

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

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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07920873600

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

**Choose exactly 1 option*

No

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

MR HOLLINGER

C/O AGENT

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

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

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

YES – SEE ATTACHED DD09

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

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

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

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

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

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

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

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

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

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*

X No

32. Test CE 1 Comments (optional)

SEE SUBMISSION DD 09

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)

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

**Choose exactly 1 option*

No

35. Test CE 3 Comments (optional)

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

**Choose exactly 1 option*

No

37. Test CE 4 Comments (optional)

38. 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 DD09

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

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

Do you have any comments?

N/A

41. draft Habitats Regulations Assessment(HRA) (optional)

Do you have any comments on the draft HRA?

N/A

42. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

43. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

44. Please add any additional comments (optional)

N/A

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.

REF:DD09

REPRESENTATION TO DRAFT PLAN STRATEGY ON BEHALF OF MR HOLLINGER

SUBJECT: SPATIAL GROWTH STRATEGY AND LANDS AT KILTONGA, NEWTOWNARDS

1.0 Introduction

1.1 This representation is in relation to the Draft Plan Strategy (DPS). It relates specifically to lands at Kiltonga, Newtownards.

1.2 The submission sets out the reasons why the Plan Strategy should allocate additional housing and employment lands at Kiltonga to meet requirements in Newtownards.

2.0 Plan Objectives

2.1 The DPS sets out a number of key objectives, including the following:



Spatial and Cross-cutting Objectives

Promote sustainable growth in the right places and at the appropriate level, to meet the needs of all those who live, work, visit and invest in the Borough.

A Healthy and Safe Place

1.123 By 2032, healthy and safe sustainable communities have been created with a mix of housing types and tenures in suitable locations - including accessible and affordable homes. Communities offer a good range of community facilities with access to jobs, key services and infrastructure, thereby reducing the need to travel. Opportunities are realised to promote the active participation of residents of all age groups in physical and cultural activity and to enjoy good health and wellbeing.



Social Objectives

To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.



Infrastructure Objectives

To support more sustainable movement patterns by promoting a mix of land use allocations in accessible locations alongside improved digital connectivity, whilst providing opportunities for active travel and integrated sustainable transport above use of the private car.



Economic Objectives

To support a thriving, well-connected, diverse economy to enable and encourage business growth and attract inward investment and businesses in appropriate growth sectors.

To support the Council's ambition of employment growth through the provision of accessible land for employment, including for start-ups and grow-on spaces in a choice of sites at a range of locations.

- 2.2 The Plan Strategy must set out policies and allocations to support the above objectives.

Spatial Growth Strategy

- 2.3 SGS1 sets out the Council's growth ambitions:

SGS 1: Spatial Growth Strategy

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;

- Consolidate and strengthen the role of Holywood as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough;
- Consolidate the role and function of the small towns of Comber and Donaghadee as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands;
- Consolidate Portaferry as a new small town within the settlement hierarchy to reinforce its role and function as an important local centre for housing, employment, facilities and other services serving the rural hinterland of the Ards Peninsula;
- Sustain and maintain the diversity and quality of our villages by encouraging local development which supports the population and services of local communities; and
- Sustain and maintain our rural communities in small settlements and the countryside by facilitating sustainable development of an appropriate scale and character that affords protection to rural character and our rich natural environment.

- 2.4 The identification of Bangor and Newtownards as the major growth locations is welcomed. This is also identified in the Settlement Hierarchy, below:

SGS 2: Settlement Hierarchy

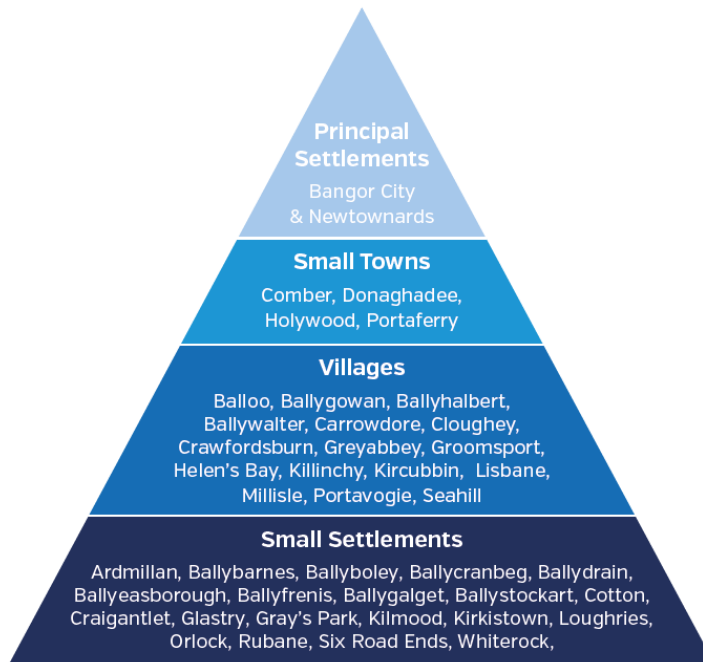


Figure 3: Settlement Hierarchy

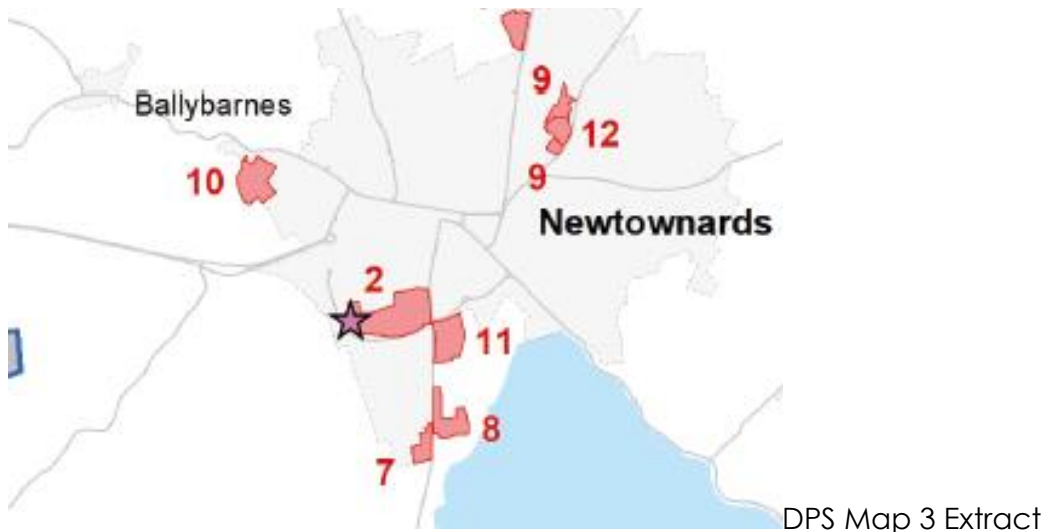
- 2.5 SGS 3 sets out the strategic approach to the allocation of economic development land:

SGS 3: Strategic Allocation of Economic and Industrial Development Land

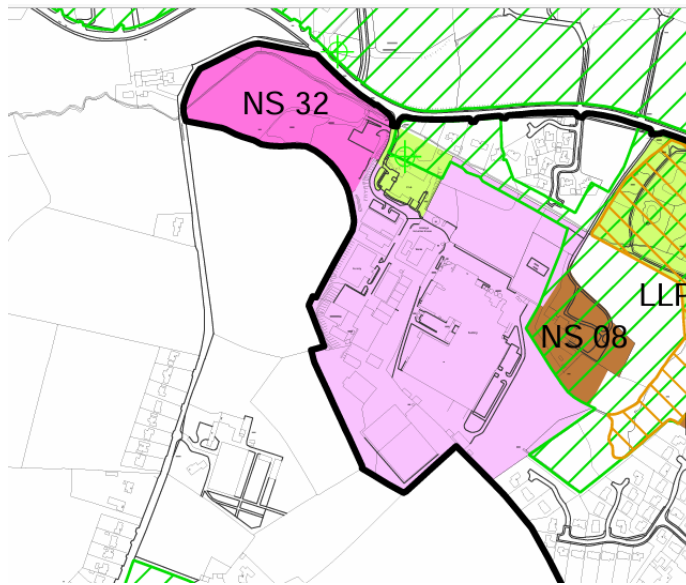
- Allocate a minimum of 25 hectares of land for economic development purposes, focussed upon the principal settlements and most accessible locations;
- Support and promote Strategic Employment Locations as the preferred employment locations in the Borough;
- Support and promote zoned employment sites throughout the Borough to provide opportunities for a range of economic needs and businesses including business startups and Small to Medium Enterprises (SMEs);
- Provide a spatial framework for the application of economic development policies, intended to deliver sustainable and environmentally sensitive economic growth across the Borough, including rural areas; and
- Monitor the uptake of employment lands to ensure that the LDP maintains a 5-year supply.

- 2.6 The allocation of a **minimum of 25 ha** for economic and industrial development, focused upon the principal settlements, is **sound**.
- 2.7 The proposal to introduce Strategic Employment Locations is also sound.

- 2.8 However in this respect it is interesting that it has identified Balloo Industrial Estate in Bangor and Jubilee Road, Newtownards as SELs at this Plan Strategy stage.
- 2.9 The Strategy should not rule out the identification of a further SEL at Local Policies stage, especially as it is noted from Table 3 that Jubilee Rd has **only 3.61 ha** remaining undeveloped. This can hardly be regarded as 'strategic'.
- 2.10 Paragraph 2.37 sets out the justification for an oversupply. It includes an allowance for unexpected growth; flexibility of choice; and allowance for non-delivery of sites. Whilst over provision may be acceptable, it is important for the Plan to have regard to the reasons *why* existing zoned sites may not have delivered upon their employment potential.
- 2.11 It is significant to note that much of the oversupply is concentrated upon a single site – draft BMAP zoning BR06 at Newtownards Road Bangor of 17 ha, which remains undeveloped.
- 2.12 Table 3 in the DPS sets out the various employment locations in Bangor and Newtownards. In Newtownards there are a number of small pockets of undeveloped employment land, primarily at Comber Road. These are indicated on Map 3 of the DPS (extract below):



- 2.13 Significantly, whilst the Kiltonga Industrial Estate is coloured in Map 3 of the DPS (No 10 above), only the site at 'South of Belfast Road and East of Milecross Road' (NS32) is noted in the Table, with 2.97 ha 'undeveloped'. NS32 is shown in the ADAP extract below:



ADAP Map 3 Extract

- 2.14 Two important factors arise from this. First, the large employment area at Kitonga (zoned as existing employment in ADAP) is not highlighted as an employment location (even though this site is intensively developed). Second, the 2.97 ha proposed NS32 zoning has not been recognised as having extant approvals for an hotel, care home and now retirement housing. Plainly this site will not make a contribution to employment.
- 2.15 The Plan should ensure that there is a good range and choice of employment sites. The designation of additional land at Kiltonga would provide important scope for the expansion of the existing employment facilities, and would also ensure that there is a good distribution of sites, and especially on the Belfast side of the town.
- 2.16 With the established offices and the previous approval of a garden centre at Milecross Road (X/2012/0337/RM) the subject lands would be particularly suitable for small 'hi-tech' business units as well as some 'live-work' type units.

Strategic Housing Allocation

- 2.17 SGS4 sets out the allocation for the Plan:

SGS 4: Strategic Housing Allocation

- Allocate 15,608 new homes to meet housing need and support job creation over the Plan period;
- Manage housing growth to achieve sustainable patterns of residential development across the Borough [see SGS 5: Strategic Housing Allocation across settlements]; and
- Management of the release of housing land to ensure the LDP maintains a 5-year supply throughout the Plan period [see SGS 6].

The allocation of 15,608 homes is supported.

2.18 SGS5 sets out the proposed allocations, with 3,381 allocated to Newtownards:

SGS 5: Strategic Housing Allocation across settlements

Table 6:
Strategic Housing Allocation across settlements⁸

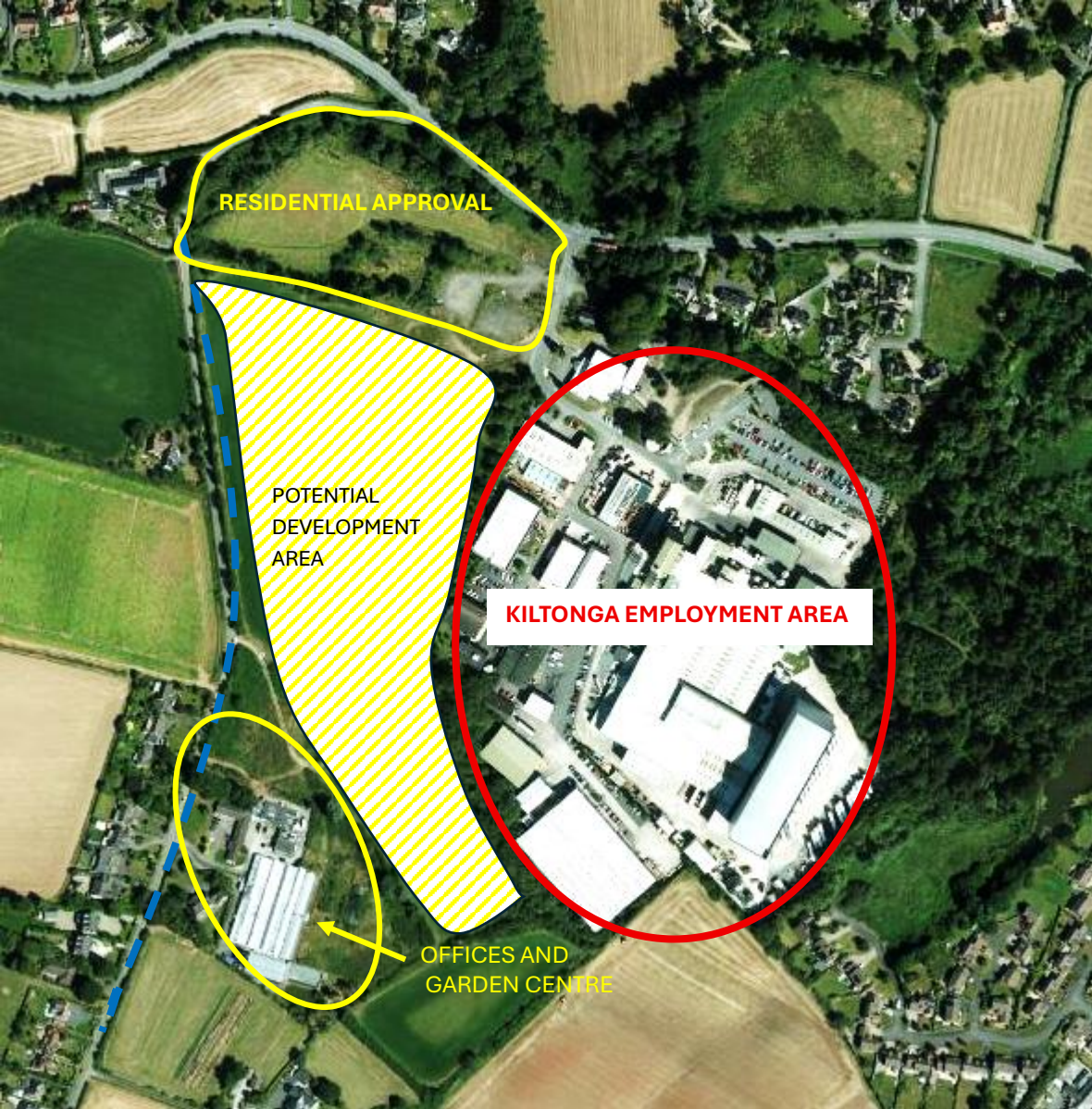
	Potential Housing Supply (units)				
	Housing Allocation 2017-2032	Existing Commitments	Urban Capacity Potential	Windfall Allowance	Total Potential Housing Supply
Bangor	4,508	1,072	412	520	2,004
Newtownards	3,381	3,323	486	520	4,329
Comber	1,193	1,068	85	190	1,343
Donaghadee	795	522	34	150	706
Hollywood	398	210	23	120	353
Portaferry	398	176	75	70	321
Villages	1,265	1,076	-	690	1,766
Small Settlements	176	106	-	130	236
Countryside	535	302	-	-	302
Total	12,649	7,855	1,115	2,390	11,360

- 2.19 It is noted that Newtownards is indicated as having a potential supply of 4,329 houses, which should be sufficient to meet the proposed allocation. However much of this supply is concentrated upon the committed sites in the east of the town, where permissions have been granted and developments are well under way. The development of these areas has resulted in a physical imbalance in the town, whereby much of the housing is now a long distance east of the town centre.
- 2.20 The allocation of some land for housing at Kiltonga would help to meet the plan objectives in several ways (perhaps as part of a mixed use or 'live-work' community).
- 2.21 **First**, it will allow more flexibility and choice of housing locations.
- 2.22 **Second**, it will not contribute to congestion in the town centre.
- 2.23 **Third**, it will provide the potential to meet some of the identified social housing need in the town, which cannot be met by the already approved and committed private housing developments:

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
Hollywood	Hollywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomspoint	Groomspoint	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) ¹³		40
Total	Ards and North Down	1,390

- 2.24 The lands at Kiltonga are well placed to contribute to the Plan objectives for sustainable growth, including housing to meet a range of needs, and employment opportunities.
- 2.25 They are well located beside a successful employment area, and they are physically contained by Milecross Road.
- 2.26 The image below demonstrates how they can be allocated for employment and/or residential use, without any adverse impact upon local character or amenity:



3.0 Conclusions

3.1 The Plan Strategy should recognise the Kiltonga area as a location suitable for sustainable growth.

DONALDSONPLANNING LTD

December 2025