

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

2. **Address**

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3. **Post Code** (optional)

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david@donaldsonplanning.com

5. **Phone Number** (optional)

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*

No

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

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

**Choose exactly 1 option*

YES

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

MR HOLLINGER

C/O DONALDSON PLANNING LTD

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 SUBMISSION DD10

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*

No

32. Test CE 1 Comments (optional)

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 SUBMISSION

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

**Choose exactly 1 option*

No

36. Test CE 3 Comments (optional)

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 ATTACHED SUBMISSION

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

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

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

Do you have any comments?

N/A

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

Do you have any comments on the draft HRA?

N/A

43. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

44. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

45. 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:DD10

REPRESENTATION TO DRAFT STRATEGY RESPONSE ON BEHALF OF MR HOLLINGER

SUBJECT: DPS TOURISM POLICIES

The DPS chapter on 'Sustainable Tourism' sets out the Council's policies to promote the growth of sustainable tourism within the Borough:

Sustainable Tourism Strategy

The Local Development Plan's Tourism Strategy promotes sustainable tourism across Ards and North Down, allowing areas within the Borough to respond to tourist demand whilst safeguarding the integrity of the assets upon which the tourism draw depends.

A 'Tourism Hierarchy' is proposed, whereby 'priority', 'sensitive' and 'protected' areas are identified.

The **priority areas** include the settlements, urban waterfronts and town centres.

The **sensitive areas** include the countryside, the Strangford and Lecale AONB, LLPA's, conservation areas, ATCs and Historic Parks and Demesnes.

The **protected areas** are the undeveloped coastal zone; Nendrum ASAI; NED designated sites; and Craigantlet Area of High Scenic Value.

Table 9:
Tourism Hierarchy Areas

| Priority Area | Sensitive Area | Protected Area |
|------------------------------|--|--|
| Principal Settlements | Countryside ²⁰ | Ards and North Down Undeveloped Coastal Zone ²¹ |
| Within Settlements | Strangford and Lecale Area of Outstanding Natural Beauty (AONB) | Nendrum Area of Significant Archaeological Interest (ASAI) |
| Urban Waterfronts | Local Landscape Policy Areas (LLPAs) | Natural Environment designated sites |
| Town Centres | Conservation Areas | Craigantlet Area of High Scenic Value (AoHSV) |
| | Areas of Townscape Character (ATC) Areas of Village Character (AVC) | |
| | Quiet Area ²² Stricklands Glen ²³ | |
| | Historic Parks, Gardens and Demesnes | |


Policy TSM1 supports tourism within settlements. This is uncontentious.

Policy TSM2 refers to provision of tourist amenities in the countryside. These are defined as facilities or services, but not accommodation. This is generally uncontentious. However paragraph 12.20 is confusing. This refers to development within 'sensitive' areas (ie those areas which include the general countryside, AONBs etc) only being approved in exceptional circumstances, which appears to undermine TSM2 itself. Furthermore, it then goes on to refer to the Conservation (Natural Habitats etc) Regulations and the need for HRA. **This requires amendment or clarification.**

Policy TSM3 appears to remain very similar to the existing PPS16 provisions. It is noted that it will preclude new hotel development in the countryside, although this may potentially be considered under TSM4.

Policy TSM5 refers to self-catering accommodation. Again this is similar to PPS16, although the potential for farm diversification projects to contribute to self-catering accommodation should be promoted.

Policy TSM 6 refers to holiday parks and glamping:



Policy TSM 6 New and Extended Holiday Parks and Glamping Accommodation

Planning permission will only be granted for a new holiday park²⁷ or an extension to an existing facility in locations within Sensitive Areas, as defined in the Tourism Hierarchy, where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development.

The location, siting, size, design, layout, and landscaping of the holiday park proposal must be based on an overall design concept that respects the surrounding landscape, rural character, and site context.

Proposals for holiday park development must be accompanied by a layout and landscaping plan, and will be subject to the following specific criteria:

- (a) The site is located in an area that has the capacity to absorb the holiday park development, without adverse impact on visual amenity and rural character;
- (b) Effective integration into the landscape must be secured primarily through the utilisation of existing natural or built features. Where appropriate, planted areas or discrete groups of trees will be required along site boundaries in order to soften the visual impact of the development and assist its integration with the surrounding area;
- (c) Adequate provision (normally around 15% of the site area) is made for communal open space (including play and recreation areas and landscaped areas), as an integral part of the development;
- (d) The layout of caravan pitches / motor homes is informal and characterised by discrete groupings or clusters of units separated through the use of appropriate soft landscaping;
- (e) The design of the development, including the design and scale of ancillary buildings and the design of other elements including internal roads, paths, car parking areas, walls, and fences, is appropriate for the site and the locality, respecting the best local traditions of form, materials, and detailing;
- (f) Environmental assets including features of the archaeological and built heritage, natural habitats, trees, and landscape features are identified and, where appropriate, retained and integrated in a suitable manner into the overall design and layout; and

The wording of this policy is unclear in several respects.

Significantly, Policy TSM6 makes no mention of how proposed holiday park development will be assessed within either the 'priority' areas or the 'protected' areas. As written, it suggests that permission will 'only' be granted in sensitive areas. This cannot be correct.

Farm diversification only merits a short paragraph under TSM6, which cross references to Policy ED 8 'Farm Diversification' (The correct policy should be ED9). The Tourism Strategy, and TSM6 should both include specific reference to the potential for delivery of tourism development as a consequence of farm diversification projects.

The policy has a separate section for provisions in respect of glamping proposals:

Glamping Accommodation

Glamping accommodation units fall outside the definition of a caravan by virtue of the interpretation in the Caravan Sites Act (NI) 2011²⁸.

The following policy applies for Glamping accommodation

Planning permission will be granted for three or more glamping accommodation units within the Priority and Sensitive Areas, as defined in the Tourism Hierarchy, where one or all of the following criteria are met:

- (i) The glamping units are all located within the grounds of an existing or approved hotel, self-catering complex, guest house, holiday park; or
- (j) The glamping units are accepted as a form of farm diversification and they are grouped with existing buildings;
- (k) Where there is a locational need for glamping accommodation and the proposed development is integrated into the landscape.

Supporting evidence for any proposal should be proportionate to the size of the scheme.

All proposals for glamping accommodation must also comply with criteria (b) and (d) to (h) inclusive above.

Supporting evidence for any proposal should be proportionate to the size of the scheme.

The DPS comment that glamping does not fall within the definition of 'caravans' is wrong. Pods or huts which meet the appropriate size criteria in Section 15 of the Caravans (NI) Act 2011 (below) can be regarded as caravans:

Meaning of "caravan" in this Act

15—(1) In this Act "caravan" means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted, but does not include—

- (a) any railway rolling stock which is for the time being on rails forming part of a railway system for the time being in use as such;
- (b) any tent; or
- (c) a structure—
 - (i) which falls within subsection (2); and
 - (ii) any dimensions of which, when the structure is assembled, exceed a limit specified in subsection (3).

(2) A structure falls within this subsection if it is—

- (a) composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and
- (b) when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer).

(3) The limits referred to in subsection (1)(c)(ii) are—

- (a) length (exclusive of any drawbar): 20 metres;
- (b) width: 6.8 metres;
- (c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 3.05 metres.

(4) A structure which falls within subsection (2) is not excluded from being a caravan by reason only that when assembled it cannot lawfully be moved from one place to another on a road.

The policy for glamping accommodation should not be differentiated from the policy applicable to holiday parks. As proposed, it is unsound.

And within the 'sensitive' areas criteria (k) introduces a requirement for 'locational need' to be demonstrated. This is an unnecessary tightening of the well established policy under TSM6 of PPS16. It is unclear what information will be required to justify a locational need for this type of sustainable, low impact development.

It is also inconsistent with the less restrictive criteria which apply in the DPS for NMDDC:

A proposal for the provision of new, small-scale glamping accommodation or an extension to an existing site in the countryside will be permitted where it meets Policy TOU2 Tourist Amenities in the Countryside, and will be subject to the following specific criteria:

- a It is closely associated with a tourist asset or it is part of a farm diversification scheme;
- b The site positively contributes to the natural character, biodiversity and cultural heritage of the surrounding area;
- c The site fits unobtrusively within the landscape and is well screened by existing landscape features;
- d Ancillary facilities are provided by conversion of existing buildings (subject to compliance with Policy HE14). Where this is not possible, such facilities could be considered as ancillary to the accommodation, subject to other relevant policy considerations, including landscape impact;
- e The site is for short-term holiday accommodation only; and
- f The site has no more than five units of accommodation.

Justification and Amplification

Glamping sites provide the chance for the provision of sustainable tourist accommodation which immerses visitors in the natural landscape, biodiversity and cultural heritage of the district. Given the recent and continuing demand for such camping experiences and the low impact of the activity on the environment, this policy seeks to aid high-quality proposals in gaining permission.

NMDDC Plan Strategy

CONCLUSIONS

The Tourism Strategy is unsound under CE1 and CE2.

The wording of the Policy TSM6 should be clarified, to provide specific references to what may or may not be permitted in each aspect of the hierarchy.

TSM6 is also unduly restrictive and will not fulfil the policy objectives to promote sustainable tourism, including farm diversification opportunities.

Glamping accommodation should be determined under the same policies as holiday parks.

DONALDSON PLANNING

DECEMBER 2025