

**MAIN QUESTION**

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+ ADD TO ANALYSIS

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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):**

Northland Developments Ltd

+ 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

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+ ADD TO ANALYSIS

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

No answer

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+ ADD TO ANALYSIS

**draft Habitats Regulations Assessment(HRA)**

No answer

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+ ADD TO ANALYSIS

**Equality Impact Screening Report**

No answer

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+ ADD TO ANALYSIS

**Rural Needs Impact Assessment**

No answer

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+ ADD TO ANALYSIS

**Please add any additional comments**

No answer

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Example tag 1 +

Example tag 2 +

# **Ards & North Down draft Plan Strategy**

Representation on behalf of Northland Developments Ltd

**Newtownards**

March 2026

**Turley**

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**Client**

Northland Developments Ltd

**Our reference**

04603

13 March 2026

# Executive Summary

## *Representation on behalf of Northland Developments Ltd – Ards & North Down draft Plan Strategy*

1. This submission, prepared by Turley on behalf of Northland Developments Ltd is submitted in response to the Ards & North Down Borough Council’s draft Plan Strategy (dPS). Northland Developments Ltd is established, Bangor-based house builder with a deep-rooted interest in the sustainable growth and development of the Borough. 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. **Reliance on Unreliable Housing Sites:** The Council’s continued dependence on long-standing, smaller, and often unreliable housing sites is questioned. The submission provides a detailed review of the housing land supply and recommends identifying additional, clearly developable, ‘new’ land to support the Council’s employment-led growth strategy.
6. **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.
7. **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.
8. **Inadequate Response to Regional Context:** The dPS is criticised for insufficiently addressing the Regional Development Strategy’s requirement for a coherent Belfast Metropolitan Area (BMA) approach and for not adequately considering Belfast’s housing delivery shortfall and the complementary roles of Bangor and Newtownards.

#### **Soundness Issues Identified**

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

#### **Consistency Tests:**

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

#### **Coherence and Effectiveness Tests:**

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

#### **Detailed Policy Commentary**

15. **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.

16. **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.
17. **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.
18. **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**

19. 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.
20. 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.
21. Direct additional housing land to principal settlements to align with planned employment growth and address identified supply shortfalls.
22. Clarify and, where appropriate, streamline general and topic-specific policies to provide certainty for applicants, decision-makers, and stakeholders.
23. Ensure monitoring and review mechanisms are robust but not a substitute for sound plan-making at the outset.

#### **Conclusion**

24. This representation welcomes the Council's ambition and integrated approach but urges significant amendments to ensure the draft Plan Strategy is found sound. The principal recommendations focus on extending the plan period, addressing housing delivery shortfalls, and avoiding unnecessary phasing mechanisms. By adopting these changes, the Council can better secure the Borough's sustainable growth objectives, support economic development, and provide for the housing needs of current and future residents.

25. 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 Northland Developments Ltd, and welcomes the opportunity to return comments on the Ards & North Down Borough Council draft Plan Strategy (dPS).
- 1.2 In operation since 1995, Northland Developments have been building quality homes in the North Down Area for over twenty years having established well known developments such as Ardvanagh, The Hastings, Stonebridge Village, Bridgelea, Tullynagardy and Woodgate, to name but a few.
- 1.3 Their most recent and ongoing developments, Claremont at River Hill and The Green at Bridgelea, offer the same high standards as their previous developments catering for all needs from the first time buyer to the larger detached family homes.
- 1.4 Their commitment to high standards and excellent customer care is reflected in the numerous quality awards won over the years from both CEF and NHBC, further reflected in NHBC Pride in the Job Awards for the last 15 years in succession.
- 1.5 As a generational business rooted in its local community, the company has 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.
- 1.6 The company is 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.
- 1.7 The company welcomes this opportunity to respond to the Council's invitation to join the debate on the key issues of strategic significance which are likely to influence the direction of future development within the Borough.
- 1.8 The structure of the submission is as follows:
  - **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests;
  - **Chapter 3:** Details our representation to the dPS Context and Vision (Part A);
  - **Chapter 4:** Details our representations to the dPS Strategic Approach – Growth Strategy (Part B);

- **Chapter 5:** Details our representations to the dPS General Policies applying to all development (Part C);
- **Chapter 6:** Details our representations to the dPS Strategic and Operational Topic Policies (Part D);
- **Chapter 7:** Details our representations to the dPS proposals for Monitoring and Review (Part E);
- **Chapter 8:** Sets out our analysis of how growth can be accommodated in Newtownards.

1.9 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, its 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 Northland Developments welcome the acknowledgement at para 1.116 that some of these issues require collaborative approaches and commitments to address. The company 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	36
Antrim & Newtownabbey	March 2027	20
Mid & East Antrim	March 2027	42
Derry City & Strabane	July 2027	24
Lisburn & Castlereagh	September 2027	48

- 3.11 Even if it takes the 15 months from adoption of the Plan Strategy, as presently forecast by the Council, this will see the draft LPP published in May 2031. The Council’s timetable suggests a three-year period from then to adoption of the LPP, which would be May 2034. This would be quicker than any other Council before it. Even with the potential for Independent Examination by either the Planning Appeals Commission or an alternative person appointed by the Department, it appears optimistic. 2035 is perhaps more realistic but time will tell.
- 3.12 The clear potential for the second part of the Plan to be adopted two or three years after its stated end date, must have consequences for its outlook and housing strategy. In order to deliver some benefit from the significant investment in plan-making and avoid the potential for the plan to be out of date before it is even adopted, it should look ahead to at least 2035, if not 2040.
- 3.13 As presently drafted the dPS fails several of the Consistency, Coherence and Effectiveness soundness tests:

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

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

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

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

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

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

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

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

## 4. Part B – Strategic Approach – Growth Strategy

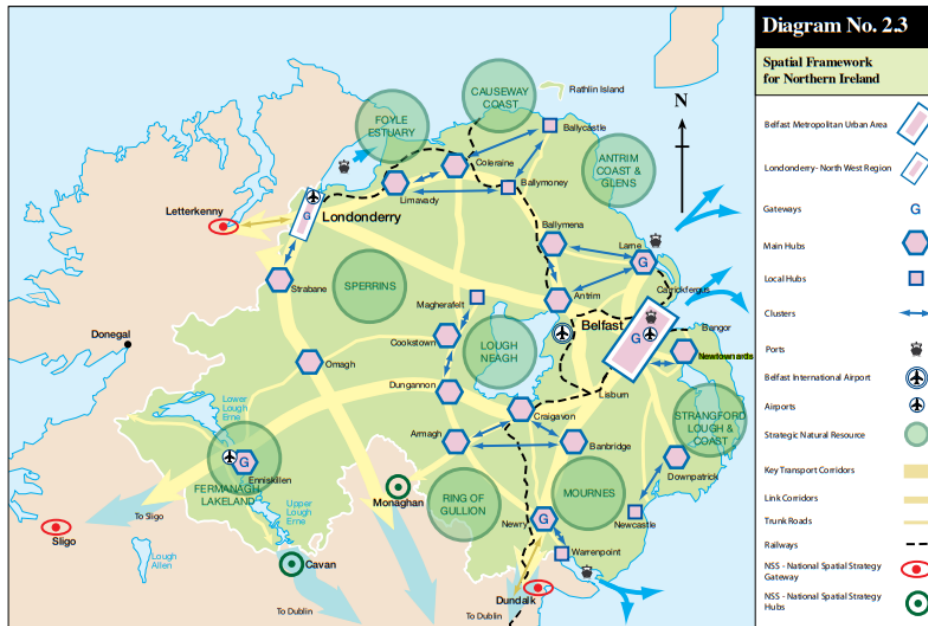
### SGS 1: Spatial Growth Strategy & SGS 2: Settlement Hierarchy

- 4.1 In our POP response we reminded the Council of the importance of continuing to acknowledge that Newtownards also has a Belfast Metropolitan Urban Area (BMUA) function, with the RDS clearly identifying it as a main hub at para 3.86:

*3.86 Newtownards is a market town and the main town in Ards District Council with a population of around 28,500. It is a key commuter town to Belfast and due to its proximity and accessibility to the city plays a growing role in the functioning of the Belfast Metropolitan Urban Area by attracting commuters, tourists and businesses and as such has the potential to cluster with BMUA. The Ards Borough is a mixture of the rural and the urban, and given the area's scenic beauty and historical interest, tourism is a significant and growing part of the local economy. While traditional industries have declined dramatically, Ards is establishing a diverse economy, particularly in the added value food and engineering sectors. Newtownards, the Borough's capital town, has a long established reputation as a prime retail destination, with a vibrant mix of high street and independent shops.*

- 4.1 We welcome the acknowledgement in paragraph 10.9 of the dPS of the potential for Newtownards to cluster with the BMA. This is framed in the context of economic development, but it is important to note, as above, the complementary role the town plays to Bangor and the rest of the BMA in attracting commuters, or residents. As an attractive place to both live and work, it can play an important role in the overall growth strategy of the Council to achieve its vision for the Borough.
- 4.2 Considering Newtownards in its wider context, in RDS terms, it is the fourth largest Main Hub and the closest to the BMA:

**Figure 4.1: RDS Spatial Framework for NI**



4.3 Whilst Table 8 in Appendix 3 of Technical Supplement 1 confirms that Bangor is over twice as large as Newtownards, in the context of the larger settlements in Northern Ireland, Newtownards is the 10<sup>th</sup> largest settlement in Northern Ireland.

**Table 4.1: Census 2021 person and household estimates for settlements**

Settlement	Population	Households
Belfast City	291,386	126,925
Derry City	84,884	35,554
Craigavon Urban Area	72,721	29,331
Metropolitan Newtownabbey	67,112	28,410
Bangor	64,122	27,859
Metropolitan Castlereagh	59,198	25,467
Lisburn City	51,447	21,321
Metropolitan Lisburn	32,368	12,696
Ballymena	31,308	13,287
<b>Newtownards</b>	<b>29,591</b>	<b>12,984</b>
Newry	28,026	11,065

Carrickfergus	27,886	12,132
Antrim	25,464	10,766
Coleraine	24,560	10,622
Omagh Town	20,353	8,721
Larne	18,794	8,624

Source: NISRA CT0046: Person and household estimates for settlements

- 4.4 As an important settlement with a complementary role to both Bangor and the wider BMA, it is important to ensure its potential contribution to achieving the Council’s vision and success scenario is maximised. Even if Bangor is of a larger scale and forms part of the higher order BMA settlement, this should not result in a dilution or diminution of the growth potential of Newtownards.

### **SGS 3: Strategic Allocation of Economic and Industrial Land**

- 4.5 Given the important connection between the delivery of jobs and homes, we would support this policy.
- 4.6 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.’<sup>1</sup>*
- 4.7 It is also observed that the dPS acknowledges the challenges relating to worsening affordability, observing: *‘House prices in the Borough remain relatively high, and this can cause affordability issues, particularly for young people.’<sup>2</sup>* 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.

<sup>1</sup> Ards and North Down Local Development Strategy (2025), paragraphs 2.45 and 2.46

<sup>2</sup> Ards and North Down Local Development Strategy (2025), paragraph 1.115

## Alignment between job growth and housing need

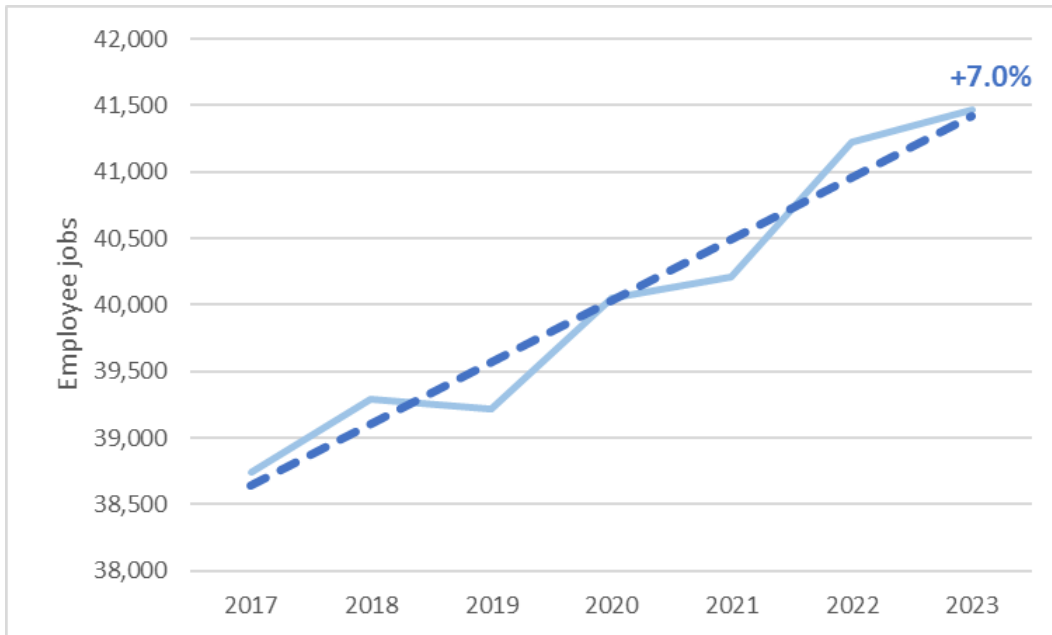
### *Planning positively for economic growth*

- 4.8 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).
- 4.9 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.
- 4.10 The additional need reflects work undertaken to ensure alignment with the Council’s *Integrated Tourism, Regeneration and Economic Development Strategy (Integrated Strategy or ITRDS)*, which sets out the growth aspirations for the Borough up until 2026. The anticipated growth rates have been extrapolated to 2030 and then 2032 to align with the Plan period. In the case of the more ambitious ‘strategy success’ scenario this suggests job growth over the plan period of some 9,375 jobs, which is preferred and to which the Plan aligns. It is noted that the job growth figures to 2030, which are used in the ELR, suggest 4,500 jobs under the baseline and 7,500 jobs under the ‘strategy success’ scenario, translating into a need for between 12.6 and 20.5 ha of employment land. It is evident that in allocating an additional 25 ha, on top of the remaining land supply, that the Plan provides the potential to accommodate stronger job growth than either of these referenced scenarios if investment occurs and commercial floorspace is progressed across the whole potential supply.
- 4.11 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*’<sup>3</sup>.
- 4.12 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.

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<sup>3</sup> Ards and North Down Local Development Strategy (2025), paragraphs 1.84 and 1.85

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



*Source: NI Business Register and Employment Survey*

- 4.13 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.
- 4.14 The study identified a sufficient pipeline of potential employment generating projects. Indeed, it identified, based on 20 ‘direct interventions’ along with calculated indirect growth arising from a number of these interventions, the potential to generate 10,395 full-time equivalent (FTE) jobs. A 10% displacement factor was applied to net this down to align with the total forecast of 9,375 to validate the assumed level of growth.

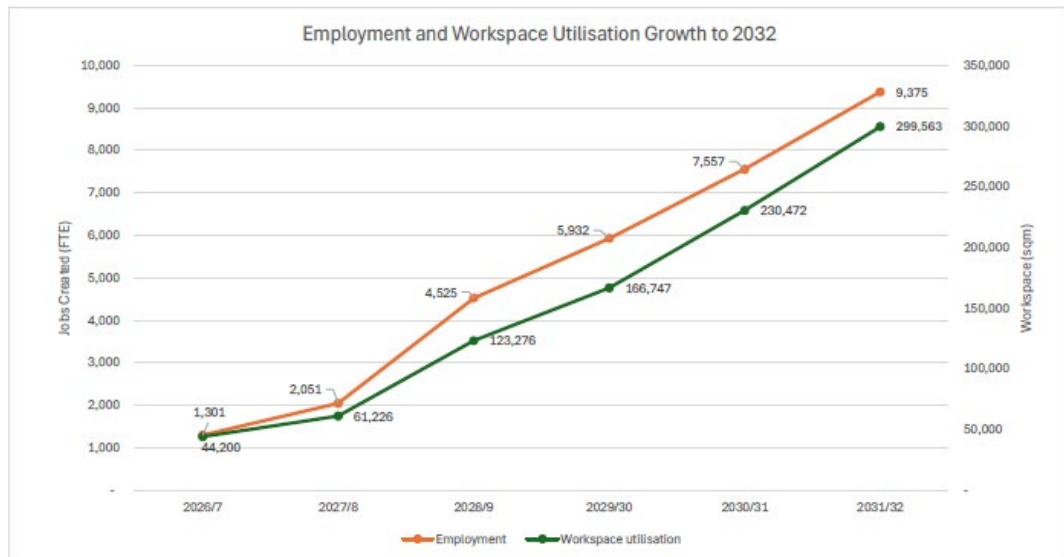
***The potential for higher than forecast employment growth***

- 4.15 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.
- 4.16 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...).

- 4.17 The study suggests that the additional jobs forecast could be accommodated within 40.8 ha of employment land. Even against the 63 ha of extant employment land referenced above this suggests a reasonable level of headroom. If this additional land was built out and occupied this itself would contribute further additional jobs.
- 4.18 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

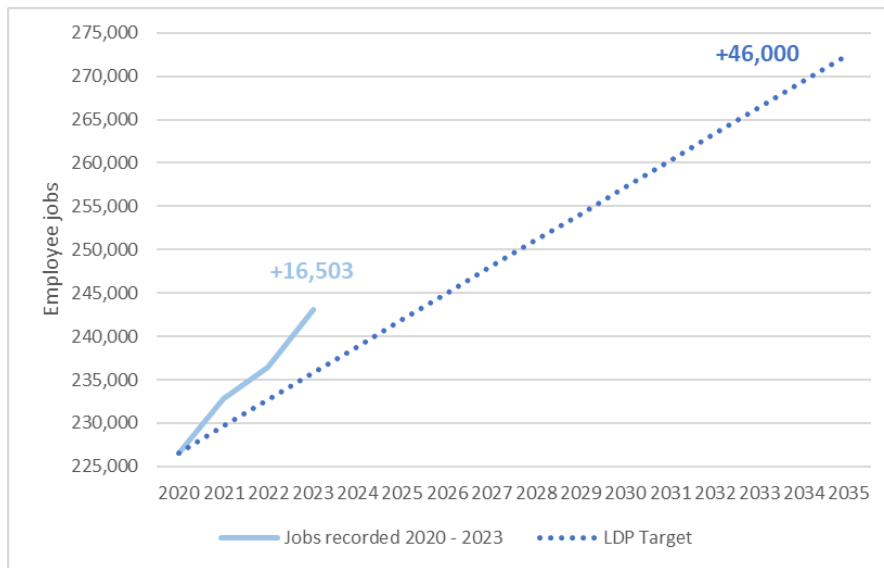
### ***Understanding the implications for housing need***

- 4.19 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'*.
- 4.20 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.
- 4.21 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***

- 4.22 As referenced above the dPS acknowledges the important relationships between Ards and North Down and Belfast, including the planned investment across the Belfast Region.
- 4.23 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*

- 4.24 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.
- 4.25 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.
- 4.26 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 modelling<sup>4</sup>.
- 4.27 It is important that the Council provides adequate consideration of this issue as the additional labour-market pressures, if sustained, would generate further

<sup>4</sup> 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.

housing need pressures alongside those generated by the borough's own growing economy.

- 4.28 As presently drafted the dPS fails soundness test C4 because the Council has had insufficient regard to how Belfast's Local Development Plan is falling behind in its delivery of homes and the opportunity to maximise the complementary role of Bangor and Newtownards within the wider BMA.

#### **The need for an extended Plan period**

- 4.29 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.
- 4.30 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.
- 4.31 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 delivered<sup>5</sup>. 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.
- 4.32 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.
- 4.33 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.

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

4.34 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**

4.35 The approach proposed through the *Spatial Growth Strategy (SGS 1)* is broadly supported and specifically the intent to: *‘Focus growth in Bangor and Newtownards as the principal settlements of the Borough, strengthening their roles as the primary locations for future housing and economic growth and investment in the Borough.’*<sup>6</sup>

4.36 Map 3 of the Draft Plan confirms that the vast majority of strategic employment land allocations are concentrated within the two main settlements of Bangor and Newtownards. Table 1 shows the distribution of the proposed employment land allocations. This identifies that of the remaining developable land this is broadly split between the two settlements, with a slight orientation towards Bangor.

**Table 4.2: Strategic Employment Allocations**

Site Name	Location	Total Area Zoned (ha)	Total Area Remaining (ha)
<b>Strategic Employment Locations</b>			
Balloo Industrial Estate	Bangor	55.22	4.67
Jubilee Industrial Estate	Newtownards	23.3	3.61
<b>Legacy Zoned Employment Sites</b>			
Newtownards Road	Bangor	17	17
Balloo Road / Newtownards Road	Bangor	28.07	12.15
Clandeboyne Rod	Bangor	1.22	0.23
Bangor Road	Newtownards	5.87	5.87
Comber Road (West)	Newtownards	4.51	4.51
Comber Road (East)	Newtownards	8.19	7.21

<sup>6</sup> Ards and North Down Local Development Strategy (2025), Policy SGS 1

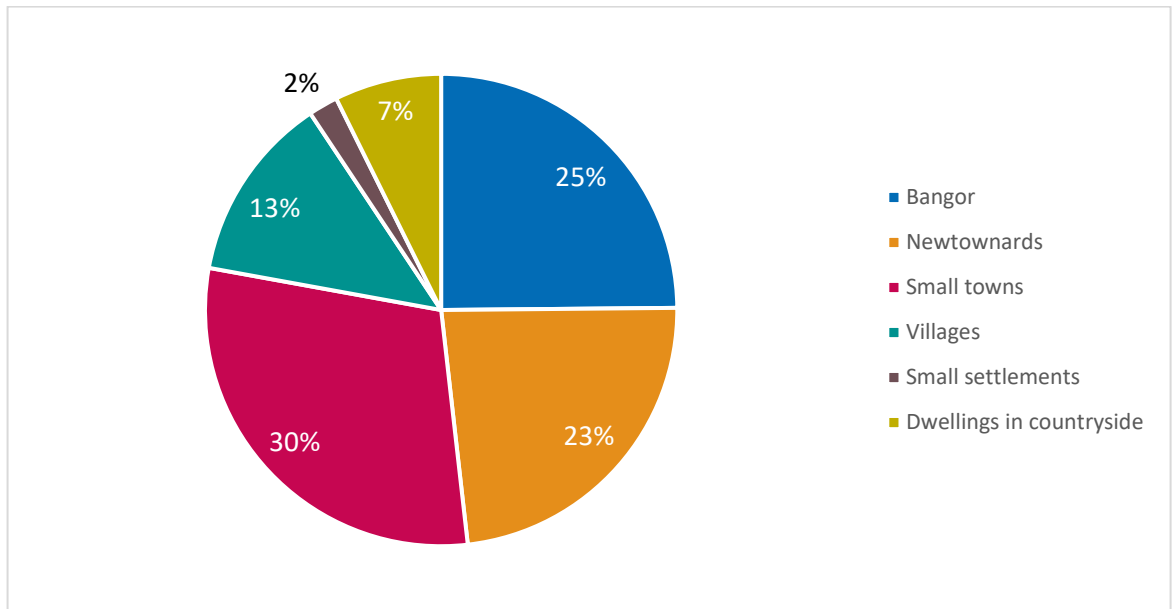
Donaghadee Road (North and South)	Newtownards	5.04	3.42
South of Belfast Road and East of Milecross Road	Newtownards	2.97	2.97
Comber Road Industrial Estate	Newtownards	10.3	0.18
Donaghadee Road	Newtownards	4.05	0.86
Riverside, Lands south of Comber Bypass	Comber	4.66	0
<b>Total</b>		<b>170.4</b>	<b>62.68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

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

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

suggests that the policy expectation of 63% has not been achieved, with 48% or just under half of the total delivered in the two settlements to date. It is noted that the 'small towns' have in contrast seen a disproportionate level of development, representing 30% of total completions over this period.

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



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

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

#### **SGS 4: Strategic Housing Allocation (SHA)**

- 4.40 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 4.3: Extrapolated Strategic Housing Allocation (SHA)**

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

- 4.43 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. The process of developing a residential site involves several stages from site purchase through design, planning, and construction. It is complex and significant investment is required before new homes are available.

**SGS 5: Strategic Housing Allocation across settlements**

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

**Table 4.4: Extended Strategic Housing Allocation (SHA)**

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

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

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

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

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

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

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

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

- 4.49 This suggests that, again always presuming all sources of identified supply are available and making a housing contribution, by 2035 land supply might be expected to run out in Newtownards around then.
- 4.50 In reality, we would not expect all sources of identified supply to be available and make a housing contribution. Using the Council's 2023/24 Housing Monitor, we have undertaken a review of the position in respect of existing housing commitments, urban capacity sites and development opportunity sites in Newtownards (Appendix 3). This review has involved reviewing the planning history and visiting each of the identified sites. This review has identified some anomalies in the data which are likely to reduce the overall assessment of potential yield.
- 4.51 More importantly, we have gone a step further and, making some assumptions, sought to create a trajectory of housing delivery over the next seven years to the end of the plan period (Appendix 4). Without the benefit of, in particular, information on the NIW position in relation to each of the sites, it is an estimate or projection of the future. It is, however, granular in nature and intended to facilitate analysis of the pipeline of housing delivery in the town at a site level.
- 4.52 The annual housing requirement in Newtownards, from the beginning of the plan period in 2017, is 421 homes, calculated as follows:

**Table 4.7: Annual Housing Requirement - Newtownards**

	dPS 2017-2032		dPS 2022-2032*		Adjusted dPS 2025-2032***	
	Total	Annual	Total	Annual	Total	Annual
<b>Ards &amp; North Down</b>	15,608	1040	12,649	1264	11055	1579
<b>Newtownards**</b>	4,214	280	3381	338	2949	<b>421</b>

\* base data updated in 2022, therefore capturing completions from 2017-2032. New requirement for the remainder of the plan period is 15,608 minus 2959 (completions Apr 2017-Mar 2022).

\*\* Newtownards requirement for 2017-2022 based on 27% of total allocation.

\*\*\* Requirement amended to take account of cumulative shortfall from 2022-2025.

Note - annual requirement has increased as a result of low completion levels (under delivery) up to March 2024.

4.53 Progress to date can be tracked using data (largely) from the Housing Monitor:

**Table 4.8: Housing delivery against Newtownards' Requirement**

	Annual requirement	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25**	Total
<b>Ards &amp; North Down*</b>										
completions		672	672	616	543	456	557	407	621	4544
difference against requirement	1040	-368	-368	-424	-497	-584	-483	-633	-419	-3776
	1264						-707	-857	-643	<b>-2207</b>
<b>Newtownards*</b>										
completions		181	181	108	136	111	160	86	167	1130
difference against requirement	280	-99	-99	-172	-144	-169	-120	-194	-113	-1110
	338						-160	-252	-171	<b>-583</b>
% of total completions in Newtownards				17.5	25	24	28	21	27	

Unless otherwise specified completions data is from Council HLARs

\* Total completions for 2017-2019 based on 672 assumed figure by the Council and Newtownards completions for 2017-2019 based on 27% of total completions for Ards & Down as detailed monitoring is unavailable for that time.

\*\* Completions for 2024/25 based on LPS data. Newtownards completions for that period based on 27% allocation for Ards & Down

Note - known under delivery so far of 583 from March 2022 (583 must be added to allocation for remaining plan period) - 2025-2032 Allocation for Newtownards is (338 x 7) + 583 = 2949

- 4.54 This shows that there has been a shortfall in delivery in Newtownards of 583 homes up to 2024/25.
- 4.55 Looking into the future, and taking account of the Turley estimated delivery of homes from the Council's sources of land supply, the town will fall further behind in the delivery of its requirement, to the order of 1038:

**Table 4.9: Cumulative Shortfall in Newtownards Looking to End of Plan Period**

	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	Total
Adjusted Annual Requirement up to 2031/32	421	421	421	421	421	421	421	2,947
Turley Estimated Delivery	271	336	416	266	214	205	201	1909
In year difference (shortfall)	-150	-85	-5	-155	-207	-216	-220	<b>-1038</b>

- 4.56 The position that emerges is, notwithstanding the assumed steady and consistent rate of housing delivery on the larger zoned housing sites (NS19, NS20 and NS22), the build rate peaks in 2027/28 before falling back towards 2017/18 in the final years of the plan period as supply diminishes. Even assuming the Council's assessment of the delivery of windfall sites at 70 dpa is correct, the anticipated build rate is also consistently below the adjusted annual requirement of 421, meaning that with every passing year the town gets further and further behind its Plan Strategy allocated requirement until at the end of the plan period 1621 less homes than allocated have been delivered (583 plus 1038).
- 4.57 The main factors driving this lower trajectory of development (aside from the NIW unknown) are:
- a reduction in the overall number of development yielding sites;

- the lack of development intent with the Development Opportunity Sites and Urban Capacity Sites as determined by the absence of planning applications for most of the identified sites.

#### **SGS6: Management of Housing Land Release**

- 4.58 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.
- 4.59 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.
- 4.60 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
- 4.61 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.
- 4.62 It concludes that where neither of these two conditions are met, planning permission for the development of Phase 2 lands will be refused.
- 4.63 Justification and amplification is provided in paragraphs 2.55 to 2.59.
- 4.64 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.
- 4.65 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).

4.66 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)

4.67 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.*

4.68 In terms of actual scoring:

**Figure 4.6: Sustainability Appraisal Report Extract**

	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

4.69 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.

4.70 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).*

- 4.71 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.*

- 4.72 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.

- 4.73 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.

- 4.74 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:

- 4.75 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;
- 4.76 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;
- 4.77 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;
- 4.78 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.

- 4.79 It would not be appropriate to introduce it to the Small Towns if it is not being introduced to the Principal Settlements.
- 4.80 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;
- 4.81 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;
- 4.82 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;
- 4.83 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.*

- 4.84 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).*

- 4.85 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.

- 4.86 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).

- 4.87 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.

- 4.88 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.

4.89 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.

4.90 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.*

4.91 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.*

4.92 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.*

- 4.93 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.

#### **Policy HE14 Enabling Development for the Conservation of Significant Places**

- 6.15 Draft Policy HE14 is welcomed, however, changes are required in the drafting and terminology to ensure it is sound.
- 6.16 There needs to be clarity over the use of terms. The policy shifts to referring to 'heritage assets' rather than 'significant places'. Significant Places are defined at para. 15.93. The J&A text also uses the term 'heritage assets'. This is imprecise and is no consistent with the SPPS which defines the term 'significant place'. The policy requires the use of a consistent term in order to meet soundness test C3 and we would recommend that the term 'significant place' in accordance with the SPPS.
- 6.17 The final paragraph of the policy requires compliance with all other policies within the Plan Strategy. Whilst we accept that this will include policy around detailed design, ecological matters etc, the premise of an enabling case is that it will conflict with other policies (as confirmed by para. 15.93 of the dPS). This requires amendment to make the proposed policy sound, as currently it fails soundness test C3.
- 6.18 The J&A text includes reference to the current Best Practice Guide by DoE remaining the relevant guidance to guide applicants and support the determination of planning applications. The position in the guidance outlines how, fundamentally, the case for enabling development rests on there being a conservation deficit and this being the basis for the financial case to be made by applicants. This includes a developers profit forming part of the calculations. Paragraph 15.93 of the J&A text suggests a different basis for the financial case, one based on the profit generated from development. This differs from the position outlined at paragraph 15.95. The places the policy at odds with itself, making the policy incoherent and contrary to the SPPS. It therefore fails to meet soundness tests C3.

6.19 The Best Practice Guidance also supports exploration by an applicant and the Council of sufficient information on which to fully understand a case before making a decision. This would be grounded in the public interest and the basis for the policy. Paragraph 15.94 of the J&A text suggests that the Council can make an early decision on a case without full consideration, which may or may not involve relevant expertise to assess information. This would not be in the public interest and would serve to undermine the basis for the policy. It would also be contrary to the SPPS. The J&A text needs amended to ensure it is coherent and in accordance with regional policy as currently it fails soundness tests C3.

## 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 it 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 Newtownards

- 8.1 Whilst the focus of this submission has been strategic and makes the case for ensuring continuity of a supply of homes in Newtownards commensurate with its scale, and we recognise that consideration of the locations of any future zonings is for the LPP, it is important to make good the point that the town is physically capable of accommodating small scale extensions, without harm to its setting or character.
- 8.2 As illustrated at Appendix 4, the physical constraints to the growth of Newtownards are well established. The coalescence considerations to the north (Bangor) and landscape setting elsewhere around the edges of the town reduce the potential for large scale greenfield expansion, suggesting that the focus should be on smaller zonings at appropriate locations.
- 8.3 There is an opportunity to extend Northland's successful development at Tullynagardy onto land which was previously zoned. A relatively small scale adjustment to the development limit, the identified lands could be brought forward without harm to the landscape setting of the town and would deliver high quality housing as well as improved amenity for local residents through an extensive area of open space – see Appendix 1 of Appendix 1.
- 8.4 Sites such as this, providing a 'rounding off' to the settlement limit will help to deliver a more continuous and sustainable supply of housing in Newtownards in the short to medium term, to supplement the increased delivery on zoned land to the north and east of the town as infrastructure delivery issues are overcome.

## **Appendix 1: POP Representation**

**Ards and North Down Borough Council**  
Representation to Preferred Options Paper on  
behalf of Northland Developments Ltd in  
respect of land at Tullynagardy, Newtownards

August 2019

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## Executive Summary

1. This representation is submitted on behalf of Northland Developments Ltd relation to lands at Tullynagardy, Newtownards.
2. In operation since 1995, Northland Developments have been building quality homes in the North Down Area for over twenty years having established well known developments such as Ardvanagh, The Hastings, Stonebridge Village, Bridgelea, Lily Wood Lane, Tullynagardy and Woodgate, to name but a few.
3. Their most recent and ongoing developments, Lily Wood Lane, Claremont at River Hill and The Green at Bridgelea, offer the same high standards as their previous developments catering for all needs from the first time buyer to the larger detached family home.
4. The company is familiar with the planning process, including the Local Development Plan (LDP) making process, having prior experience with the Ards and North Down Area Plan (ADAP) process.
5. Northland Developments welcomes this opportunity to response 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.
6. This representation relates to land which is not currently zoned under the Ards and Down Area Plan 2015 (ADAP 2015) although lies adjacent to Housing Zoning NS27.
7. Commentary is provided in relation to the relevant policy and strategic considerations set out in the Preferred Options Paper (POP), having regard to the site specific interest.
8. Below is a summary of our key comments we wish to make in relation to the Preferred Options Paper.

### **Summary of Key Comments**

Question	Comment	Cross Ref.
<b>Strategic Objectives</b>		
Q.7	The vision is positive but could be made even more positive by a reference to growth.	Section 4, Para. 4.15
Q.8	There are issues with some of the People/Social objectives. These are set out below;  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	Section 4, Para 4.16

	plan horizon given the time it will take to adopt this plan and review/prepare another.	
Q.9	None missed but we would query whether the Council is being ambitious enough.	Section 4, Para 4.18

**Key issue 1: To facilitate development through developer contributions**

Q.10	The aim of developer contributions is stated as facilitating development. Whilst we acknowledge that reasonable or proportionate costs may sometimes be required to support development, we are concerned that the POP's approach has the potential to discourage development by identifying requirements without a full understanding of the potential of a site and the other costs associated with its delivery.	Section 5, para 5.1 to 5.7
Q.11	Identifying sites where developer contributions would be required would not be sound because it would prejudice an assessment that would be best made during the development management process.  Furthermore, in determining the preferred options the Council has not undertaken any assessment of the impact that the preferred option would have on the deliverability of sites.  As such it fails against soundness tests CE2 & CE3.	Section 5, para 5.8 to 5.12

**Key Issue 2: Settlement Hierarchy**

Q.12 to Q.15	No issue provided the reclassification does not affect the potential for additional growth in the larger towns.	Section 6, para 6.2
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**Key Issue 3: Housing Allocation**

Q.17	We fundamentally disagree with this preferred option. It is unsound in both its approach to housing need and supply side assumptions.  It fails against soundness tests CE1 & CE2.	Section 7, para 7.2 to 7.26
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**Key Issue 7: Urban and Rural Housing – Facilitating Affordable Housing**

Q24 & Q25	We partially support the Council's preferred option in that we agree that the Local Development Plan is the primary mechanism through which affordable housing should be	Section 8
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delivered.

However we consider that without further consideration the proposed policy approach could fail against soundness tests CE1, CE2 and CE4.

**Sustainability Appraisal – Interim Report and Scoping (incorporating Strategic Environmental Assessment).**

Q91	The SA is fundamentally flawed and as such the plan fails against soundness test P3.	Section 3
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# 1. Introduction

1.1 This representation has been prepared on behalf of Northland Developments Ltd, in response to a consultation on the Ards and North Down Borough Council ('the Council') Local Development Plan (LDP). On 17 May 2019, the Council published their LDP Preferred options Paper ('POP') for consultation. This representation responds to the contents of the POP.

1.2 The following background documents, prepared by the Council have also been considered in preparing these representations:

- Local Development Plan Position Paper - Housing Allocation;
- Local Development Plan Position Paper – Population and Housing;
- Local Development Plan Position Paper – Settlement and Placemaking; and
- Ards and North Down Borough Council Local Development Plan. Interim Sustainability Appraisal Report incorporating Strategic Environmental Assessment, March 2019.

## **Structure of the representations**

1.3 This report is structured to reflect the questions set out in the POP provided by the Council.

1.4 Chapter 3 outlines the subject site, its key design principles and rationale for zoning as additional housing land.

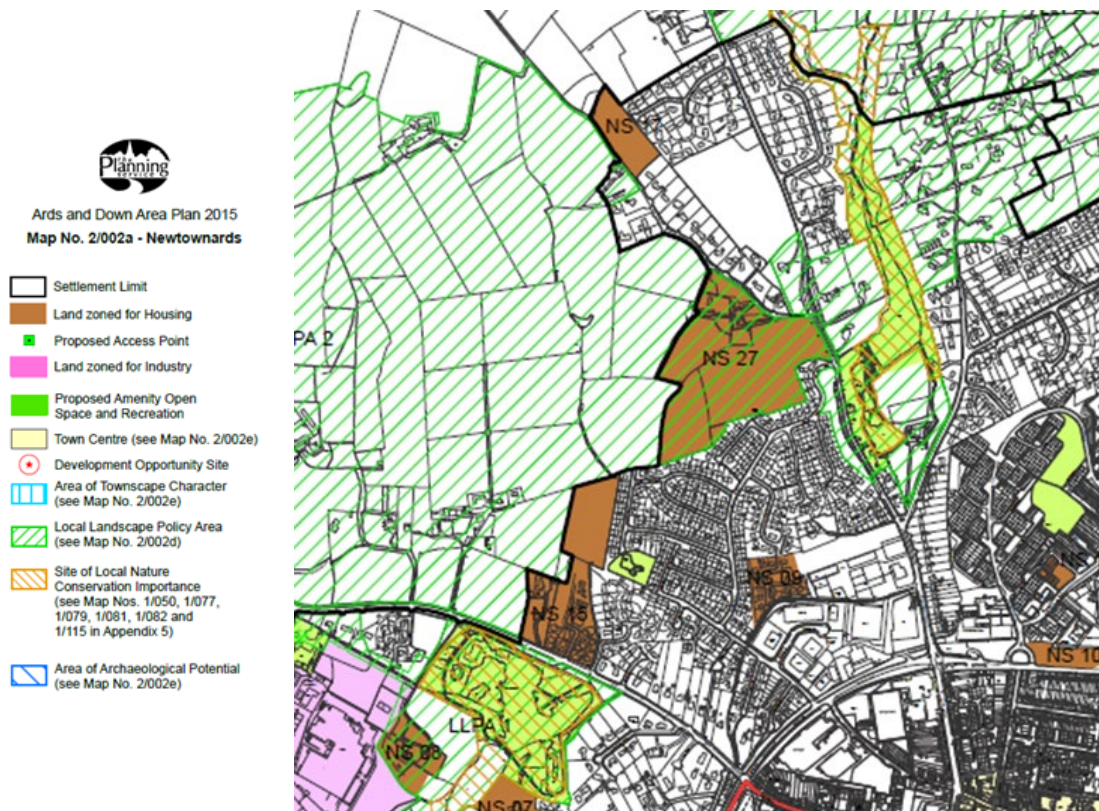
1.5 Chapter 4 provides a review of the Sustainability Appraisal prepared by the Council.

1.6 Chapters 5 – 9 respond to the following key issues and questions set out by the Council within the POP.

1.7 Chapter 10 sets out our concluding comments in respect of the key issues within the POP.

## 2. The Subject Site

- 2.1 This representation is submitted on behalf of Northland Developments Ltd, having regard to how the preparation of the LDP might affect their lands at Tullynagardy, Newtownards.
- 2.2 This representation is submitted at this strategic stage in support of the future allocation of these lands for residential development within the settlement limit of Newtownards at Local Policy stage.
- 2.3 The site comprises circa 18.29Ha of undeveloped agricultural land and sits to the west of the ADAP Housing Zoning NS 27 (known as Tullynagardy) and North West of Valencia Way North.
- 2.4 The topography of the site slopes from approximately 71m above sea level at the northern boundary of the site (with a maximum elevation of 77m at the highest point) to 36m above sea level at the southern boundary.
- 2.5 The site also lies within a Local Landscape Policy Area.
- 2.6 A majority of the NS27 has been built out under planning approval X/2010/0054/F, with a further planning application to be submitted in the coming weeks for 64 no. dwellings to complete the zoning.
- 2.7 An extract of the ADAP is provided below in Figure 2.1 below;

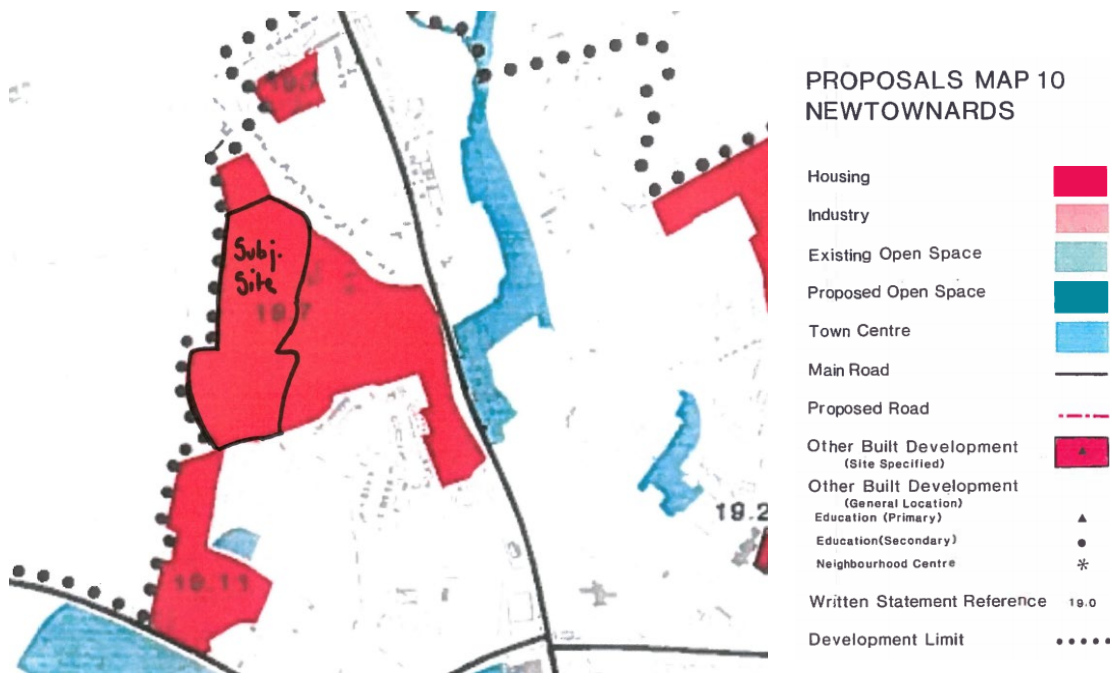


**Figure 2.1: Extract from Ards and North Down Area Plan 2015 (Map No. 2/002a)**

2.8 Zoning NS27 sets out the following key site requirements;

- Housing development to be a minimum gross site density of 15 dwellings and a maximum gross site density of 20 dwellings per hectare;
- Development of the site will be dependent upon the upgrading of the junction at Talbot Street/Crawfordsburn Road and Hardford Link. A developer contribution will be required for this upgrade and will be directly proportional to the impact of the NS 27 development on this junction. In order to determine the extent of this impact, a transport assessment will be required to accompany any future development proposal for these lands;
- A footway will be required along the entire site frontage onto both the Crawfordsburn Road and Tullynagardy Road and to existing footway network;
- A right turning facility will be required at the junction of Crawfordsburn Road and Tullynagardy Road;
- A full survey of existing vegetation within the site and retention of trees and hedgerows where possible, allowing for safe and controlled access, with replacement planting of an indigenous species;
- The mature vegetation around the existing two-storey dwelling and outbuildings at No. 8 Tullynagardy Road to be protected and retained;
- Access arrangements and dwelling layout to be designed to ensure that houses front onto existing and any proposed access roads;
- The boundaries of the site adjacent to the open countryside (and LLPA 2) to be landscaped with an 8-10 metre belt of trees of native species to provide screening for the development and help integrate it into the surrounding countryside and give definition to the edge of the Settlement Limit; and
- Positive management arrangements to protect and maintain open space and landscaping.

2.9 Historically, the subject lands were previously zoned for housing under the North Down and Ards Area Plan (NAAP) 1984-1995 (shown in figure 2.2 below).



**Figure 2.2 Extract from North Down and Ards Area Plan 1984-1995 (with Subject Site indicated)**

2.10 The amplification text provided within the NAAP (paragraph 19.7) states;

*'It is recommended that lands to the north and south of Tullynagardy Road, and lands adjacent to Whiteways, most of which were previously zoned, should be developed at medium densities while higher densities, to complement existing private and public sector development, are envisaged in the eastern sector of the town.'*

### Planning History

2.11 Northland Developments Limited are familiar the Local Development Plan (LDP) making process, having prior experience with the Ards and North Down Area Plan (ADAP) process in respect of this site and the wider Tullynagardy lands.

2.12 There have been a number of planning applications submitted relating to the development of Zoning NS27 and the subject lands and these are provided at Appendix 2 for information.

### Design

2.13 An illustrative layout plan has been prepared by Alan Patterson Design which demonstrates how a high quality residential development could be established and could integrate with the existing and proposed housing at Tullynagardy.

2.14 This is shown in figure 2.3 below. A larger scale copy of the illustrative layout plan is also provided at Appendix 1 for ease.



**Figure 2.3 – Illustrative Layout Plan**

- 2.15 The proposal seeks to create a development that respects the woodland/existing trees by providing a meandering lane in a landscaping setting to the north of the site, with a mix of high quality detached and semi-detached homes.
- 2.16 Careful orientation and siting of dwellings will mitigate any detrimental impact on amenity and the introduction of an 8-10m landscaped buffer to the western boundary of the site will provide privacy and act as a natural rounding off to the settlement limit.
- 2.17 Focusing the built development to the southern portion of the site and including the landscaped buffer along the rural edges of the land will ensure that visual amenity and townscape will not be detrimentally impacted – particularly when viewing the site from a distance at Scrabo Tower. This issue was discussed in detail at the ADAP 2015 PAC Inquiry and we consider this to have been positively addressed in the proposed illustrative layout above.

**Density**

- 2.18 The proposed density is in keeping with the existing Tullynagardy development. The buildable area extends to approximately 8.56 acres which would equate to approximately 75-85 no. units based upon a density of 9-10 units per acre.

### **Open Space**

- 2.19 A large area of public open space is proposed to the north of the site, where the lands sit at approximately 77m above sea level. There is an opportunity to provide quality green space which can facilitate a meandering pedestrian/cycle route around the site.
- 2.20 There is also an opportunity for the site to link to the forested area to the north east

### **Access and Parking**

- 2.21 The site is in a sustainable location within walking distance of local amenities including the Hardford Link Spar Store, Corry Street play park facilities and Londonderry Primary School. It is also a 20 minute walk from Ards Shopping Centre and Newtownards Town Centre.
- 2.22 Access can be accommodated via main road through the second phase of the Tullynagardy development once completed. An application for Phase 2 is to be submitted to the Council imminently.
- 2.23 One of the KSRs of the NS27 zoning states that;

*'Development of the site will be dependent upon the upgrading of the junction at Talbot Street/Crawfordsburn Road and Hardford Link. A developer contribution will be required for this upgrade and will be directly proportional to the impact of the NS 27 development on this junction. In order to determine the extent of this impact, a transport assessment will be required to accompany any future development proposal for these lands.'*

- 2.24 Analysis of the junction undertaken to support the imminent Phase 2 development proposals has demonstrated that there is a level of reserve capacity should that application be approved.
- 2.25 Further analysis of the junction will be undertaken at the Development Management Stage should the subject site become zoned to confirm the operational performance of the junction.
- 2.26 Furthermore, the public open space proposed includes a 'greenway' link around the site and to the wider area and will help to promote active travel, achieving the overarching strategic aims of the Council in respect of the health and wellbeing across the Borough.

### **Contaminated Land**

- 2.27 The site is undeveloped agricultural land. We do not envision there to be any contamination issues which would preclude development of this land for housing.

### **Ecology**

- 2.28 We do not envision there to be any ecological issues which could not be resolved or mitigated through the development management process.

### **Drainage and Flood Risk**

- 2.29 The NI Flood Maps indicate no fluvial or coastal flood plain within the site. There is marginal pluvial flooding estimated through the centre of the site. There is no history of flooding and it is not in the inundation zone of a reservoir.

### **Principle of Development**

- 2.30 The principle of development of the lands for housing was first established by the NDAAP a number of years ago as shown in figure 2.2 above.
- 2.31 Whilst the subject site is not currently included within the settlement limit, if zoned, it could provide more deliverable housing in the short to medium term once the full NS27 zoning has been completed. We anticipate the full NS27 zoning to have been completed by 2023.
- 2.32 The Council should not become over reliant on the larger sites in Newtownards to deliver their required housing and should have a sufficient supply of smaller and deliverable sites which could provide a supply in the short to medium term.
- 2.33 Inclusion of this site within the settlement limit would provide both a high quality housing development which is deliverable in the short to medium term, whilst the larger zoned sites in Newtownards will be delivered in the longer term, subject to phasing, infrastructure upgrades and provision of community facilities.
- 2.34 The site would also provide an extensive area of public open space which is consistent with Part 1, Section 1 of the Planning Act (Northern Ireland) 2011 to;
- ‘secure the orderly and consistent development of land whilst furthering health and wellbeing.’*
- 2.35 A further analysis and consideration of housing supply in Newtownards is provided in Chapter 7 of this document.

### 3. Sustainability Appraisal

#### A Review of the Sustainability Appraisal

- 3.1 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’.
- 3.2 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.
- 3.3 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.
- 3.4 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.
- 3.5 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’).
- 3.6 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.”*
- 3.7 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.

3.8 A number of concerns have been identified by this review regarding the process and content of the Interim SA, as summarised below:

- (a) 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;
- (b) Failure to develop the evidence base to allow the settlement hierarchy to inform the housing allocation options within the POP; and
- (c) 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).

3.9 The following sections discuss these concerns in greater detail.

#### **Assessment of Reasonable Alternatives**

3.10 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.

3.11 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.

3.12 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.

3.13 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.

3.14 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.

- 3.15 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**

- 3.16 A more detailed review of the Housing Allocation options and the preferred option forming part of the Spatial Growth Strategy has been undertaken.
- 3.17 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.
- 3.18 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).
- 3.19 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.
- 3.20 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.
- 3.21 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.”*

- 3.22 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.
- 3.23 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.
- 3.24 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**

- 3.25 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.
- 3.26 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**

- 3.27 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.

## 4. The Council's Vision & Ambition

### Plan Period

- 4.1 The plan period itself is identified as extending to the year 2030 – a 15 period from the transfer of planning powers to local Councils in 2015.
- 4.2 On review of the Councils latest Local Development Plan timetable, published in November 2017, we note that the Local Policies Plan is not expected to be adopted until 2024.
- 4.3 Ards and North Down Borough Council is the last Council to publish its preferred options paper, yet it's plan horizon of 2030 is one of the shortest of all 11 Councils.
- 4.4 When looking to English practice in the preparation of local development plans, the NPPF provides helpful guidance in paragraph 22 which states that;
- 'Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.'*
- 4.5 We would recommend an extension to the plan period up to circa 2035. As a comparative, Belfast City Council have established a plan period to 2035 (it published its POP in January 2017).
- 4.6 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.
- 4.7 Otherwise, the risk is that when the Local Policies Plan (LPP) is finally adopted, comparison with the previous plans could raise questions around what has actually changed. Given the relatively limited change from NDAAP

### Test of Soundness

- 4.8 In order to meet the test of soundness, we would recommend an extension to the plan period.

### Strategic Objectives

- 4.9 Northland Developments support the Councils Strategic Objectives which have been identified under the three key themes; protecting and enhancing the environment; promoting economic vitality; and ensuring cohesive and safe communities and supporting healthy lifestyles.
- 4.10 In relation to housing supply, the second objective currently reads;
- 'to provide a sufficient supply of land for new housing to meet the housing needs up to 2030.'*

4.11 We would recommend that this is amended to read;

*'to **monitor and manage** a sufficient supply of land for new housing to meet the housing needs up to 2030.'*

**Q6. Do you have any comments on the District Profile and Policy Strategy that should be taken into account when preparing the Plan Strategy?**

4.12 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 we would seek clarity on how 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.

4.13 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.

4.14 The question asks for comment on Policy Strategy but there is no information on Policy Strategy, only the Policy Context, which identifies the planning and other policy context for the preparation of the LDP. Reference is made to the regional direction set out in the Regional Development Strategy but there is no explanation of the Council's interpretation of this direction.

**Q7. Do you agree with the Proposed Vision? 'Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live.'**

4.15 The vision is positive but could be made even more positive by a reference to growth.

**Q8. Do the aims and objectives strike the right balance between social, economic and environmental considerations?**

4.16 There are issues with some of the People/Social objectives. These are set out below;

- 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. This has been outlined in the paragraphs above.

4.17 The Council's support for Good Design and Positive Place Making is welcome.

**Q9. Are there any issues that we have missed from our Vision, Aims or Objectives?**

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

## 5. Developer Contributions

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

The aim of developer contributions is stated as facilitating development. Whilst we acknowledge that reasonable or proportionate costs may sometimes be required to support development, we are concerned that the POP's approach has the potential to discourage development by identifying requirements without a full understanding of the potential of a site and the other costs associated with its delivery.

#### **Full response**

- 5.1 Developer contributions should only be sought in line with the requirements of the Strategic Planning Policy Statement for Northern Ireland (SPPS).
- 5.2 The SPPS details that the council or, as the case may be, the Department may consider the use of a planning agreement where what is required cannot be adequately addressed by the imposition of planning conditions and;
- is needed to enable the development to go ahead;
  - will contribute to meeting the costs of providing necessary facilities in the near future;
  - is otherwise so directly related to the proposed development and to the use of the land after its completion, that the development ought not to be permitted without it;
  - is designed to secure an acceptable balance of users;
  - is designed to secure the implementation of development plan policies in respect of a particular area or type of development; or
  - is intended to offset the loss of, or impact on, any amenity or resource present on the site prior to development.
- 5.3 The POP suggests that a policy will be introduced within the Draft Plan Strategy (DPS) that will allow the Council to seek contributions from developers for reasonable or proportionate costs of works required to facilitate their development via the use of Planning Agreements or Section 76 Agreements.
- 5.4 The draft policy would identify the instances when Developer Contributions would be required, including details on the level of contributions and any exemptions. The Local Policies Plan (LPP) would also identify specific
- 5.5 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.'*

- 5.6 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.
- 5.7 The plan must take care not to introduce a policy which would negatively affect decisions by developers to invest. Development is a voluntary activity and care must be taken as a policy which discourages development could undermine the ability of the plan to achieve its strategic objectives as their delivery is heavily dependent on private sector delivery and investment.

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

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

**Furthermore, in determining the preferred options the Council has not undertaken any assessment of the impact that the preferred option would have on the deliverability of sites.**

**As such it fails against soundness tests CE2 & CE3**

***Full Response***

- 5.8 The Council's preferred option is;
- 'Option 1a: provide strategic policy on developer contributions through the Local Development Plan and identify sites where developer contributions would be appropriate in the Local Policies Plan.'*
- 5.9 Identifying sites where developer contributions would be required would not be sound because it would prejudice an assessment that would be best made during the development management process.
- 5.10 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.
- 5.11 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.

5.12 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.

## 6. Spatial Growth Strategy & Settlement Hierarchy

### **Q12. Do you agree with the preferred option?**

6.1 The preferred option selected by the Council is Option 2b;

*'Define a new settlement hierarchy allowing for the re-classification of existing settlements and potential introduction of new settlements.'*

6.2 We see no issue provided the reclassification does not affect the potential for additional growth in the larger towns.

### **Q13. Do you think the existing settlement hierarchy should be maintained or that settlements should be re-classified within the hierarchy and new settlements identified?**

6.3 It is accepted that it is appropriate to review the positions of settlements in the settlement hierarchy during the plan making process.

### **Q14. Do you agree with the indicative settlement hierarchy shown in the Preferred Options Paper?**

6.4 We generally agree with the indicative settlement hierarchy shown in the Preferred Options Paper although it is worth noting that Newtownards also has a BMUA function with the RDS clearly identifying it as a main hub. This distinction could be better reflected in the Settlement Strategy.

6.5 In consideration of the indicative settlement hierarchy, whilst there are references to the RDS evaluation framework within the POP itself and some of the supporting Topic Papers, it would have been reasonable for the POP to have also 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.

6.6 A settlement appraisal of Newtownards has been prepared and is included at Appendix 3.

### **Q15. Do you have any suggested changes? Are there any new settlements that you think should be considered?**

6.7 No.

**Q16. Do you have any comments on the Spatial Growth Strategy - Economic Development?**

- 6.8 We 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, we would seek clarification if the Council gave due 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.

## 7. Housing Allocation

7.1 The Council has selected Option 3b which is to;

*'Re-evaluate existing housing zonings and allocate additional housing land, if required, to ensure continued modest housing growth (using sequential approach in the Strategic Planning Policy Statement)'*

### **Q17. Do you agree with the preferred option?**

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

**Is fails against soundness tests CE1 and CE2.**

#### ***Full Response - Housing Need***

- 7.2 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.
- 7.3 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.
- 7.4 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".
- 7.5 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.
- 7.6 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.

#### ***Full Response - Housing Supply***

- 7.7 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.
- 7.8 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 Plan Practice Note 5 (Preferred Options Paper) 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 availability of the Sustainability Assessment to properly assess the merits of alternative options for accommodating growth.

- 7.9 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.
- 7.10 The Council’s Local Development Plan Team currently undertakes a Housing Land Availability Monitor to determine the number of housing units built and to allow an assessment of remaining housing potential within settlements throughout the Borough. The Housing Monitor facilitates the identification of a shortfall in potential housing land supply and can provide clarity and certainty to developers in relation to the availability of land suitable for housing.
- 7.11 On review of the latest available Housing Monitor data for Newtownards (dated as of 1 August 2018), a number of discrepancies become clear.
- 7.12 The Housing Monitor itself notes that;  
  
*‘This report excludes Phase 2 Development Land.’*
- 7.13 There are a number of zonings which have not been included within the Housing Monitor for Newtownards – yet are not Phase 2 development land. For example, major housing zonings NS20 (housing monitor mapping reference 13863) and NS19 (housing monitor mapping reference 13862).
- 7.14 There also appear to be discrepancies between the housing land supply table included in the Housing Allocation Topic Paper published as part of the Preferred Options Paper evidence base when compared to the 2018 Housing Monitor data.

NILUD <sup>1</sup> 2010 – 01/04/2018	Remaining Potential		
	No.	Overall %	Area (ha)
<b>Large Towns</b>			
Bangor	2440	23.40%	70.148
Newtownards	3900	37.41%	188.99
<b>Large Towns Total</b>	<b>6340</b>	<b>60.81%</b>	<b>259.138</b>

**Figure 7.1 - Housing Allocation Topic Table 6: Housing Availability across Ards and North Down**

	Remaining Units	Area Remaining
<b>Newtownards</b>	1798	74.79Ha

**Table 7.1 – Summary of Newtownards Housing Monitor Data (as of 1 August 2018)**

- 7.15 The figures above should be interrogated and clarified.
- 7.16 The larger zoned sites and their deliverability within Newtownards are further interrogated in the table below.

**Table 7.2 – Interrogation of Deliverability of Large Housing Sites**

Zoning	Planning Ref/History	Potential Yield	Deliverability
NS19	No relevant planning history	Circa. 670-840 based on KSRs.	<p>The site has not come forward for development since the adoption of ADAP in 2009.</p> <p>Development of these lands is reliant upon the upgrade or realignment of the Ballyreagh Road in accordance with Policy TRAN 2, which will bring south and west bound traffic on to the Old Shore Road / Portaferry Roads and westward via the Castlebawn road line.</p> <p>There are multiple landowners and no extant planning permissions on the site. It is unlikely this will come forward in the short to medium term.</p>
NS20 (potential to deliver up to 1,200 units)	X/2014/0370/F LA06/2017/0533/F	Potential to deliver up to 1,200 units. Approval to date for 279 units.	<p>Each phase is dependent on delivery of further sections of the distributor road.</p> <p>Phase 1 is substantially complete with a majority of units occupied.</p> <p>Phase 2 has been approved at but the decision notice is subject to a Section 76 agreement.</p> <p>An application for Phase 3 has not yet been submitted.</p> <p>Phases 3-5 also bear substantial key infrastructure requirements including community facilities.</p> <p>The site is noted as having capacity to deliver 1,200 dwellings – although based on the density provided for to date, we would estimate this to be lower – around 850 dwellings.</p> <p>We anticipate the housing supply may slow as more infrastructure is required through the phases.</p>
NS21	X/2011/0247/O X/2013/0336/RM X/2014/0280/RM LA06/2015/0935/RM	Phase 1a – 57 Phase 1b - 37 Phase 2 – 413 Potential to	<p>The site is to be delivered in 3 phases with a further RM application to be submitted.</p> <p>Infrastructure upgrades are required and we anticipate delivery of the full site in the</p>

	deliver up to 530 (as per CMP submitted with outline)	medium to longer term.
<b>Total</b>	<b>2,050 to 2,570</b>	<b>52% to 65%</b> of Newtownards potential yield is solely dependent on delivery of these 3 zonings.

- 7.17 The deliverability of Zonings NS19, NS20 and NS21 hinges on the agreement at the public inquiry into the Ards and North Down Area Plan that the key roads infrastructure required to enable these sites to come forward (known as the Eastern Distributor Road) would have to be provided by the developer of each of these sites.
- 7.18 Whilst delivery of the roads infrastructure within Zoning NS20 has been resolved, the site will likely be delivered in the medium to longer term, given the infrastructure requirements as outlined in table 7.2 above.
- 7.19 Our analysis has shown that between 52% and 65% of the total potential yield (as per figure 7.1 above) in Newtownards is dependent on the deliverability of only three zonings, which each come with their own challenges.
- 7.20 It is not to say that these sites are wholly undeliverable – it is known that generally these types of sites will take longer to develop and will provide a slower rate of supply. But it is incumbent on the Council to interrogate the housing land supply data in order to satisfy itself that there is an effective supply – not only from the larger sites, but smaller sites which can contribute to the 5 year housing land supply.
- 7.21 Long standing sites which have not delivered houses may also need to be discounted from the housing land supply because they cannot be relied upon.
- 7.22 The data also clearly shows that a large number of the housing monitor sites are small scale, with an equivalently low yield. Whilst we appreciate the importance of windfall and urban capacity sites (in the context of an overall housing land supply, the LDP’s housing strategy should not over rely on this source of potential supply to the exclusion of medium sized sites owned by housebuilders or willing landowners which can make a significant and consistent contribution to the town’s housing requirements over the plan period.
- 7.23 The POP should have proposed and assessed options on the basis of this evidential context, not proposed an option involving the assessment of information which is already available.
- 7.24 Deliverability of sites in the short to medium term in order to meet the five year housing land supply is critical to the delivery of the Councils strategic housing objectives.

- 7.25 Smaller zonings at appropriate locations around the edges of the town which will provide a '*rounding off*' to the Settlement limits will help to deliver a more continuous and sustainable supply of housing in Newtownards in the short to medium term whilst deliverability issues relating to the larger zoned sites to the north east and east of the town are resolved. These larger sites are more likely to be delivered in the longer term and cannot be heavily relied upon in meeting the five year housing land supply.
- 7.26 Other sites which are more likely to be delivered for housing should be considered such as the subject site at Tullynagardy.

## 8. Facilitating Affordable Housing

8.1 The Council's preferred option is:

*"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."*

**We support the Council's preferred option in that we agree that the Local Development Plan is the primary mechanism through which affordable housing should be delivered.**

**However we consider that without further consideration the proposed policy approach could fail against soundness tests CE1, CE2 and CE4.**

### **Q24. Do you agree with the preferred option?**

8.2 The SPPS (paragraph 6.143) sets out that:

*'The HNA/HMA undertaken by the Northern Ireland Housing Executive, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing.'*

8.3 We therefore support the approach that the provision of affordable housing will primarily be facilitated through the Local Development Plan.

### **Q25. Do you agree with the Council's preferred option for addressing affordable housing need in the borough?**

8.4 Whilst we support the intention of the Council to facilitate the delivery of affordable housing through the LDP, it is considered that there is insufficient evidence provided to justify the preferred approach and therefore it could be unsound, for the following reasons:

- Whilst the Council's Position Paper acknowledges that NIHE has confirmed a need for affordable/social homes across the plan period the Council has not provided the HNA/HMA in support of the preferred option;
- It is unclear from the information provided by the Council where the need for social housing is in the Borough;
- The proposed approach could conflict with other policies. In particular the Council contends in the POP that there is sufficient land available within the Borough to deliver the Council's housing requirement and that no additional land is needed. The preferred options could result in land being zoned for social

housing, however the existing committed sites may not be in the same locations as where the prevailing need exists; and

- The Council also contends that there is sufficient land within the Borough to deliver housing need, however no assessment has been undertaken to understand whether committed sites would be viable following the introduction of a requirement for affordable housing.

8.5 In preparing a policy approach to be identified with the draft Plan Strategy, the Council should ensure that the approach:

- Is based on robust assessment of locational need;
- Is coherent with other policies within the plan; and
- Does not impact of the deliverability of site.

## 9. Protecting and Enhancing Local Nature Conservation Sites and Scenic Landscapes

9.1 The Council have selected 24a as their preferred option which states;

*'Review local nature conservation sites and scenic landscapes and formulate appropriate accompanying policy for their protection and enhancement.'*

**Q54. Do you agree with the preferred option?**

9.2 We agree with the preferred option set out.

## 10. Summary & Conclusions

- 10.1 Northland Developments welcome the opportunity to join the debate about the future development of the Borough.
- 10.2 Whilst the POP would suggest that there is a generous allocation of housing to Newtownards, the scale of the housing sites which contribute to this supply bring infrastructure requirements which will slow down their delivery.
- 10.3 Taking account of the need to extend the Plan Period to 2035 to meet guidance and get best value from the LDP process, it is important that when reviewing the effectiveness and delivery of its housing land supply, the potential of smaller sites which can be brought forward quickly is recognised by the Council.
- 10.4 There is an opportunity to extend Northland's successful development at Tullynagardy onto land which was previously zoned. A relatively small scale adjustment to the development limit, the identified lands could be brought forward without harm to the landscape setting of the town and would deliver high quality housing as well as improved amenity for local residents through an extensive area of open space.

## **Appendix 1: Illustrative Site Layout**



Proposed viewing area within proposed Public Park

Proposed 8-10m landscaping buffer to rural edge of proposed lands

Site Boundary

Pedestrian linkages within proposed lands

Linear landscape features retained and augmented

Pedestrian links along linear open space connecting the existing residential development at Korona Park with the proposed new Public Park

Proposed access from existing development

Proposed new dwellings with relaxed road network designed to front towards vehicular routes and areas of open space

Pedestrian access from existing residential development at Korona Park

Existing residential development on the Tullynagardy Road

Proposed public parking to serve public 'Park' and viewing area

Area under consideration under planning application reference LA06/2019/0558/F

Existing vehicular access to Tullynagardy Road

Existing residential development at Tullynagardy development

Proposed extension to Tullynagardy development within the bounds of residential zoning NS27 of Ards & North Down Area Plan 2015

Existing residential development at Saratoga Avenue / Galla Way



North

**PRELIMINARY**  
 Subject to Planning Permission and all other associated statutory approvals



## Appendix 2: Planning History

Planning Reference	Description	Address	Status
LA06/2015/0685/F	Retrospective application for alterations to include single storey rear extension & garage (previously approved under X/2010/0054/F), and all other associated site works	Lands 22m NW of No 12 Tullynagardy Avenue Newtownards BT23 4UQ	Granted December 2015
X/2014/0146/F	Removal of condition on X/2012/0299/F. Which states that 'no more than 53 dwellings shall be occupied until road improvement works are carried out at the junction of Talbot Street, Hardford Link, Crawfordsburn Road and William Street have been approved and completed to the satisfaction of Roads Service'.	Junction of Talbot street Hardford Link Crawfordsburn Road Newtownards	Granted January 2015
X/2012/0536/F	Additional unit added at site 82a relocation of sites 83-86 change of house type to site 87 and boundary change to site 88 with all associated site works previously approved under reference X/2010/0054/F	Sites no 82a- 88 at lands surrounding 8 Tullynagardy Road falling north of Saratoga Avnue and Galla Way West of Crawfordsburn Road and South of Tullynagardy Road Newtownards	Granted June 2013
X/2012/0485/F	Variation of Condition 4 of permission X/2010/0054/F (relating to timing of occupation of dwellings and external road works)	Lands surrounding 8 Tullynagardy Road falling north of Saratoga Avenue and Galla Way, west of Crawfordsburn Road and south of Tullynagardy Road, Newtownards	Granted June 2014
X/2012/0377/F	Change of house type on sites 1 and 92, change of floor level on site 92 and garage repositioned on site 1 at previously approved residential development Planning Ref. X/2010/0054/F and associated site works.	Site numbers 1 and 92 at lands surrounding 8 Tullynagardy Road falling north of Saratoga Avenue and Galla Way west of Crawfordsburn Road and south of Tullynagardy Road Newtownards	Granted January 2013
X/2012/0299/F	Variation of condition 12 of planning approval X/2010/0054/F from 'No dwelling shall be occupied until the road improvement works at the junction of Talbot Street , Hardford Link, Crawfordsburn Road as previously approved under planning reference X/2006/0246 have been fully completed and so certified by the Department in writing' to 'No more than 53 dwellings shall be occupied until the road improvementworks at the junction of	Junction of Talbot street Hardford Link Crawfordsburn Road	Granted May 2013

	Talbot Street, Hardford Link, Crawsfordburn Road have been fully completed and so certified by the Department in writing'		
X/2012/0247/F	Change of house type on 6 sites(detached dwellings) at previously approved residential development, Planning Ref. X/2010/0054/F, with associated garages & site works, and addition of 2m wide footpath at north side of Tullynagardy Road	Site numbers 4 6 7 8 9 & 14 at lands surrounding 8 Tullynagardy Rd falling north of Saratoga Ave & Galla Way West of Crawfordsburn Rd & south of Tullynagardy Road Newtownards	Granted October 2012
X/2010/0054/F	Residential development of 106 dwellings comprising detached, semi-detached, townhouses and apartments, associated open space landscaping, access and right turn lane on Crawfordsburn Road	Lands surrounding 8 Tullynagardy Road falling north of Saratoga Avenue and Galla Way, west of Crawfordsburn Road, and south of Tullynagardy Road Newtownards Co Down.	Granted March 2012
X/2007/0950/RM	Lands accessed off Tullynagardy Road Newtownards. Previously approved under ref: PAC/2005/A519.	Proposed residential development of 9No detached dwellings and garages and associated siteworks (amended).	Granted January 2010
X/2006/0559/O	Proposed residential development and ancillary works	Lands Adjacent To and to the rear of 8 Tullynagardy Road, Newtownards.	Refused June 2007
X/2006/0560/O	Proposed residential development and ancillary works	Lands at 8 Tullynagardy Road, Newtownards.	Granted August 2008

## **Appendix 3: Settlement Appraisal**

# Settlement Evaluation

July 2019

## Newtownards

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

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

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

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

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## **Appendix 2: Housing Completions Analysis**

# Appendix 2: Housing Completion Analysis

## Issue with Evidence Base

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

## How Many Houses Have Been Completed Since 2017?

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

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

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

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

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

10. This is quoted in the most recent (2024) Housing Land Availability Report alongside such statements as the primary purpose of the Housing Land Availability Report *‘is to inform the preparation of the Councils LDP regarding the allocation of land for housing’* (para 1.2) and it *‘can provide clarity and certainty to developers.’* Unfortunately, the Council’s reporting falls short on both fronts.
11. There are several consequences of this for both the evidence base of the LDP and those wishing to make representations in response to it.
12. In an effort to address this evidential problem, we have consulted the Department of Finance Annual Housing Stock statistics, which are available at Electoral Ward, Local Government District and NISRA Super Output Area from 2008 to 2025.<sup>1</sup>
13. At LGD level it is interesting to note that stock increased from 70,982 in 2017 to 76,464 in 2025 – a net increase of 5,482. Comparing this to the draft Plan Strategy’s new dwelling requirement of 946 dwellings per annum (para 2.48), at the time of writing, the Council is already 2,086 dwellings behind its ‘success scenario’ (8 x 946 = 7,568).
14. By reviewing the LGD Ward map<sup>2</sup>, and comparing the housing stock in 2017 and 2025 it is possible to arrive at an understanding of completions in the main settlements by aggregating wards (see Appendix 5A), summarised below:

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<sup>1</sup> [Annual housing stock statistics | Department of Finance](#)

<sup>2</sup> [dfc-ards-ndown-council-map.PDF](#)

**Table 2: Net Change in Housing Stock 2017-2025**

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

*Source: Department of Finance Annual Housing Stock statistics,*

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

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

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

*Source: Department of Finance (DoF) Housing Stock Statistics*

18. A side by side comparison is provided below:

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

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

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

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

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

*Source: Land & Property Services*

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

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

**Table 6: Available Datasets for AND Completions 2017-2022**

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

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

#### **Progress to Success**

24. Paragraph 2.48 of the Plan Strategy notes that the Edge Analytics modelling concludes that to achieve the 'success' scenario of 9,375 jobs by 2032 would necessitate a population increase of 25,318 which equates to 13,372 households. This gives a total new dwelling requirement of 14,189 over the Plan period or 946 dwellings per annum.
25. Using the Council's Plan Strategy figure of 2,959 homes completed from 1 April 2017 to 31 March 2022 and adding the Council's 2024 Housing Monitor Report completion figures for the 2022 to 2023 period (557), produces a Council completions figure of 3,516 homes for the 2017 to 2023 period. This is 2,160 houses less than the total that should have been provided during this period (5,676).
26. The DoF Housing Stock (Rates) dataset suggests that 5,482 dwellings have been added to the rated housing stock in Ards and North Down from 2017 to 2025. This is 2,086 houses less than the total that should have been provided during this period (7586). Similarly, using the DoF Housing Statistics (Building Control) dataset, this suggests that 4,962 new homes have been completed during this period – 2,606 less than the total that should have been provided.
27. Obviously, applying the 10% flexibility allowance to the employment-led housing growth results in a new dwelling requirement of 1,040 dwellings during each of the 15 years of the plan period from 2017 to 2032, in which case the rate of delivery is even further behind the necessary trajectory.
28. This analysis is provided in good faith to illustrate the consequences of attempting to fill the evidential gap underpinning the draft Plan Strategy.



## **Appendix 3: Housing Land Supply Analysis**

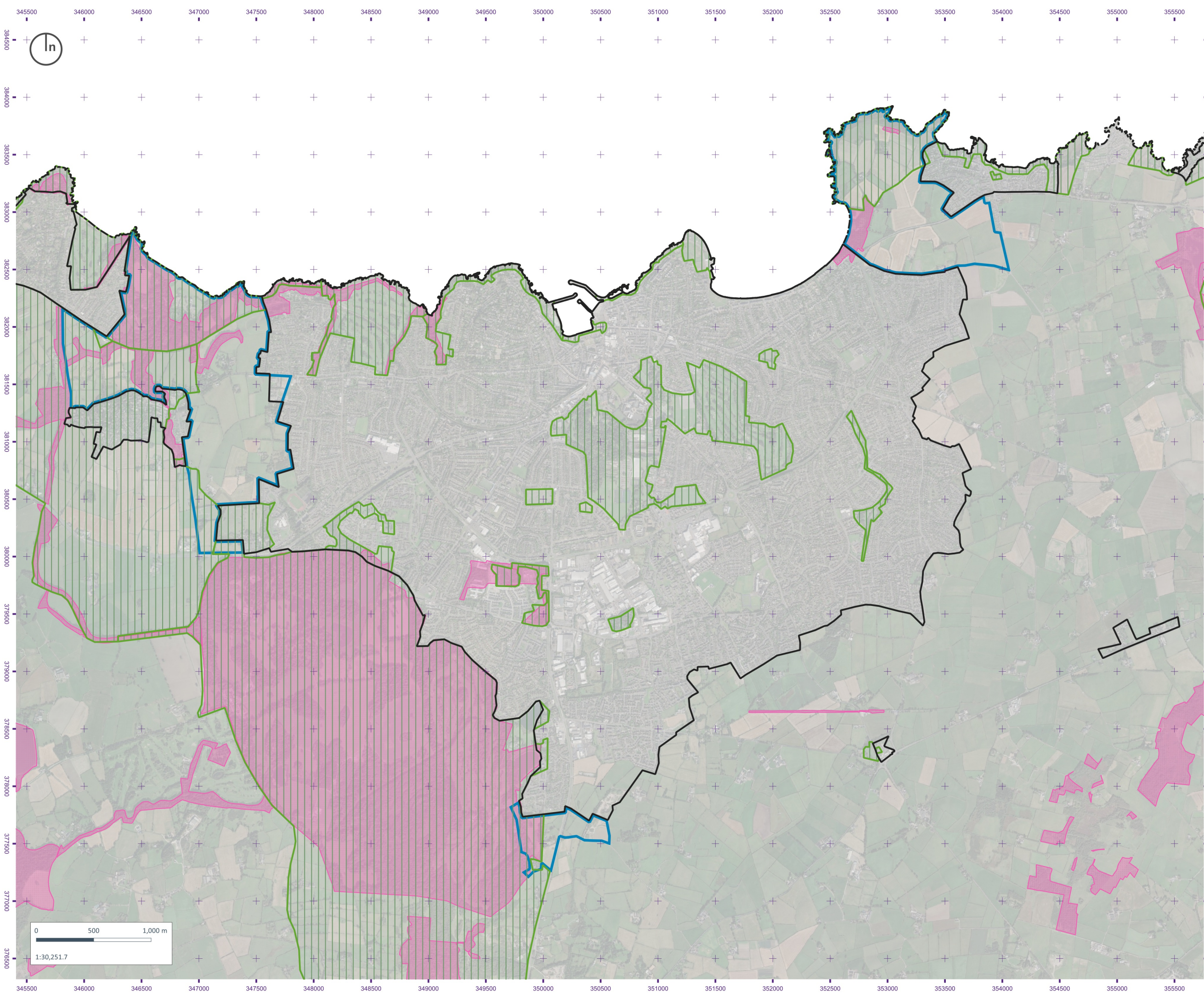
Site Ref	Location	ANDBC Figures (Housing Monitor 2023/2024)			Turley Figures (Site Visits Dec 2025)			Exempt PP (Y/N) & PP Ref (if applicable)	Comments
		Development Status (Not Started/ Ongoing/ Complete)	Housing Units Complete	Remaining Potential	Development Status (Not Started/ Ongoing/ Complete)	Housing Units Complete	Total Remaining Potential		
14135	62-64 South Street	Ongoing	36	126	Complete	69	0	Y LA06/2021/1086/F LA06/2023/1345/F	Councils figures based on PP X/2007/0930/F for 162 no. apartments. This PP was superseded by LA06/2021/1086/F & LA06/2023/1345/F for a total of 69 no. units, as such, overall reduction in density for entire site.
30082	Lands at Marn Factory Site, 200 Comber Road (N013)	Not started	0	236	/	0	236	N	Planned road improvement scheme at this location. DfI Roads cannot recommend approval for applications under consideration (LA06/2018/0766/RM; LA06/2020/0403/RM & LA06/2021/10223/O)
30085	Lands at Ballymahon	Not started	0	675	/	0	675	N	Application under consideration (LA06/2018/1046/O) for max 675 no. units
13149	38 & 40 North Road BT23 7AS	Ongoing	14	12	Not started	0	22	Y LA06/2022/1275/F LA06/2023/1345/F	8 derelict (boarded windows) apartments on site (X/2003/0365/F) Council numbers possibly refer to PP X/2006/0274/F - This is incorrect 7 terraces built out, 9 abs not brought forward.
13407	Ash Grove/Kalmia Avenue	Ongoing	7	9	Ongoing	7	20	Y X/2004/1823/F (7 terraces & 9 no. appts) LA06/2019/0645/F	New app approved Nov 2025 for 20 no. apartments on remainder of site. Overall increase in density.
13564	Mountpleasant, Lands to the rear of No 1-29 Old Belfast Road	Ongoing	50	70	Ongoing	71	0	Y X/2014/0610/F LA06/2018/2031/F	Development split into 3 phases Phase 1 - 11 dwellings Phase 2 - 32 dwellings Phase 3 - 28 dwellings
13588	Lands to rear of 29 Old Belfast Road Newtownards Co Down BT23 4S	Not started	0	5	Not started	0	5	Y LA06/2020/1056/F	
13857	Lands at Movilla Road	Not started	0	24	Not started	0	24	N	Operating retail unit occupying site
13858	Lands at Old Shore Road	Not started	0	16	Not started	0	16	N	
13859	Lands at Balliboy Street	Not started	0	22	Not started	0	22	N	
13861	Lands to the rear of Nos 1-7 Brooklands Avenue & Brooklands Park, Nos 2-24 Alder Grange Park & 57-63 Manse Road	Complete	43	0	Complete	43	0	/	
13863	Lands adjacent to Wyndell Park and Wyndell Court	Ongoing	273	863	Ongoing	279	876	Y	Phase 1 and 2 complete
13864	Lands north of 262 Bangor Road, Downey Way/Walk	Ongoing	30	464	Ongoing	78	416	Y	Phase 1A complete and Phase 1B ongoing
13865	Boxtown Road	Not started	0	69	Not started	0	69	N	
13866	Lands at nos 34-36 North Road and east of laneway to Whitespots	Ongoing	12	50	Ongoing	71	10	Y	71 complete and 10 under construction. Reduction in density by 1 no. unit
13868	Lands surrounding 9 Tullymagary Road	Ongoing	105	11	Complete	108	62	Y LA06/2019/0888/F	X/2010/0054/F (106 no. units); X/2012/0636 (additional 1 no. unit) & LA06/2019/0558/F (additional 1 no. unit) LA06/2019/0888/F relates to undeveloped western portion of site. Planning Committee granted approval in Dec 2025
14022	130/132 Frances Street	Ongoing	6	4	Not started	0	11	N	No indication of any works having been commenced/implemented X/2008/0250/F & X/2014/0470/F both expired
449725	Boxtown Road	Not started	0	10	Not started	0	10	N	
449728	Lands at 20-22 Regent Street & 15-19 Neil Street	Not started	0	23	Not started	0	23	N	LA06/2018/0394/F expired 03 Feb 2025
449760	Land to west of Kilbonga Estate access, south of Old Belfast Road	Not started	0	20	Not started	0	20	N	LA06/2018/0589/F for 20 no. retirement units expired Sep 2024. LA06/2021/1476/F for 29 no. units under consideration
449823	Land south of 27-77 Court Street	Ongoing	0	108	Ongoing	50	45	Y LA06/2023/2434/F	Site under construction & access not available. Revised PP and reduced density. Council figures based on LA06/2019/0603/F which was superseded. C. 50 no. units appeared complete and remaining 45 no. units under construction
449927	The Pub, 80 Upper Greenwell Street	Not started	0	16	Not started	0	16	Y LA06/2022/0725/F	
7626	Lands to east of Teal Rocks Portaferry Road	Ongoing	16	105	Ongoing	45	50	Y	Development split into 4 phases, all development is built with the exception of phase 4 (12 dwellings left to be developed ref: LA06/2020/1213/F) Applications for the development of 16no houses(ref: LA06/2025/0291/F) and 23no dwellings (ref: LA06/2025/0404/F) are currently under consideration
7643	Lands at former Kilbonga House, Belfast Road Site adjacent to (& east of) No 21 Belfast Road Newtownards	Not started	0	60	Not started	0	60	N	LA06/2018/0059/O for 24 no. units under consideration
12665	62 Scarabe Road, Ballyralim, Newtownards, Northern Ireland, BT23 4NW	Not started	0	3	Not started	0	3	N	
13431	136 Upper Greenwell Street, Newtownards	Not started	0	5	Not started	0	5	N	LA06/2023/1606/F - under consideration for 12 apartments
13443	24 North Road and lands to the rear of Nos 26-34 North Road	Not started	0	9	Not started	0	9	Y LA06/2023/2222/F	
13446	18/20 Victoria Avenue, Newtownards	Ongoing	4	5	Ongoing	4	5	Y X/2014/0188/RM	No site access
13456	Site to the immediate rear and within the curtilage of 178 Crawfordburn Road	Not started	0	1	Not started	0	1	N	
14073	7 Westmount Park Newtownards Co Down BT23 4BP	Not started	0	4	Not started	0	4	N	
14078	2A Mark Street 16-24 High Street and 16-20 Conway Square Newtownards	Complete	8	0	Complete	8	0	Y LA06/2017/0218/F	
14180	15 Sunderland Park Newtownards BT23 4BQ	Not started	0	2	Not started	0	2	N	
14205	28 Mountain Road Newtownards	Complete	1	0	Complete	1	0	Y LA06/2020/0338/F	
7627	Lands at no. 28 Portaferry Road	Not started	0	18	Not started	0	18	N	Outline approval (LA06/2018/0115/O) expires May 2026
30010	20 metres North of no. 98 Comber Road, Newtownards	Not started	0	1	Not started	0	1	Y LA06/2020/1015/RM	
30038	41-43 Court Street, Newtownards, BT23 7NX	Not started	0	2	Not started	0	2	N	
30041	49 Court Street, Newtownards, BT23 7NX	Not started	0	1	Not started	0	1	N	
449744	Vacant land to the rear of 58 South St Newtownards	Not started	0	5	Not started	0	5	N	
449764	55A James Street Newtownards	Not started	0	1	Not started	0	1	N	
449784	North-east of 8 Frederick Place, Newtownards	Not started	0	4	Not started	0	4	N	
449802	58 Frances Street, Newtownards	Ongoing	0	1	Not started	0	1	N	
449807	27 Movilla Street, Newtownards	Not started	0	1	Not started	0	1	Y LA06/2021/0275/F	
449808	35 Manse Road, Newtownards	Not started	1	0	Not started	1	0	Y LA06/2023/1332/F	
449827	Land immediately SE of 3 Manse Road, Newtownards	Not started	0	1	Not started	0	1	Y LA06/2021/0356/F	
449844	Lands to the rear of 71-79 South Street Newtownards	Not started	0	6	Not started	0	6	N	Application under consideration (ref: LA06/2025/0402/F) for 9 units
449849	Rear garden of 30 Mountain Road Newtownards	Not started	0	2	Not started	0	2	N	
449867	Site at Lamont Avenue to rear of Nos 13-23 Portaferry Road Newtownards	Not started	0	5	Not started	0	2	N	
449908	Lands North of 110d Movilla Road, Newtownards	Ongoing	0	8	Complete	8	0	Y LA06/2022/0324/F	
449911	118 Movilla Road and lands between 118 Movilla Road and 1 Millford Manor	Ongoing	0	8	Complete	8	0	Y LA06/2022/0324/F	
449913	4 Movilla Road, Newtownards	Not started	0	5	Not started	0	5	Y LA06/2021/1462/F	
449916	Movilla Gospel Hall, 58 Movilla Road, Newtownards	Not started	0	5	Not started	0	5	N	
449923	Land at the rear of 1-3 Balliboy Street, Newtownards	Not started	0	4	Not started	0	4	Y LA06/2022/0323/F	
449926	Lands immediately North of 10-18 Cambourne View and 17 Cambourne Park, Newtownards	Not started	0	9	Not started	0	9	Y LA06/2024/0273/RM	

## **Appendix 4: Housing Trajectory**

	Site Ref	Location	ANDBC Figures (Housing Monitor 2023/2024)			Turley Figures (Site Visits Dec 2025)			Turley Estimated Trajectory (2025-2032)							Estimated Yield by 2032	Difference between AND and Turley Yield	
			Development Status	Housing Units Complete	Remaining Potential	Development Status	Housing Units Complete	Remaining Potential	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32			
	14135	62-64 South Street	Ongoing	36	126	Complete	69	0	0	0	0	0	0	0	0	0	0	-126
	30062	Lands at Marm Factory Site, 20 Comber Road	Not started	0	236	Not started	0	236	0	0	0	0	0	0	0	0	0	-236
	30065	Lands at Ballyreagh (NS19)	Not started	0	675	Not started	0	675	0	0	25	50	50	50	50	225	0	-450
	13149	38 & 40 North Road BT23 7AS	Ongoing	14	12	Not started	0	22	0	22	0	0	0	0	0	22	0	10
	13407	Ash Grove/Kalmia Avenue	Ongoing	7	9	Ongoing	7	20	0	20	0	0	0	0	0	20	0	11
	13584	Mountpleasant, Lands to the rear of No's 1-29 Old Belfast Road	Ongoing	50	70	Ongoing	71	0	0	0	0	0	0	0	0	0	0	-70
	13588	Lands to rear of 29 Old Belfast Road Newtownards Co Down BT23 4S	Not started	0	5	Not started	0	5	0	5	0	0	0	0	0	5	0	0
	13857	Lands at Movilla Road	Not started	0	24	Not started	0	24	0	4	20	0	0	0	0	24	0	0
	13858	Lands at Old Shore Road	Not started	0	16	Not started	0	16	0	0	16	0	0	0	0	16	0	0
	13859	Lands at Talbot Street	Not started	0	22	Not started	0	22	0	0	22	0	0	0	0	22	0	0
	13861	Lands to the rear of Nos 1-7 Brooklands Avenue & Brooklands Park, Nos 2-24 Alder Grange Park & 57-63 Manse Road	Complete	43	0	Complete	43	0	0	0	0	0	0	0	0	0	0	0
	13863	Lands adjacent to Wyndell Park and Wyndell Court (NS20)	Ongoing	273	883	Ongoing	279	876	35	35	35	35	35	35	35	245	0	-638
	13864	Lands north of 262 Bangor Road, Beverley Way/Walk (NS21)	Ongoing	30	464	Ongoing	78	416	50	50	50	50	50	50	50	350	0	-114
	13865	Bowtown Road	Not started	0	69	Not started	0	69	0	10	25	25	9	0	0	69	0	0
	13866	Lands at nos 34a-36 North Road and east of laneway to Whitespots	Ongoing	32	50	Ongoing	71	10	10	0	0	0	0	0	0	10	0	-40
	13868	Lands surrounding 8 Tullynagard Road	Ongoing	105	11	Complete	108	62	25	25	12	0	0	0	0	62	0	51
	14022	130/132 Frances Street	Ongoing	6	4	Not started	0	11	0	11	0	0	0	0	0	11	0	7
	449725	Bowtown Road	Not started	0	10	Not started	0	10	0	10	0	0	0	0	0	10	0	0
	449728	Lands at 20-22 Regent Street & 15-19 Mill Street	Not started	0	23	Not started	0	23	0	0	0	0	0	0	0	0	0	-23
	449760	Land to west of Kiltonga Estate access, south of Old Belfast Road	Not started	0	20	Not started	0	20	0	0	25	4	0	0	0	29	0	9
	449823	Land south of 37-77 Court Street	Ongoing	0	108	Ongoing	50	45	25	20	0	0	0	0	0	45	0	-63
	449927	The Pub, 90 Upper Greenwell Street	Not started	0	16	Not started	0	16	0	6	10	0	0	0	0	16	0	0
	7626	Lands to east of Teal Rocks Pottery Road (NS22)	Ongoing	16	105	Ongoing	45	50	25	25	0	0	0	0	0	50	0	-55
	7643	Lands at former Kiltonga House, Belfast Road	Not started	0	60	Not started	0	60	0	0	10	14	0	0	0	24	0	-36
	12665	Site adjacent to (& east of) No 32 Belfast Road Newtownards	Not started	0	2	Ongoing	1	1	0	0	0	0	0	0	0	1	0	-1
	13157	52 Scrabo Road, Ballyculen, Newtownards,	Not started	0	3	Not started	0	3	0	0	3	0	0	0	0	3	0	0
	13431	196 Upper Greenwell Street, Newtownards	Not started	0	5	Not started	0	5	0	5	7	0	0	0	0	12	0	7
	13443	24 North Road and lands to the rear of Nos 26 & 28 North Road	Not started	0	9	Not started	0	9	0	0	9	0	0	0	0	9	0	0
	13446	18/20 Victoria Avenue, Newtownards	Ongoing	4	5	Ongoing	4	5	0	0	0	0	0	0	0	5	0	0
	13456	Site to the immediate rear and within the curtilage of 57B Crawfordsburn Road	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	14073	7 Westmount Park Newtownards Co Down	Not started	0	4	Not started	0	4	0	4	0	0	0	0	0	4	0	0
	14078	2A Mark Street	Complete	8	0	Complete	8	0	8	0	0	0	0	0	0	8	0	8
	14180	16-24 High Street and 16-20 Conway Square Newtownards	Not started	0	5	Not started	0	5	0	0	5	0	0	0	0	5	0	0
	14199	15 Sunderland Park Newtownards BT23 4RQ	Not started	0	2	Not started	0	2	0	0	2	0	0	0	0	2	0	0
	14205	28 Mountain Road Newtownards	Complete	1	0	Complete	1	0	1	0	0	0	0	0	0	1	0	1
	7627	Lands at no. 28 Portaferry Road	Not started	0	18	Not started	0	18	0	0	0	18	0	0	0	18	0	0
	30010	20 metres North of no. 98 Comber Road, Newtownards	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	30038	41-43 Court Street, Newtownards, BT23 7NX	Not started	0	2	Not started	0	2	0	0	2	0	0	0	0	2	0	0
	30041	49 Court Street, Newtownards, BT23 7NX	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	449744	Vacant land to the rear of 58 South St Newtownards	Not started	0	5	Not started	0	5	0	0	5	0	0	0	0	5	0	0
	449764	55A James Street Newtownards	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	449784	North-east of 8 Frederick Place, Newtownards	Not started	0	4	Not started	0	4	0	0	4	0	0	0	0	4	0	0
	449802	58 Frances Street, Newtownards	Ongoing	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	449807	27 Movilla Street, Newtownards	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	449808	35 Manse Road, Newtownards	Not started	1	0	Not started	1	0	0	1	0	0	0	0	0	1	0	1
	449827	Land immediately SE of 3 Manse Road, Newtownards	Not started	0	1	Not started	0	1	0	1	0	0	0	0	0	1	0	0
	449844	Lands to the rear of 71-79 South Street Newtownards	Not started	0	6	Not started	0	6	0	0	9	0	0	0	0	9	0	3
	449849	Rear garden of 30 Mountain Road Newtownards	Not started	0	2	Not started	0	2	0	0	2	0	0	0	0	2	0	0
	449867	Site at Lamont Avenue to rear of Nos 13-23 Portaferry Road Newtownards	Not started	0	5	Not started	0	2	0	0	2	0	0	0	0	2	0	-3
	449908	Lands North of 110d Movilla Road, Newtownards	Ongoing	0	8	Complete	8	0	8	0	0	0	0	0	0	8	0	0
	449911	118 Movilla Road and lands between 118 Movilla Road and 1 Millford Manor	Ongoing	0	8	Complete	8	0	8	0	0	0	0	0	0	8	0	0
	449913	4 Movilla Road, Newtownards	Not started	0	5	Not started	0	5	0	0	5	0	0	0	0	5	0	0
	449916	Movilla Gospel Hall, 58 Movilla Road, Newtownards	Not started	0	5	Not started	0	5	0	0	5	0	0	0	0	5	0	0
	449923	Land at the rear of 1-3 Balfour Street, Newtownards	Not started	0	4	Not started	0	4	0	0	4	0	0	0	0	4	0	0
	449926	Lands immediately North of 10-18 Cambourne	Not started	0	9	Not started	0	9	0	0	9	0	0	0	0	9	0	0
	449932	57 Donard Avenue Newtownards	Not started	0	2	Not started	0	2	0	0	2	0	0	0	0	2	0	0
	449936	48 North Road	Not started	0	1	Not started	0	2	0	2	0	0	0	0	0	2	0	1
	<b>TOTALS</b>			<b>626</b>	<b>3144</b>		<b>882</b>	<b>2795</b>	<b>201</b>	<b>258</b>	<b>329</b>	<b>196</b>	<b>144</b>	<b>135</b>	<b>135</b>	<b>1398</b>	<b>-1746</b>	
Ards Development Opportunity Sites	DOS NS 3	Harford Inn, West Street and 39 Regent Street	Not started	0	64	Not started	0	64	0	0	0	0	0	0	0	0	0	0
	DOS NS 5	31-33 West Street	Not started	0	16	Not started	0	16	0	0	0	0	0	0	0	0	0	0
	DOS NS 9	23a East Street and 1 Princes Lane	Not started	0	15	Not started	0	15	0	3	10	0	0	0	0	13	0	2
	DOS NS 16	22 and 24 Court Street	Not started	0	9	Not started	0	9	0	0	0	0	0	0	0	9	0	0
<b>TOTALS</b>			<b>0</b>	<b>104</b>		<b>0</b>	<b>104</b>	<b>0</b>	<b>3</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>2</b>	
Ards Urban Capacity Sites	1	Units 1-5 Lansdowne Industrial Estate, Lansdowne Road	Not started	0	10	Not started	0	10	0	0	0	0	0	0	0	0	0	0
	2	10 Comber Road, Newtownards	Not started	0	41	Not started	0	41	0	0	0	0	0	0	0	0	0	0
	3	10-12 Windsor Avenue	Not started	0	12	Not started	0	12	0	0	0	0	0	0	0	0	0	0
	6	24 Mountain Road	Not started	0	8	Not started	0	8	0	0	0	0	0	0	0	0	0	0
	8	167, 169, 175 & 183 Bangor Road	Not started	0	75	Not started	0	75	0	0	0	0	0	0	0	0	0	0
	11	Rear of 45-56 Bangor Road	Not started	0	22	Not started	0	22	0	0	0	0	0	0	0	0	0	0
	12	28 Bangor Road	Not started	0	5	Not started	0	5	0	0	0	0	0	0	0	0	0	0
	13	36-44 Donaghadee Road	Not started	0	25	Not started	0	25	0	0	0	0	0	0	0	0	0	0
	16	80 Bowtown Road and Land immediately to the east	Not started	0	20	Not started	0	20	0	0	0	0	0	0	0	0	0	0
	17	1 & 3 Old Movilla Road	Not started	0	14	Not started	0	14	0	0	0	0	0	0	0	0	0	0
	18	20, 22 & 22a Portaferry Road	Not started	0	45	Not started	0	45	0	0	0	0	0	0	0	0	0	0
	19	2E Portaferry Road	Not started	0	7	Not started	0	7	0	0	7	0	0	0	0	7	0	0
	20	Land at Lamont Avenue	Not started	0	32	Not started	0	32	0	5	0	0	0	0	0	5	0	0
	21	Former site of Castle Gardens Primary School, Portaferry Road	Not started	0	43	Not started	0	43	0	0	0	0	0	0	0	0	0	0
	23	51 & 53 Corry Street	Not started	0	10	Not started	0	10	0	0	0	0	0	0	0	0	0	0
	24	Land to the rear of 73-85 William Street	Not started	0	13	Not started	0	13	0	0	0	0	0	0	0	0	0	0
<b>TOTALS</b>			<b>0</b>	<b>382</b>		<b>0</b>	<b>382</b>	<b>0</b>	<b>5</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>0</b>	<b>0</b>	
Miscell (see per Table 18 Housing Tech Site 2)				<b>0</b>	<b>486</b>		<b>0</b>	<b>486</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>66</b>	<b>486</b>	<b>0</b>	
GRAND TOTAL									271	336	416	266	214	205	201			
Newtownards trajectory																		
			2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	Total								
Adjusted Annual Requirement up to 2031/32			421		421	421	421	421	421	2,947								
Turley Estimated Delivery			271		336	416	266	214	205	201	1909							

in year difference (shortfall)	-156	-85	-8	-155	-207	-216	-220	-1038
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## **Appendix 5: Newtownards: Constraint Mapping**

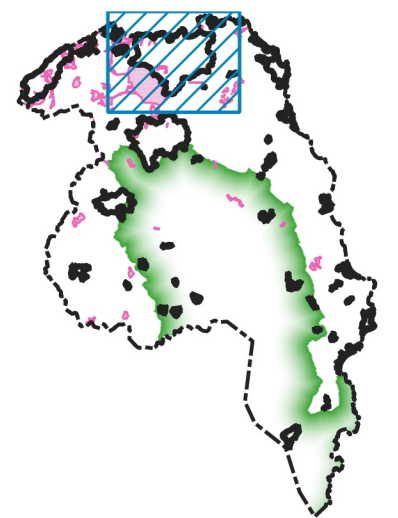


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- Local Wildlife Sites
- Area of Outstanding Natural Beauty
- Settlement Boundaries
- Landscape Wedge
- Local Landscape Policy Area



CLIENT:  
Lesley Bloomfield

PROJECT:  
ANDBC Rep - Lesley Bloomfield

DRAWING:  
Bangor Settlement Atlas

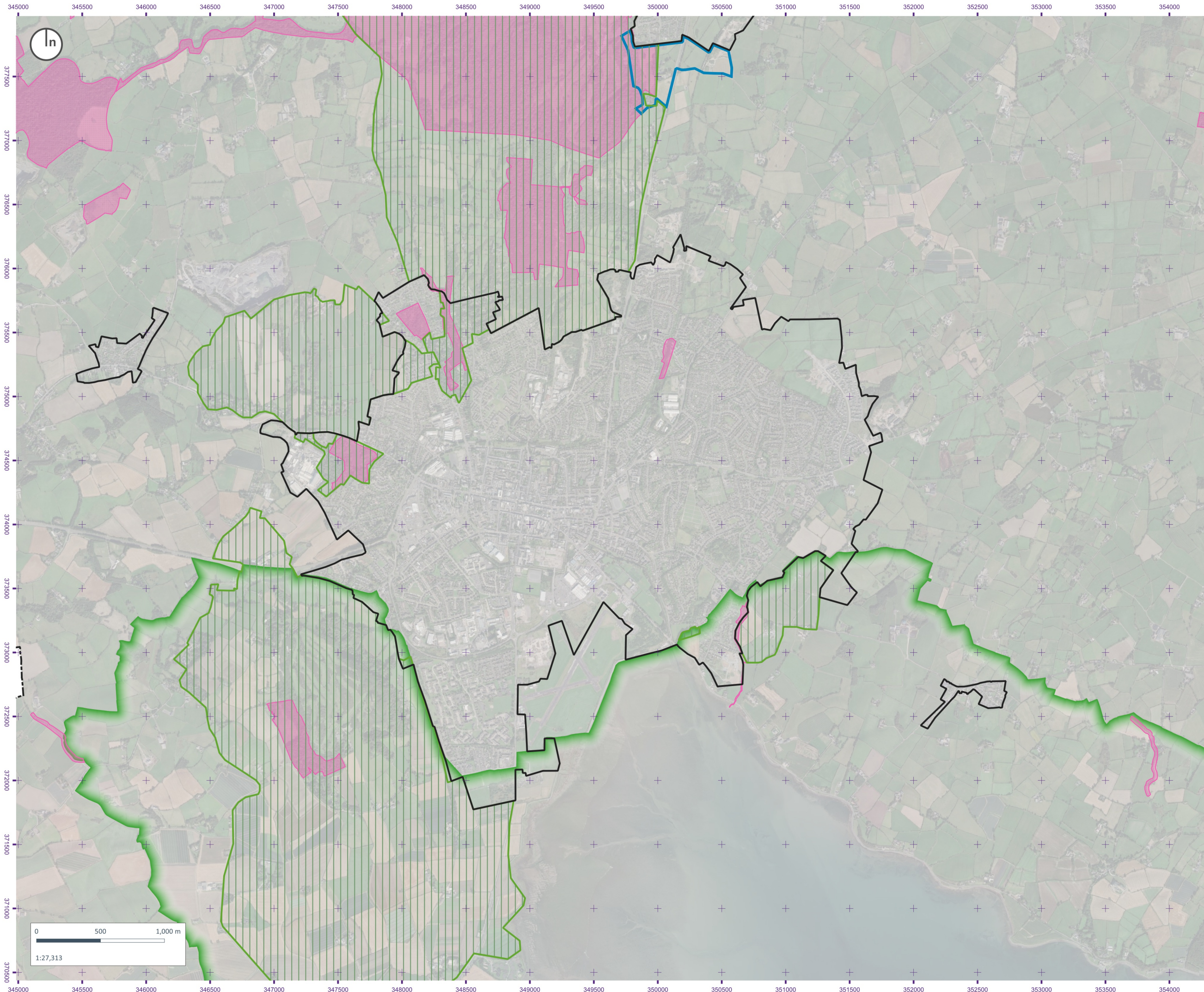
PROJECT NUMBER:  
04526

DRAWING NUMBER: GIS\_100\_  
CHECKED BY: NS

REVISION: 1.0  
STATUS: Draft

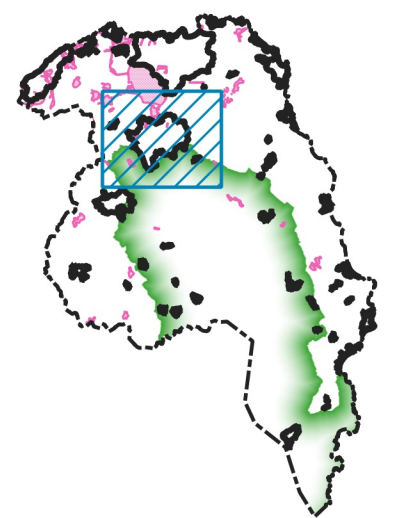
DATE: December 2025  
SCALE: 1:30,251.7 @ A3





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



CLIENT: \_\_\_\_\_  
 Lesley Bloomfield

PROJECT: \_\_\_\_\_  
 ANDBC Rep - Lesley Bloomfield

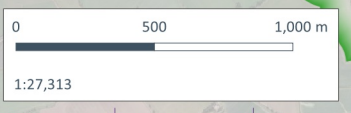
DRAWING: \_\_\_\_\_  
 Newtownards Settlement Atlas

PROJECT NUMBER: \_\_\_\_\_  
 04526

DRAWING NUMBER: \_\_\_\_\_ CHECKED BY: \_\_\_\_\_  
 GIS\_100\_ NS

REVISION: \_\_\_\_\_ STATUS: \_\_\_\_\_  
 1.0 Draft

DATE: \_\_\_\_\_ SCALE: \_\_\_\_\_  
 December 2025 1:27,313 @ A3



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