

## 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

---

**2. Address**

50a HIGH STREET

---

HOLLYWOOD

---

---

---

---

---

---

---

---

**3. Post Code (optional)**

BT18 9AE

---

**4. Email (optional)**

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*

Yes

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

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)

---

---

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.*

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*

**WRITTEN SUBMISSION**

.

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*

YES

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

**23. Consistency Tests** (optional)

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

*\*Choose exactly 1 option*

Yes

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

N/A

---

---

---

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

*\*Choose exactly 1 option*

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*

YES

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

**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*

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*

YES

**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)

**POLICY HOU17 IS UNSOUND AND WILL CREATE UNCERTAINTY.**

THE CLEAR INTENT IS TO TIGHTEN THE POLICY PROVISIONS AND TO PROHIBIT PERMISSIONS BEING GRANTED WHERE FARMS MAY BE SMALL IN SCALE OR WHERE THE APPLICANT MAY HAVE ONLY LIMITED ENGAGEMENT IN FARM ACTIVITIES.

HOWEVER AS DRAFTED IT IS INCONSISTENT WITH THE SPPS AND WILL CREATE UNCERTAINTY IT WILL RESTRICT OPPORTUNITIES FOR DWELLINGS ON FARMS WITHIN ANDBC COMPARED TO NEIGHBOURING DISTRICTS.

THE EVIDENCE BASE SHOWS THAT ONLY SMALL NUMBERS OF DWELLINGS ON FARMS ARE PERMITTED IN ANDBC IN ANY CASE.

**The phrase 'PERSONALLY AND SUBSTANTIALLY INVOLVED' is imprecise.**

IF AN APPLICANT HAS A DEMONSTRABLE FARM BUSINESS THEN HE OR SHE SHOULD NOT NEED TO BE LIVING ON THE LAND OR ACTUALLY DOING THE PHYSICAL WORK.

**SIMILARLY, WHAT DOES 'HOBBY FARM' MEAN?**

MANY SMALL FARMERS HAVE OTHER EMPLOYMENT, WITHOUT WHICH THEY COULD NOT SURVIVE. DOES THIS MAKE THEIR FARM A 'HOBBY FARM'? IF THEY COMPLY WITH THE EU DEFINITION OF 'ACTIVE FARMING' THEN THEY SHOULD BE ENTITLED TO FAIR CONSIDERATION UNDER THE POLICY.

---

---

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

*\*Choose exactly 1 option*

YES

**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*

YES

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

---

---

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)

POLICY HOU17 SHOULD BE REWORDED TO REMOVE REFERENCE TO 'PERSONALLY AND SUBSTANTIALLY INVOLVED.' IT SHOULD ALSO REMOVE THE UNNECESSARY REFERENCE TO 'HOBBY FARMING'.

---

---

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.