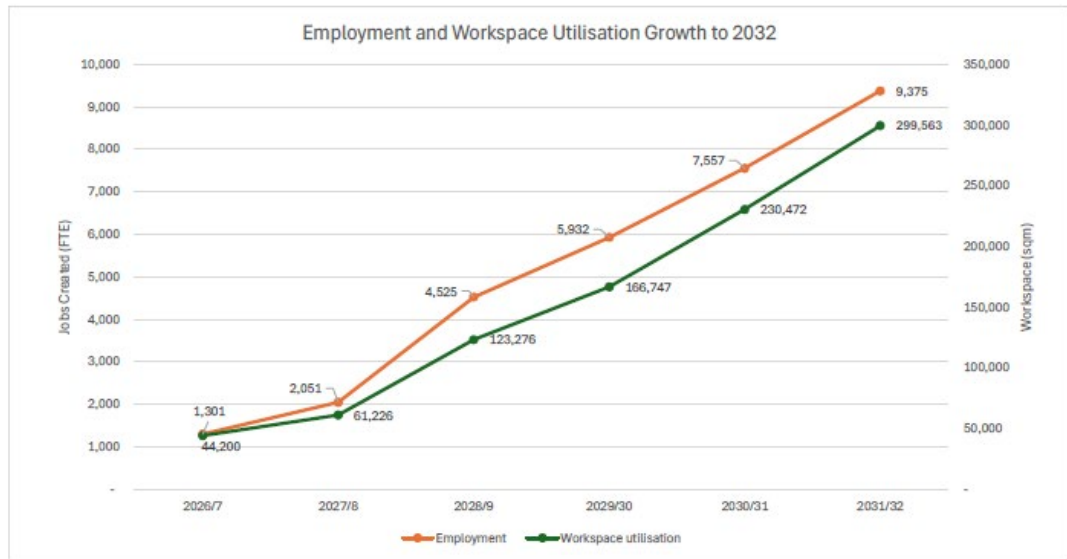
³ Ards and North Down Local Development Strategy (2025), paragraphs 1.84 and 1.85

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

- 4.17 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 employment generation could be expected, therefore exceeding the Draft Plan's target. This recognises:
- 4.18 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...);
- 4.19 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; and
- 4.20 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

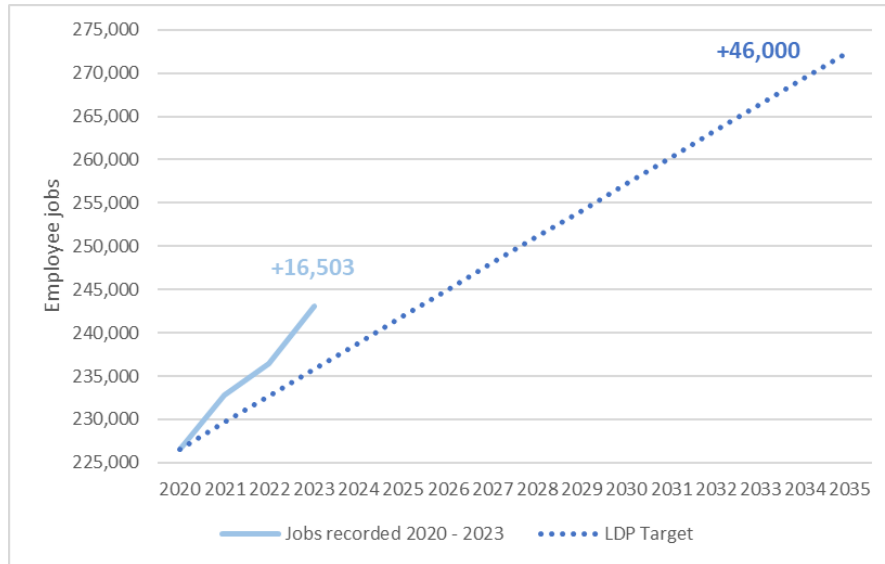
- 4.21 In this context and in considering the relationship with housing the Council commissioned detailed demographic projection modelling work from Edge Analytics. The output of this analysis is presented in a separate technical report and then summarised in a ‘*Technical Supplement 3 Housing*’.
- 4.22 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.
- 4.23 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

- 4.24 As referenced above the dPS acknowledges the important relationships between Ards and North Down and Belfast, including the planned investment across the Belfast Region.
- 4.25 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

- 4.26 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.
- 4.27 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.
- 4.28 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.
- 4.29 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 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.

- 4.30 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. Furthermore, in terms of C1, it does not have regard to the RDS insofar as promoting urban economic development at key locations throughout the BMUA (inc Holywood) requires a complementary approach to housing strategy.

The need for an extended Plan period

- 4.31 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.
- 4.32 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.
- 4.33 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.
- 4.34 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.
- 4.35 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.
- 4.36 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

- 4.37 The approach proposed through the *Spatial Growth Strategy (SGS 1)* is broadly supported and specifically the intent to: '*consolidate and strengthen the role of Holywood as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough.*'

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.*'

4.38 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 4.1: 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 Road	Bangor	1.22	0.23
Bangor Road	Newtownards	5.87	5.87
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	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

4.39 With there being no existing strategic employment land allocated to Holywood, and no plan to change this, it is important to seek to accommodate the growing digital and creative industry in other ways.

SGS 4: Strategic Housing Allocation (SHA)

4.40 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.

4.41 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.

4.42 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 4.2: 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		

4.43 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.

SGS 5: Strategic Housing Allocation across settlements

4.44 The plan’s ambition to strengthen the town is not reflected in its allocation of the Strategic Housing Allocation (SHA). With an allocation one third that of Comber, half of Donaghadee and equal to Portaferry, it is also disproportionately low in respect of the relative scale of Holywood, as set out in the table below.

Table 4.3: Small Town Share of SHA & Borough Population

	Allocation	% of SHA	Population	% of Borough
Comber	1193	9.43	9529	5.82
Donaghadee	795	6.29	7325	4.48
Holywood	398	3.15	10757	6.57
Portaferry	398	3.15	2372	1.45
SHA	12649		163659	

- 4.45 Having reviewed the profile of Holywood in Technical Supplement 2, it is apparent that the allocated share of the SHA may have been driven by an acute awareness of the perceived constraints to outward growth of the town. It is notable that there is no reference to the potential growth associated with the town’s role as a digital hub. Whilst there are legitimate constraints to lateral growth, these will be reviewed in detail at LPP stage and, in any event, a higher allocation should still have been anticipated given the ambition of the plan’s growth strategy. The allocation is out of line with the stated growth ambition for the town.
- 4.46 This is important because there is a disconnect between the Council’s well founded and welcome integrated approach between jobs and housing. Given the stated potential to grow the digital economy from a Hub in Holywood, and the role this could perform in the Council’s success scenario, it is important to ensure that there is an adequate choice and supply of homes able to accommodate the talent that the Council aims to attract to work in the digital sector in the town.
- 4.47 With the expectation of salaries higher than those available in, for example, traditional industries, this talent is likely to want to access higher value housing opportunities, which may not necessarily be reflected within the identified sources of housing land supply. With a constrained view of housing development in the town it will become even more difficult to compete with Belfast when seeking to retain and attract talent - issues described as key and recurring in the Council’s Digital Strategy (p 30) – C4.
- 4.48 With the town’s BMUA location and its proximity to Titanic Studios, Studio Ulster and rail connectivity to Belfast City Airport, its high quality shops and restaurants and coastal setting all contributing to a high quality of life – as reflected in the Sunday Times recognition of best places to live – it has the potential to attract growing companies who aim to recruit and retain talent which is increasingly likely to wish to live closer to work. None of the other towns within the Small Town tier of the Settlement Hierarchy have this set of attributes.
- 4.49 With a share of the SHA which is tending towards constraint, rather than strengthening or growth, the plan’s approach to housing in Holywood risks undermining its ambitious economic vision (CE1). It could also undermine the Council’s role in supporting the RDS’s guidance (SFG1) to promote urban economic development at key locations throughout the BMUA (C1).

SGS6: Management of Housing Land Release

- 4.50 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.
- 4.51 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.
- 4.52 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
- 4.53 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.
- 4.54 It concludes that where neither of these two conditions are met, planning permission for the development of Phase 2 lands will be refused.
- 4.55 Justification and amplification is provided in paragraphs 2.55 to 2.59.
- 4.56 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.
- 4.57 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).
- 4.58 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)*

4.59 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.

4.60 In terms of actual scoring:

Figure 4.5: Extract from Sustainability Appraisal

	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

4.61 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.

4.62 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).

4.63 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.

4.64 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.
- 4.65 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.
- 4.66 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:
- 4.67 Given that the ‘best case’ point of release of new land is four 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;
- 4.68 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;
- 4.69 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;

4.70 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.

4.71 It would not be appropriate to introduce it to the Small Towns if it is not being introduced to the Principal Settlements.

4.72 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;

4.73 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;

4.74 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;

4.75 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.

- 4.76 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).

- 4.77 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.

- 4.78 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).

- 4.79 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.

- 4.80 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.

- 4.81 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.

- 4.82 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.

- 4.83 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.

- 4.84 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.

- 4.85 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.
- 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 Holywood

- 8.1 The focus of this submission has been strategic and makes the case for ensuring that the plan's strategy ambition for Holywood (consolidate and strengthen its role as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough) is not frustrated by a disconnect with the housing strategy.
- 8.2 We recognise that consideration of the locations of any future zonings is for the LPP but it is important to explain our analysis of the town's capacity to grow.
- 8.3 Backed by the RDS step change towards housing development within established urban areas, the generally high quality townscape in Holywood has been eroded by the demolition of existing housing stock and its replacement with more intensive apartment and townhouse developments. A very modest release of some greenfield land would provide an alternative location for development.
- 8.4 The settlement limit should protect the setting of the town, but this general objective would not preclude minor change in appropriate locations given the strategic context. A balance needs to be struck whereby a modest level of development can be accommodated within the town, avoiding overreliance on the existing urban area to the detriment of both the protected and unprotected townscape, and the need to ensure that the town grows in as compact a way as possible, avoiding urban sprawl.
- 8.5 The outward expansion of Holywood is limited by its coastal location and its proximity to surrounding settlements. Development opportunities in the south and north are restricted by the rural landscape wedges which separate Holywood from East Belfast and Seahill. To the south east an Area of High Scenic Value (AHSV) restricts the opportunity for expansion.
- 8.6 The only opportunity, for the modest level of expansion required is for a limited adjustment in the central part of the eastern edge of the town. Where the Belfast Urban Area Plan (BUAP) 2001, Area of High Scenic Value (AOHSV) has been removed, leaving land between Church Road and Browns Brae without any landscape designations and land east of Brown's Brae with a lesser, Local Landscape Policy Area (LLPA) designation.
- 8.7 This part of the urban edge, which is already partly developed around the Ballymenoch Road/Creightons Green Road area and traversed by the 100m contour should be the focus of attention at the Local Policy stage of the process. The main purpose of this representation is to identify the opportunity for a very modest adjustment to the settlement limit in future.
- 8.8 Relevant plans identifying the opportunity are at Appendix 3. These show how three or six houses might be delivered in addition to a localised road improvement.

Appendix 1: POP Representation

**Response to Ards & North Down Preferred
Options Paper**
Antrim Construction Company & Dunlop
Developments Ltd in respect of Ballymenoch
Road, Holywood

August 2019

Turley

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Client

Antrim Construction Company & Dunlop Developments Ltd

Our reference

ANTB3003

9 August 2019

Executive Summary

1. This response has been prepared on behalf of Antrim Construction Company and Dunlop Developments, both long standing North Down based companies focused on the growth and development of the Borough. The companies welcome the opportunity to join the debate on the key issues of strategic significance which will influence future development within the Borough.
2. The companies' analysis is that Holywood has a very low housing allocation considering the population of the town and a modest uplift is required in order to provide a proportionate level of growth.
3. Backed by the RDS step change towards housing development within established urban areas, the generally high quality townscape in Holywood has been eroded by the demolition of the existing housing stock and its replacement with more intensive apartment and townhouse developments. The release of some greenfield land, consistent with the RDS small sites approach would provide an alternative location for development.
4. A very modest increase in the housing allocation to Holywood would also 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.
5. 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.
6. 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.
7. 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 directions set in the Regional Development Strategy (RDS).

8. 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 Antrim Construction Company (ACC) and Dunlop Developments Ltd.
- 1.2 Founded in 1966, ACC is a family business and the principal company in the Ladyhill Holdings Group. Following the acquisition in 1994 of John Mowlem Homes NI Division, ACC has been based in Holywood.
- 1.3 Bangor based Dunlop Developments Ltd is part of the Dunlop Group of companies. The Dunlop Group is a family owned property business which has operated mainly in the North Down and Ards area for almost 100 years.
- 1.4 As generational businesses rooted in their local communities, both companies have a keen interest in planning and the delivery of quality neighbourhoods that meet the needs of current and future generations of Ards and North Down residents.
- 1.5 The companies are familiar with the planning process, including the Local Development Plan (LDP) making process, having prior experience of both the Belfast Metropolitan Area Plan (BMAP) and Ards and Down Area Plan (ADAP) processes.
- 1.6 The companies 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.
- 1.7 This response should be read alongside the questionnaire response at Appendix 1 which has also been submitted separately consistent with the Council advice.
- 1.8 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 respect of 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 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.
- 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 Holywood

Introduction

- 3.1 The companies have a long standing interest in Holywood and were represented during the Public Examinations on the Regional Development Strategy and its 5-Year Review, and in the Public Local Inquiry into objections to draft BMAP.
- 3.2 The companies' analysis is that Holywood has a very low housing allocation considering the population of the town and a modest uplift is required in order to provide a proportionate level of growth.

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 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'.
- 3.5 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. A settlement appraisal of Holywood is at Appendix 2.
- 3.6 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

- 3.7 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.
- 3.8 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.

- 3.9 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.
- 3.10 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".
- 3.11 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.

Housing to Support Economic Growth

- 3.12 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.
- 3.13 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'*.
- 3.14 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

- 3.15 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.

- 3.16 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.
- 3.17 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

- 3.18 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.
- 3.19 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.

Hollywood – the Case for Modest Growth

- 3.20 Backed by the RDS step change towards housing development within established urban areas, the generally high quality townscape in Hollywood has been eroded by the demolition of the existing housing stock and its replacement with more intensive apartment and townhouse developments. The release of some greenfield land, consistent with the RDS small sites approach would provide an alternative location for development.
- 3.21 A very modest increase in the housing allocation to Hollywood 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 4).

Accommodating Growth in Hollywood

- 3.22 The settlement limit should protect the setting of the town, but this general objective would not preclude minor change in appropriate locations given the strategic context. A balance needs to be struck whereby a modest level of development can be accommodated within the town, avoiding overreliance on the existing urban area to the detriment of both the protected and unprotected townscape, and the need to ensure that the town grows in as compact a way as possible, avoiding urban sprawl.
- 3.23 The outward expansion of Hollywood is limited by its coastal location and its proximity to surrounding settlements. Development opportunities in the south and north are restricted by the rural landscape wedges which separate Hollywood from East Belfast and Seahill. To the south east an Area of High Scenic Value (AHSV) restricts the opportunity for expansion.
- 3.24 The only opportunity, for the modest level of expansion required is for a limited adjustment in the central part of the eastern edge of the town. Where the Belfast Urban Area Plan (BUAP) 2001, Area of High Scenic Value (AOHSV) has been removed, leaving land between Church Road and Browns Brae without any landscape designations and land east of Brown's Brae with a lesser, Local Landscape Policy Area (LLPA) designation.
- 3.25 This part of the urban edge, which is already partly developed around the Ballymenoch Road/Creightons Green Road area and traversed by the 100m contour should be the focus of attention at the Local Policy stage of the process. The main purpose of this representation is to identify the opportunity for a very modest adjustment to the settlement limit in future.
- 3.26 Relevant plans identifying the opportunity are at Appendix 5.

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 Antrim Construction Company and Dunlop Developments, both long standing North Down based companies focused on the growth and development of the Borough. The companies welcome the opportunity to join the debate on the key issues of strategic significance which will influence future development within the Borough.
- 5.2 The companies' analysis is that Holywood has a very low housing allocation considering the population of the town and a modest uplift is required in order to provide a proportionate level of growth.
- 5.3 Backed by the RDS step change towards housing development within established urban areas, the generally high quality townscape in Holywood has been eroded by the demolition of the existing housing stock and its replacement with more intensive apartment and townhouse developments. The release of some greenfield land, consistent with the RDS small sites approach would provide an alternative location for development.
- 5.4 A very modest increase in the housing allocation to Holywood would also 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.
- 5.5 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.
- 5.6 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.
- 5.7 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 directions set in the Regional Development Strategy (RDS).

5.8 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

Appendix 2: Settlement Analysis of Hollywood

Appendix 3: Review of Evidence Underpinning the Housing Strategy

Appendix 4: Analysis of Sustainability Appraisal

Appendix 5: Site Location Plan

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Hamilton House
3 Joy Street
Belfast
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T 028 9072 3900

Turley

Response ID ANON-UGMZ-GXCX-W

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

Submitted on **2019-08-09 13:45:13**

Respondent Information

1 Name

Name:

Turley (OBO Antrim Construction Company & Dunlop Developments - Ballymenoch Road, Holywood)

2 Address

Please provide preferred contact details, organisation or client address:

Hamilton House

3 Joy Street

Belfast BT2 8LE

3 Telephone Number

Telephone Number:

02890723900

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 detailed 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.

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 prejudge 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.

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

Not Answered

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

please add any additional comment:

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.

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?

Not Answered

Key Issue 7- Urban and Rural Housing

24 Do you agree with the preferred option?

Not Answered

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 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?

Not Answered

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?

Not Answered

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:

Settlement Evaluation

August 2019

Hollywood

Bangor Town			
Settlement Category	Population (2011 Census)	Area (ha)	No. of dwellings (2011 Census)
Medium Town	11,332	TBC	TBC
Overview of Settlement			
<p>Hollywood is located between the Hollywood Hills and the southern shores of Belfast Lough, 8.5km east of Belfast City Centre, 11km west of Bangor and approximately 6km from Belfast City Airport. A distinctive settlement in its own right, it forms part of the Belfast Metropolitan Urban Area and occupies a strategic location with major road and rail links to Belfast. Its proximity, connectivity with and accessibility to Belfast, as well as its coastal location and successful town centre contribute to its attractiveness as a place to live, visit and invest. Hollywood's coastal location, the North Down Coastal Path and the Ulster Folk Museum offer outdoor recreation and act as a tourist draw. There is a provision of parks, playgrounds and open space at various locations within the built up area including Glenlyon Park and Ballymenoch Park. Further services and facilities include a wide range of health, education, retail, commercial leisure, sport and recreation provision. The range of facilities and services immediately available is in some respects perhaps more significant than might be expected given the scale of its population.</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 Kinnegar WWTW. Sewer network modelling has identified wastewater network capacity issues in Kinnegar 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, pharmacies, health centres, day care centres, a leisure complex and multiple sporting facilities, supermarkets, a mix of retail centres, a range of restaurants, tourism projects, police and fire station and recycling centre. In relation to the RDS Settlement Hierarchy and Related Infrastructure Wheel, Hollywood possesses a significant amount of the resources and facilities which are found at Level 3 (Regional Towns) but the scale of population is more reflective of a medium town having regard to the NISRA Classification of Settlements.</p>		
Environmental Capacity Test	<p>Hollywood is located between the Hollywood Hills and the southern shores of the Belfast Lough 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. There are 7 Local Landscape Policy Areas (LLPAs)(HD11-HD17) including Ballymenoch, Folk Park, Glenlyon, Marino/Cultra, Maryfield, Redburn and Seapark. There are 6 sites of</p>		

	Local Nature Conservation Importance (SLNCI) (HD10/01-HD10/06) within the settlement limits of Holywood including Ballymeoch Park, Croft Brun and Ulster Folk and Transport Museum and Cultra Glen. The Holywood Hills are designated as Landscape Character Area 102. The Craigtantlet Escarpment Area of High Scenic Value borders the south-west limits of the settlement of Holywood.
Transport Test	Holywood is strategically located on the Regional Strategic Transport Network, benefitting from access to Belfast and Bangor via the A2 Sydenham/Holywood By-Pass. A train line serves the settlement, providing regular journeys Monday-Sunday to and from Bangor and Belfast, and connecting to the Dublin rail line and all other NIR lines. Three train halts are present within the settlement, located at Holywood train station, Marino and Cultra. Additionally, Holywood has a regular direct bus service to Belfast, as well as several buses serving the town itself. The A2 By-Pass experiences congestion at peak commuting hours and continues to be planned for upgrade. The settlement provides good opportunity for walking and cycling with the North Down Coastal Path although this could be better connected to traffic free routes continuing into Belfast. Holywood is located 6km from Belfast City Airport, 30km from Belfast International Airport and 14.5km from Belfast Stenaline terminal.
Economic Development Test	Holywood Exchange retail park is located to the south-west of the Holywood settlement limit and provides numerous large retail units including Sainsbury's, B&Q and Ikea. Located across the A2 is a 24-hour Tesco Extra. The linear High Street and surrounding area within the town centre also offers a range of smaller retail locations providing for the everyday needs of the local population. Together these centres play an important role in providing shoppers with convenience and non-bulky comparison goods. While Holywood has no specific zoning for Industry/Employment, the strength of the town centre from an employment perspective is clear from the paper on Town Centres and Retailing insofar as within Holywood, financial, professional and other service uses falling within Class A2 of the Use Classes Order comprise some 17% of the total non-residential units within the town centre. Other B1 office uses comprise a further 6% giving a total of 23% for office based uses within Holywood. This exceeds the offering in Bangor and Newtownards at 14% and 16% respectively and is a reflection of the town's proximity to Belfast and strategic accessibility.
Urban and Rural Character Test	Holywood is located between the Holywood Hills and southern shores of Belfast Lough. The settlement forms a gateway to the Ards and North Down Borough and consists of a coastal corridor of commuter development concentrated around an attractive commercial town centre. Following the introduction of the railway in 1865, Holywood experienced significant growth with high quality residential suburbs being developed on the lower slopes of the Holywood Hills to the east of the town. Today Holywood functions as a local commercial centre and commuter town. Holywood contains a number of land uses including residential with retail, commercial and ecclesiastical uses located in the larger older properties in the Town Centre. Holywood possesses a rich built heritage with much variety in significant townscape characteristics. A mix of Medieval, Victorian and Edwardian architecture, a well preserved historic street pattern and a unique landscape setting. In terms of urban form, the following areas can be identified in the town: -

	<ul style="list-style-type: none"> • High Street/Shore Road which contains the original structure of the town, characterised by a fine grain of development with buildings generally 2-3 storeys in height; • Priory/Victoria Road/Croft Road comprises the oldest part of the town, characterised by 19th Century dwellings, historic landmark buildings, meandering streets, distinct topography and views to the sea; • Church Road/Demesne Road with much of the 19th Century built form remaining, characterised by steep gradients of the streets and landscape setting; and • My Lady's Mile/Demesne which comprises fine examples of historical 19th Century suburban dwellings in a strong landscape setting. <p>Within Holywood there are 5 areas of high quality townscape designated as Areas of Townscape Character – North, South, Kinnegar, Cultra/Marino/Craigavad and Bangor Road – reflecting the concentration of high quality townscapes.</p>
Community Services Test	<p>Holywood 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 primary shopping core there is a vibrant mix of comparison retail uses with a number of substantial independent businesses. Primary frontage for comparison goods retailing is along the linear High Street. Holywood Exchange Retail Park, located beyond the south-west of the settlement limit, together with the smaller retail units located within the Town Centre are significant influences upon the commercial character of the town. Holywood is served by a nursery, primary, secondary and Rudolf Steiner school. The town also has numerous care homes and folds, a leisure complex, library, a GP surgery, clinic, churches encompassing all of the main religious denominations, church halls and community centres. Various sporting clubs are located in the town, including Holywood Golf Club and Seapark Recreation Grounds which houses a bowling green, tennis courts, play park and pavilion, recently modernised and renovated.</p>
Qualitative Analysis	
Strengths	<ul style="list-style-type: none"> • High quality landscape setting. • Excellent connection to the strategic transport network via major roads (A2 Belfast Road), train line and bus services. • Located in close proximity to Belfast Metropolitan Area and George Best Belfast City Airport. • The settlement is an attractive place to live, with its coastal setting, popular town centre and proximity to Belfast. • It has valuable open space and recreation provision in terms of parks, North Down Coastal Path, the Ulster Fold Museum and leisure complex. • A wide range of employment opportunities exist within the settlement, particularly within the town centre. • Holywood Exchange Retail Park and the vibrant High Street offer a significant retail resource for the population of the settlement and beyond.

Weaknesses	<ul style="list-style-type: none"> • Severance effect of A2 which reduces connectivity to railway station and part of the coastline. • Quality of cycle connection to Belfast.
Opportunities	<ul style="list-style-type: none"> • Potential to provide additional Park and Ride facilities. • Potential to further enhance the strong base of town centre employment uses, maximising the strategic location of settlement.
Constraints	<ul style="list-style-type: none"> • Opportunity for outward development constrained by Belfast Lough to the north, Redburn Country Park/Knocknagoney Gap and landscape designations to parts of the Belfast/Craigantlet Hills. • Need to protect high quality townscapes.

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.

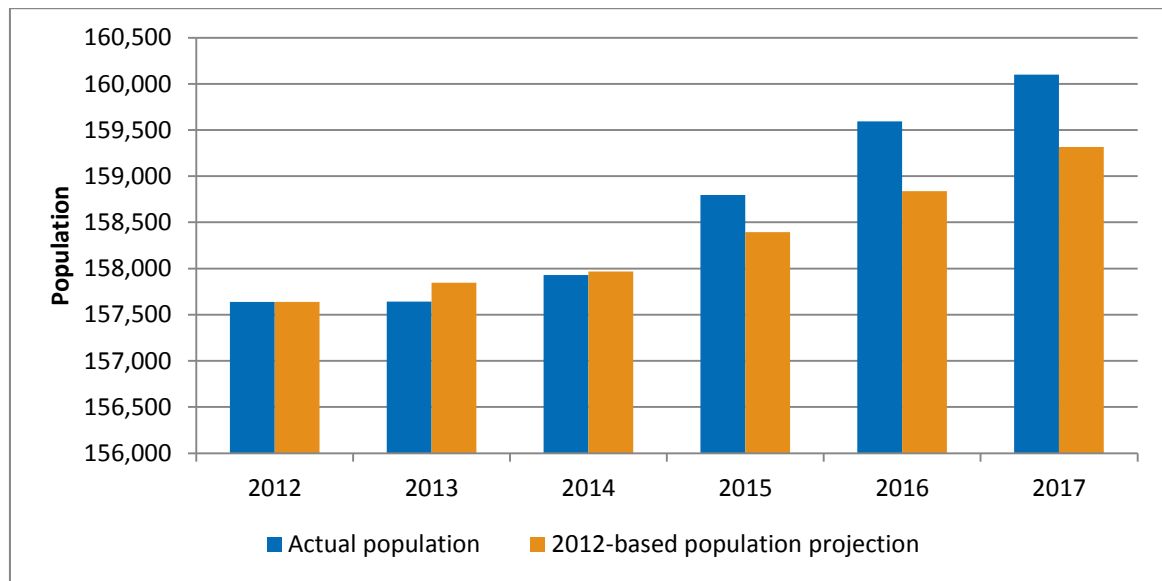
⁹ *Ibid*, p66

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

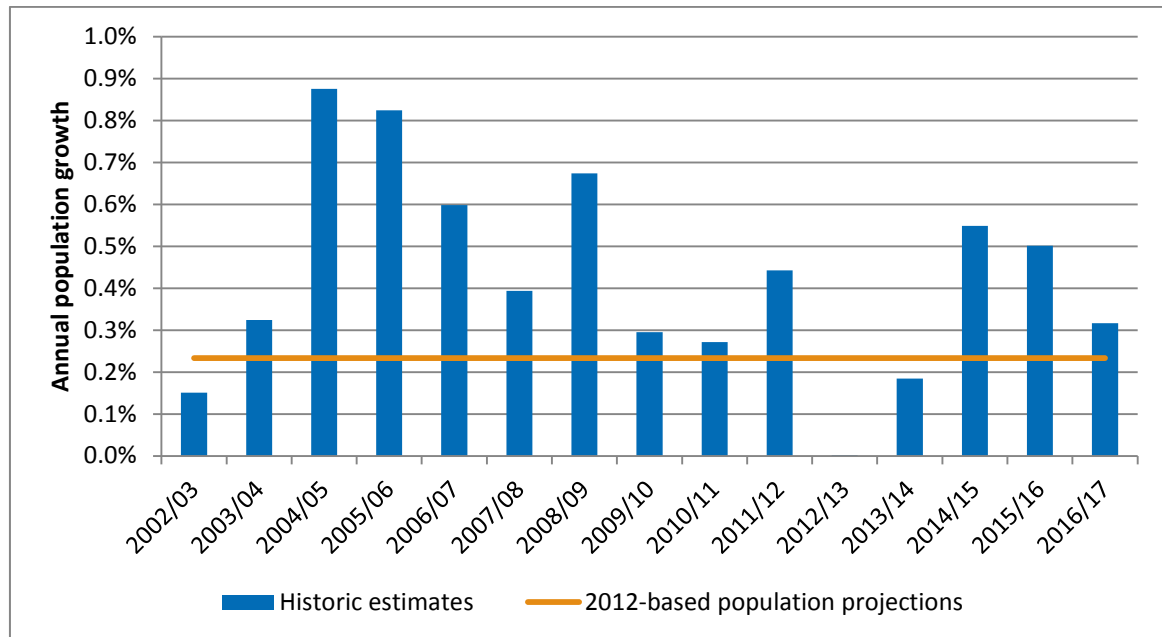
Figure 1: Actual Population Growth vs 2012-based Population Projections in Ards and North Down, 2012-2017



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



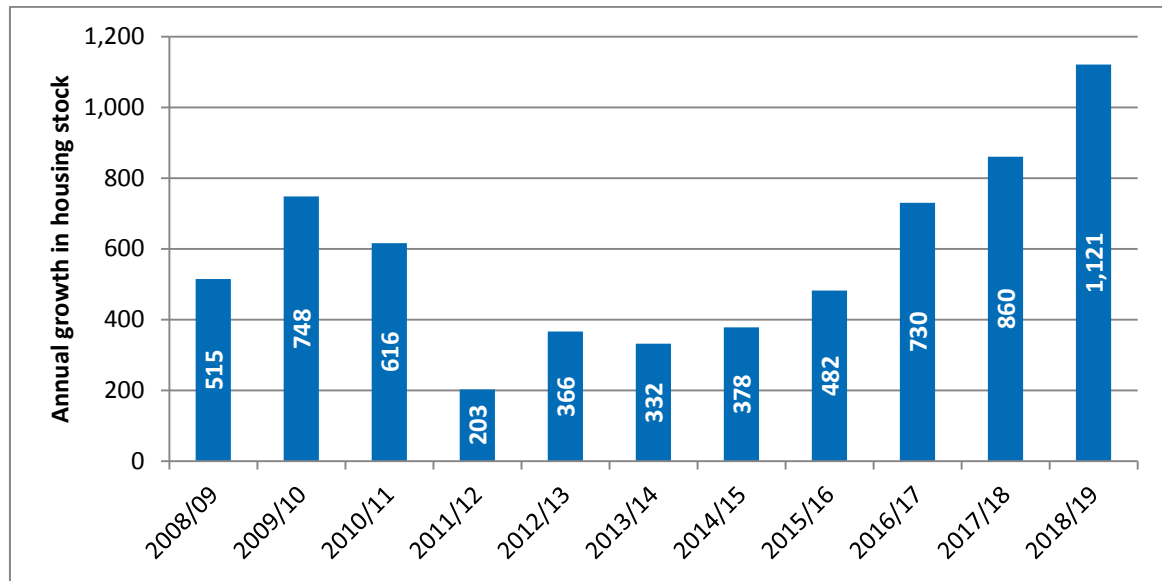
Source: NISRA

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.

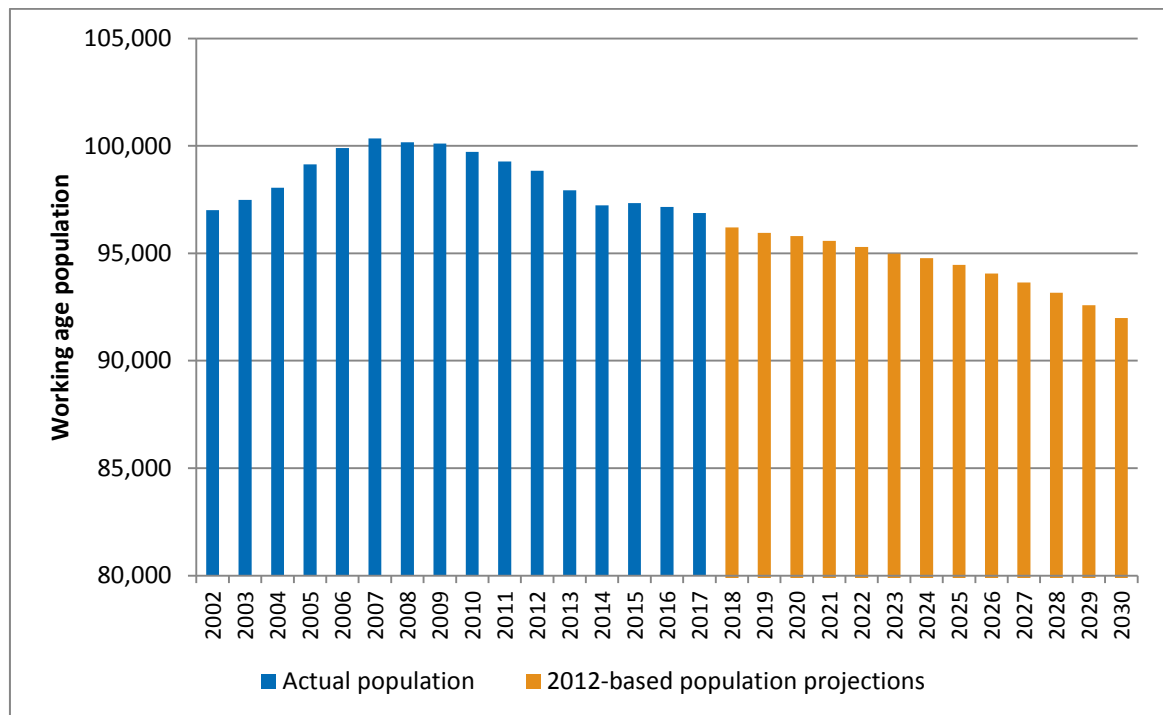
26. Notwithstanding, the Integrated Strategy describes how:

“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.

DUNB3006

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

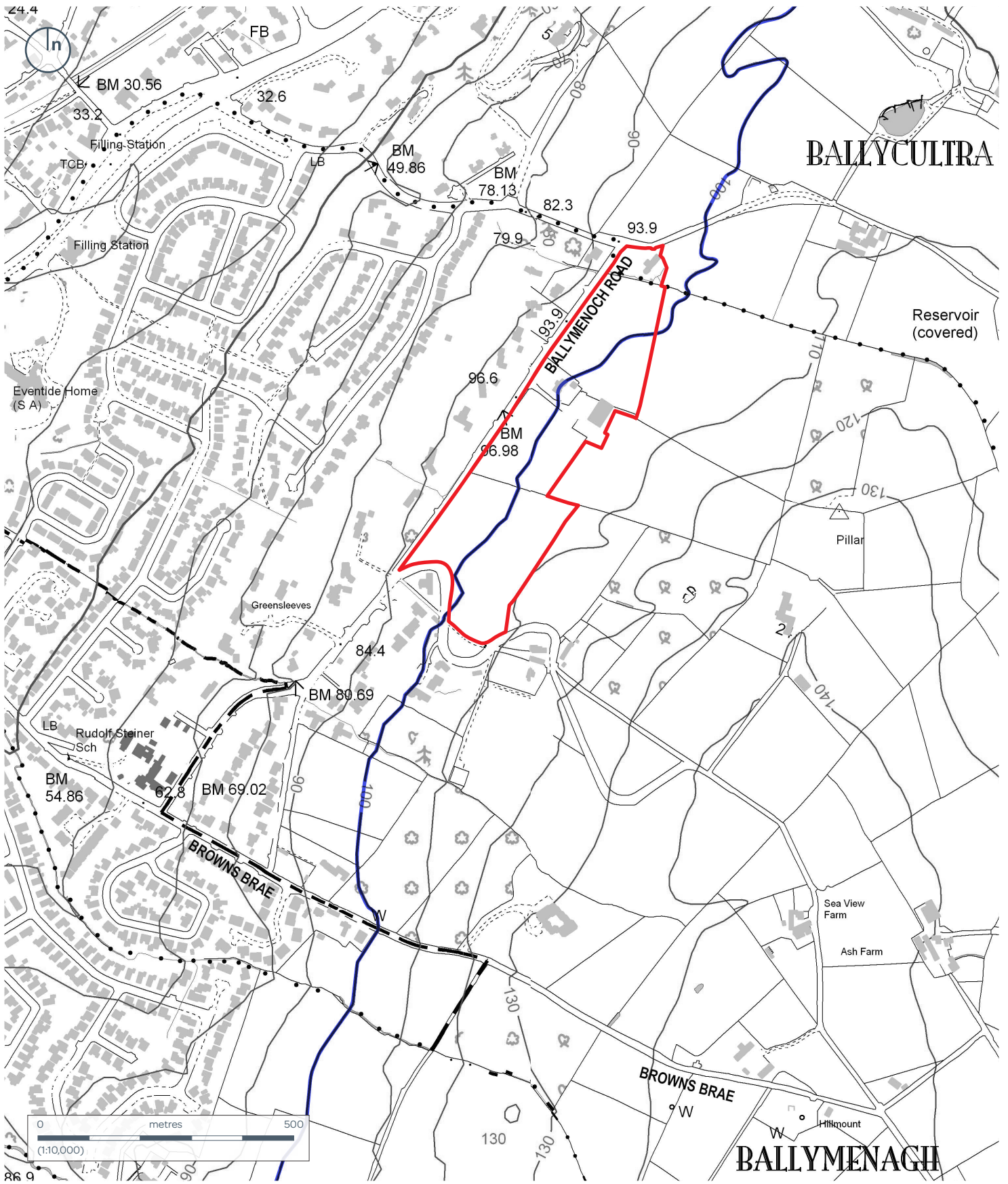
- 1.25 At present, the non-technical summary provided at the front of the Interim SA report falls significantly short of meeting the requirement 10 of Schedule 2 within the EAPP Regulations which must include the following:
- i. An outline of the contents and main objectives of the plan or programme, 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.



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- Site
- 100m contour

CLIENT

Antrim Construction Company / Dunlop Developments

PROJECT

Ballymenoch Road, Hollywood

DRAWING:

Site Location with 100m contour

PROJECT NO.

ANTB3003

DRAWING NO.

1001

REVISION

00

STATUS

Preliminary

SCALE

1:10,000 @ A4

DATE

August 2019

CHECKED BY

SF



Appendix 2: ANDBC Hollywood Data Hub Brochure

From Holywood to Hollywood!



Creative and Digital Technology is a growth sector with a highly skilled local workforce driving the NI economy. Ards and North Down is the location of choice for a concentration of leading innovators that provide specialist services to the global screen and digital industries forging a strong link from Holywood to Hollywood... and beyond.



concept design



Super-fast data transfer is critical for technology business and AND has a USP in this respect - OFCOM reports the Borough has the highest percentage of premises connected with full fibre in NI.

The proposed hub will be specifically designed to address the accommodation, security and power needs of entrepreneurs starting out in the screen industries as well as established organisations. It will provide a platform for networking, collaboration, and the development of emerging technology sectors.

DIGITAL SECTOR IN NI

The digital sector in Northern Ireland consists of around 1,700 companies and 20,000 workers and it is growing. In 2018, it had a GVA of £1.2 billion representing 3% of all economic output.

The screen industries' application of technology is flourishing. Movie and screen productions filmed locally pumped £330million into the region's economy between 2018 and 2022, and Northern Ireland Screen* has set a strategic target to increase that to £430 million by 2026. With state-of-the-art facilities such as Titanic Studios (one of Europe's largest film media campuses) and Studio Ulster (set to be a global leader in virtual production) the infrastructure is there and developing to support exponential growth. Numerous local companies provide specialist services to globally renowned clients including the BBC, HBO, Discovery Channel, Playtone, Paramount, and Universal.

ARDS AND NORTH DOWN - GREAT LOCATION

Ards and North Down (AND) is ideally situated to develop and encourage innovation in this sector. Adjacent to Belfast and minutes from Titanic Studios and the Studio Ulster site, it is the chosen location for a concentration of screen industry tech experts. In 2022-2023, 50% of Northern Ireland Screen's "Screen Fund Production" (Animation/Children category) were awarded to projects based in AND. Just 3.2km from George Best City Airport and boasting a strong road network and public transport links; it is the perfectly positioned for international business. The local talent pool is significant with 38% educated to higher levels (NVQ 4+), well above the national average of 34.9%.

HOLLYWOOD - CONCENTRATION OF DIGITAL TECH INNOVATORS IN THIS THRIVING TOWN

At the heart of this creative corridor between Belfast and Bangor, is the vibrant town of Holywood. It is home to innovators in production, post-production, game development and digital animation including key players such as Flickerpix, Italicpig, Paper Owl Films, Waddell Media, and Yellowmoon. These locally grown businesses work with the big global studios and have played a vital role in the growth of NI's screen sector working with clients including HBO, National Geographic, the Discovery Channel, and Channel 4 to name a few.

Hollywood was named as the 'Best Place to Live in Northern Ireland' by The Sunday Times in 2021, primarily due to its strong transport links, unique shops, café culture, vibrant community, and proximity to the sea. Our local digital companies are embracing and benefitting from this in terms of promoting work / life balance, which helps retain their skilled local workforce.

CREATIVE INNOVATION HUB

Ards and North Down Borough Council recognises creative and digital as a key growth sector and has identified a need for flexible workspaces, as well as high demand for quality space and bespoke facilities, to support this. The Council is actively pursuing capital funding through the Belfast Region City Deal (BRCD)**, aligning to the Innovation and Digital Pillar, for the development of a Creative Innovation Hub in Holywood, and has pledged a significant level of aligned investment.

COLLABORATION OPPORTUNITIES - HARNESSING FUTURE GROWTH, DEVELOPING TALENT

The Council will seek collaboration opportunities with industry partners including Titanic Studios and Studio Ulster to align with 3D digital asset developers and freelancers based at the Hub. The project will also facilitate creative tech skills development by leveraging Council's existing strong links with educational partners such as South Eastern Regional College.

With the project at an embryonic stage, the Council is seeking to develop a long-term partnership with the right operator who would input into the specification to create and operate the facility. Recent market testing of the project to inform the Outline Business Case has demonstrated high level of support from industry experts and leaders in the sector.

Could you partner with us or are you interested in finding out more about this exciting new opportunity? Get in touch via email:- signaladmin@ardsandnorthdown.gov.uk or call 0300 013 3333.

Ards and North Down Borough Council offers a broad range of business training and funding opportunities to help businesses realise their digital transformation ambitions. The dedicated business support team is ready to work with investors and can deliver a range of digital innovation, growth, skills, and employability schemes, and provide links to key partners and Government agencies.

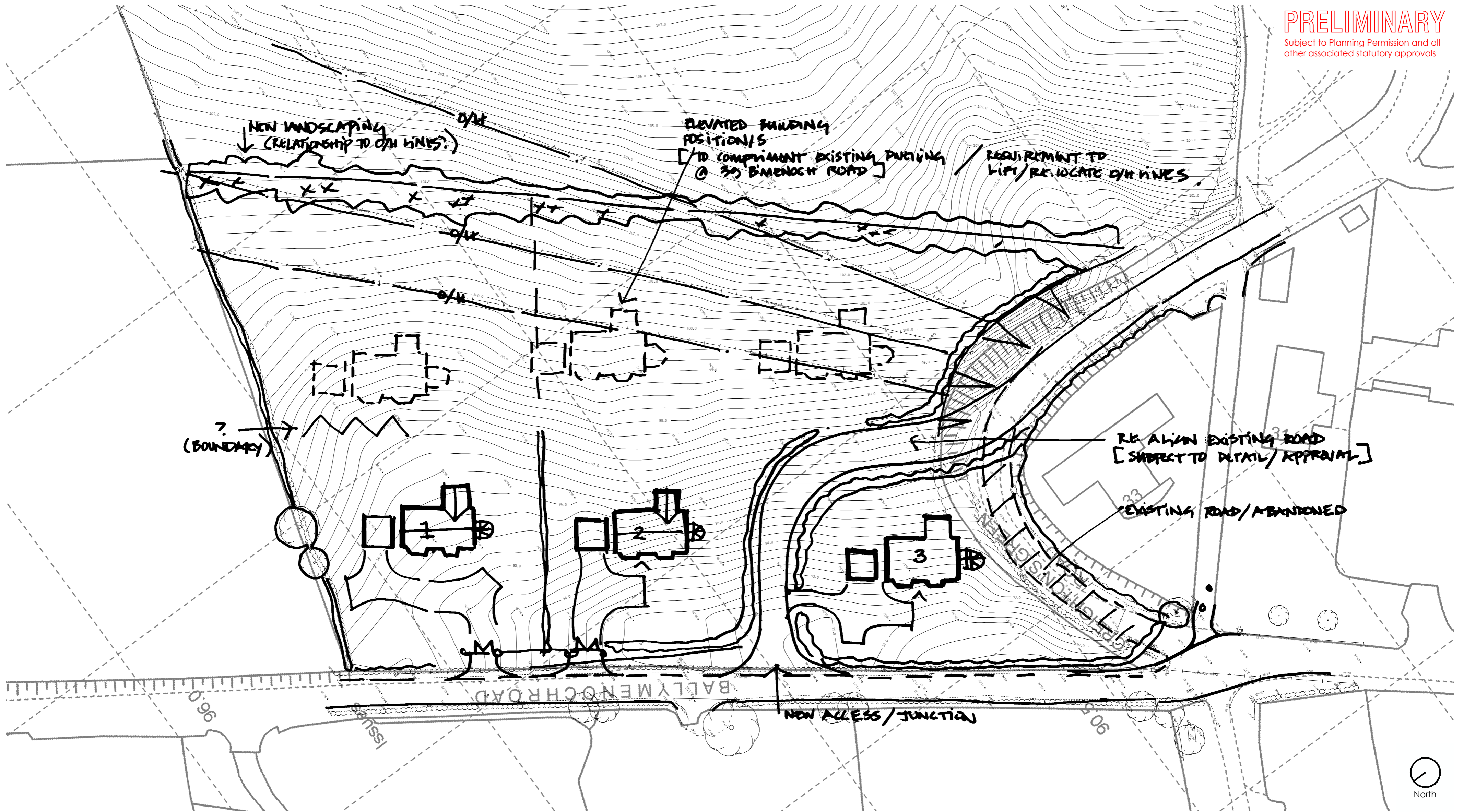
Find out more at www.ANDBusiness.co.uk

* Northern Ireland Screen - The national screen agency for Northern Ireland.

**Belfast Region City Deal (BRCD) is a bespoke package of funding and decision-making powers agreed between UK central government and local regions; aimed at helping to harness additional investment, create new jobs and accelerate inclusive economic growth.

Appendix 3: Concept Plan

PRELIMINARY
Subject to Planning Permission and all other associated statutory approvals



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