

## Local Development Plan, draft Plan Strategy (DPS) Consultation - Survey

### Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

### Formal Consultation period

**The Statutory Consultation period opens on 17 October 2025 and closes at 4.30pm on 15th December 2025**

Responses to be returned to the LDP team at

2 Church Street , Newtownards BT23 4AP

or by email to [planning@ardsandnorthdown.gov.uk](mailto:planning@ardsandnorthdown.gov.uk)

Respondents should note that any representations should be made in full to the Council. Further information or clarification will not be sought unless requested by an independent examiner.

### Soundness

A key feature of the local development plan system is 'soundness' which requires the development plan document to be tested in terms of content, conformity and the process by which it is produced, at independent examination (IE).

The tests of soundness are based upon three categories which relate to how the development plan document (DPD) has been produced, the alignment of the DPD with central government regional plans, policy and guidance, and the coherence, consistency and effectiveness of the content of the DPD.

More information on Soundness is available : [Development Plan Practice Note 6 Soundness](#) .

## Tests of Soundness

The tests of 'Soundness' for Development Plan documents are as follows:

### Procedural tests

P1 - Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

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

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

### Consistency tests

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

C2 - Did the Council take account of its Community Plan?

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

C4 - Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?

### Coherence and effectiveness tests

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

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

CE3 - There are clear mechanisms for implementation and monitoring.

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

1. **Name:**

David Donaldson

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2. **Address**

50a HIGH STREET

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HOLLYWOOD

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3. **Post Code** (optional)

BT18 9AE

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4. **Email** (optional)

david@donaldsonplanning.com

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5. **Phone Number** (optional)

07920873600

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

*\*Choose exactly 1 option*

No

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

*\*Choose exactly 1 option*

Yes

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

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DONALDSON PLANNING LTD

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

*\*Choose exactly 1 option*

No

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

N/A

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**11. Do you wish to upload a document to add to your survey response? (optional)**

Please note the maximum size of files that can uploaded is 50MB

*This field cannot be completed on paper. Please use the online version of this form instead.*

**YES – SEE ATTACHED SUBMISSION DD17**

**12. Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.**

Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

*\*Choose exactly 1 option*

**X Oral Hearing** (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.

**13. Soundness of the Plan (optional)**

**Do you believe the draft Plan Strategy is sound?**

*\*Choose exactly 1 option*

X No

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

CE1 AND CE2

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**15. Procedural Tests - (optional)**

**P1 Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?**

*\*Choose exactly 1 option*

X Yes

**16. Test P1 Comments (optional)**

N/A

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

*\*Choose exactly 1 option*

X Yes

**18. Test P2 Comments** (optional)

N/A

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

*\*Choose exactly 1 option*

X Yes

**20. Test P3 Comments** (optional)

N/A

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**21. P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD** (optional)

*\*Choose exactly 1 option*

X Yes

**22. Test P4 Comments** (optional)

N/A

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**23. Consistency Tests** (optional)

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

*\*Choose exactly 1 option*

X

Yes

**24. Test C1 Comments** (optional)

N/A

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

*\*Choose exactly 1 option*

X Yes

**26. Test C2 Comments** (optional)

N/A

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

*\*Choose exactly 1 option*

X Yes

**28. Test C3 Comments** (optional)

N/A

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**29. C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district?** (optional)

*\*Choose exactly 1 option*

X Yes

**30. Test C4 Comments** (optional)

N/A

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**31. Coherence and Effectiveness Tests** (optional)

**CE 1 The DPD sets out coherent strategy, from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils?**

*\*Choose exactly 1 option*

No

**32. Test CE 1 Comments** (optional)

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**33. CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**  
(optional)

*\*Choose exactly 1 option*

No

**34. Test CE 2 Comments** (optional)

SEE WRITTEN SUBMISISON

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

*\*Choose exactly 1 option*

No

**36. Test CE 3 Comments** (optional)

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**37. CE 4 It is reasonably flexible to enable it to deal with changing circumstances?** (optional)

*\*Choose exactly 1 option*

No

**38. Test CE 4 Comments** (optional)

SEE WRITTEN SUBMISSION

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**39. If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound.** (optional)

SEE ATTACHED DOCUMENT

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**40. Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy?** (optional)

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**41. Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)**  
(optional)

Do you have any comments?

N/A

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

Do you have any comments on the draft HRA?

N/A

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**43. Equality Impact Screening Report** (optional)

Do you have any comments on the EQ screening?

N/A

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**44. Rural Needs Impact Assessment** (optional)

Do you have any comments on the RNIA?

N/A

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**45. Please add any additional comments** (optional)

N/A

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## **What Happens Next?**

Thank you for your representation to the Local Development Plan draft Plan Strategy (dPS).

**You will receive a formal acknowledgement letter from the Council's Planning Department . We will issue this within 5 working days of your response.**

This is in addition to the acknowledgement auto-generated by the Go Vocal system.

Representations received during the public consultation stages of the Plan Strategy and Local Policies Plan, must be made available for public inspection, both in hard copy, and on the Council's website, as required by Legislation.

Representations will also be shared with an Independent Examiner such as the Planning Appeals Commission and the Department for Infrastructure as part of the Local Development Plan Examination Process.

## DRAFT PLAN STRATEGY REPRESENTATION

### SUBJECT: POLICY HOU 3 AFFORDABLE HOUSING

This representation sets out why the proposed affordable housing policy is unsound, and how it should be amended.

Policy HOU3 is below:



#### Policy HOU 3 Affordable Housing

Planning permission will be granted for residential development of 5 housing units or more, or on a site of 0.1 hectares or more, where at least 20% of the units are affordable housing<sup>14</sup>.

Where there is an acute localised need as demonstrated by the Northern Ireland Housing Executive (NIHE), the proportion required may be uplifted on an individual site.

Provision for affordable housing will also be made on sites zoned for housing in the Local Policies Plan, and key site requirements (KSRs) may be applied to supplement the delivery of affordable housing where necessary to meet local need.

Affordable housing shall consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, a statement of housing need provided by NIHE will be taken into account. If need in the local area has been met or has decreased, the requirement for affordable housing may be adjusted accordingly.

Development proposals which contain less than 5 housing units where lands have been artificially divided for the purposes of circumventing the policy requirements will not be permitted.

Where there is a phased approach to the development of a site, this should be discussed with the Council at the outset and a Concept Master Plan provided to ensure that the affordable housing requirement can be developed in a comprehensive way over the whole scheme.

The design, external finishes and appearance of affordable housing in the development shall reflect the character of the remainder of the housing on the site. The affordable housing units shall be interspersed throughout the site so that they are not readily distinguishable. Planning permission will be refused where schemes do not provide effective integration of affordable housing elements in new developments.

The delivery of affordable housing will be secured by planning condition or a Section 76 planning agreement which should be in place in advance of planning permission being granted.

Where it can be demonstrated that it is not viable or practicable for a proposed development to meet the above policy requirements in full, the Council will consider acceptable alternatives on a case-by-case basis.

All proposals for residential development must comply with General Principles policy GP1 and all other relevant policy provisions of the LDP.

The introduction of an affordable housing policy is in accordance with the RDS and the SPSS.

The PS proposal to require affordable housing at a threshold of 20% of the units is not unreasonable.

However the detailed requirements of Policy HOU 3 render it **unsound** for development management purposes.

It is written in a way that will require affordable housing for '**residential development of 5 units or more, OR** (my emphasis) **on a site of 0.1 hectares or more.**'

This is unsound for several reasons.

**First**, the threshold of 5 units is very low. This would require one affordable unit within a small development of 5 houses. Not only will this result in additional administration to implement (via S76 agreements etc) but multiple small schemes are unlikely to make any meaningful contribution to the significant social/affordable need within the Borough of nearly 1400 units (Table 4 TS2):

**Table 4: Five Year Projected Social Housing Need 2023-28 (Source: Commissioning Prospectus, NIHE)**

Settlement	Housing Need Assessment Area	Total 5 Year Projection
Newtownards Town	Newtownards Town	209
Bangor Urban	Bangor Urban	600
Holywood	Holywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomsport	Groomsport	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) <sup>13</sup>		40
<b>Total</b>	<b>Ards and North Down</b>	<b>1,390</b>

**Second**, and more fundamentally, the threshold of an affordable housing requirement on sites of **0.1 ha or more** is unworkable. Much of the housing supply in towns such as Bangor and Holywood has historically come from small 'one-off' developments, often on generous plots which are required to respect the local character.

In addition, small sites of 0.1 hectare are only likely to yield about 2 dwellings (at a density of 20dph) unless they are in inner urban locations and are suitable for higher density apartment type development. In many residential areas throughout the Borough (eg Holywood) a 0.1 ha site might not even be capable of accommodating a single dwelling. How could such small sites deliver any meaningful level of affordable housing?

The only way in which delivery of affordable or social housing is likely to occur in any meaningful numbers is if specific and uncommitted sites are identified within the Local Policies Plan. This will especially be the case in Bangor, where so much of the housing land is already built upon or committed.

**Third**, the proposed policy is inconsistent with the policies in neighbouring Councils. For example in Lisburn the site area threshold is 0.5ha and in NMDDC it is 0.5 for the larger towns and 0.2 for smaller settlements:

## HOU10 Affordable Housing in Settlements

Where the need for Affordable Housing is identified, through the Housing Needs Assessment<sup>10</sup>, on sites of more than 0.5 hectares or comprising of 5 residential units or more, proposals will only be permitted where provision is made for a minimum 20% of all units to be affordable. This provision will be secured and agreed through a Section 76 Planning Agreement.

### Lisburn Plan Strategy

Planning permission will only be granted for residential development proposals subject to the following criteria:

- a Within Newry City and the district's towns, on sites of 0.5ha or comprising of 10 units or more, provision should be made for a minimum of 20% affordable housing; or
- b Within the district's villages and small settlements, on sites of 0.2ha or comprising of 5 residential units or more, provision should be made for a minimum 20% affordable housing.

### NMDDC Draft Strategy

It is also worth noting that in the Adopted Antrim and Newtownabbey Plan Strategy the threshold for affordable developments is 40 houses or more.

**Fourth**, the reference in the policy to a potential uplift in the proportion being required if an '*acute localised need*' is identified by the NIHE is inconsistent with the SPPS principle that development plans should provide a measure of certainty. Furthermore, NIHE is not the planning authority.

**As proposed, draft Policy HOU3 is unsound, unworkable and unlikely to deliver the objectives.**

**It fails the CE1 to CE4 tests of coherence and effectiveness.**

## How should it be amended?

The thresholds for affordable housing provision should be increased to proposals of at least 10 units, or on sites of 1ha or more.

Alternatively there should be an exception to the requirement for developments of less than 5 dwellings where the proposed plot sizes are demonstrated to be consistent with the character and density of the local area.

The reference to a potential uplift in the requirement if a localised acute need is identified by NIHE should be removed on the basis that it will create uncertainty for prospective developers.

**DONALDSONPLANNING LTD**

**50A High Street**

**HOLYWOOD**

**BT18 9AE**

**December 2025**