

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:**

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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*

No

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*

Yes

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

Gordonall Farms Greyabbey

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 DD06

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*

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*

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*

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)

N/A

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*

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)

See attached submission

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)

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)

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

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:DD06

REPRESENTATION TO DRAFT PLAN STRATEGY ON BEHALF OF GORDONALL FARMS

SUBJECT: SPATIAL GROWTH STRATEGY AND GREYABBAY

1.0 INTRODUCTION

- 1.1 This submission to the Draft Plan Strategy (DPS) is in relation to Greyabbey, on behalf of Gordonall Farms.
- 1.2 Gordonall Farms owns land on the north and western edges of Greyabbey, adjacent to the settlement. This land stretches from the A20 Newtownards Road to Carrowdore Road:



- 1.3 This representation is to the Spatial Growth Strategy and the absence of a specific housing allocation for Greyabbey (Section 3.0). In this respect there are a number of soundness concerns with the Draft Strategy.

Legislative Context for Representations

- 1.4 Part 2 of the Planning (NI) Act 2011 sets out the general requirements for local development plans. This states that the purpose of the Independent Examination is to determine whether: a) it satisfies the requirements relating to preparation of the DPD; and b) whether it is 'sound'.
- 1.5 The soundness tests relate to procedure; consistency; and coherence and effectiveness.

1.6 In relation to this submission, the **'coherence and effectiveness tests'** are the most relevant. These are:

CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

CE2 – are the policies and allocations realistic and appropriate having considered alternatives and founded on a robust evidence base;

CE3 – there are clear mechanisms for implementation and monitoring; and

CE4 – it is reasonably flexible to deal with changing circumstances.

2.0 PLAN OBJECTIVES

2.1 The key objectives of the Plan are set out below:



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.

2.2 Plainly, to be sound the DPS must bring forward policies and proposals which will deliver upon these objectives.

3.0 SPATIAL GROWTH STRATEGY

3.1 A fundamental element of the DPS is its spatial growth:

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.

3.2 The SGS is considered to be generally consistent with the RDS.

3.3 The two largest settlements are identified as the primary locations for future housing and economic growth.

3.4 The SGS is sound in the comment that it will '**sustain and maintain**' the diversity and quality of villages by encouraging local development which supports the population and local communities.

3.5 Paragraph 2.12 refers to '*appropriately scaled*' residential development. There is no indication of what '*appropriately scaled*' development might constitute, and indeed the SGS5 housing allocation would suggest that such development may be limited. However there is no reference towards maintaining any balance across villages, whereby development might be attributed to those which are currently deficient in terms of housing supply.

3.6 The SGS2 Settlement Hierarchy is set out below:

SGS 2: Settlement Hierarchy

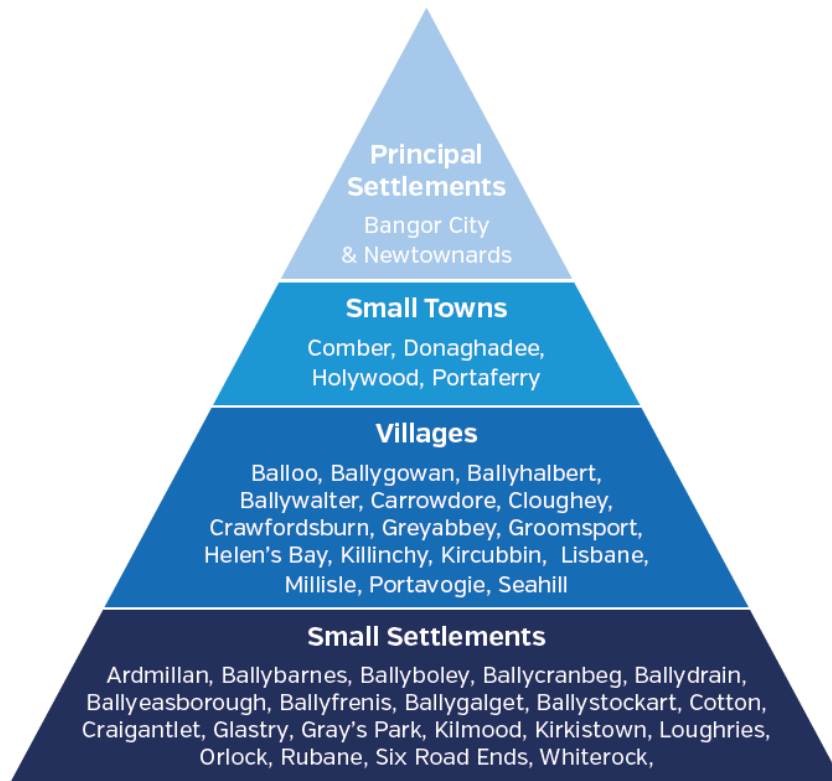


Figure 3: Settlement Hierarchy

- 3.7 The designation of Greyabbey as one of 16 'villages' is sound.
- 3.8 The SGS4 Housing Allocation is below:

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 up to 2032 is supported.

- 3.9 The PS notes that the housing allocation was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.
- 3.10 The Strategic allocation is founded upon an employment led approach. This is consistent with the Council's 'Integrated Tourism, Regeneration and Economic Development Strategy' produced in 2018. Whilst this has resulted in a figure which exceeds the HGI figures for the Borough, it must be considered soundly based, as the ambition to achieve employment growth within the Borough is an entirely legitimate objective.

Allocation to Settlement Tiers

3.11 Table 4 indicates that 61% of the housing allocation will be to Bangor and Newtownards. The four small towns will collectively receive 22% of the allocation; the villages will receive 10% and the small settlements 1%. This has resulted in the allocation figures below:

SGS 5: Strategic Housing Allocation across settlements

Table 6:
Strategic Housing Allocation across settlements⁸

	Housing Allocation 2017-2032	Potential Housing Supply (units)			Total Potential Housing Supply
		Existing Commitments	Urban Capacity Potential	Windfall Allowance	
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
Holywood	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

Villages and small settlements

- 3.12 The PS sets out an allocation of 1,265 houses for the villages. It indicates that the potential supply is 1,766. On this basis the PS would appear to be advocating that no additional land for housing will be identified within the villages at Local Policies stage.
- 3.13 Whilst the RDS Evaluation Framework is exhibited in Table 5, the 'scoring' of settlements within each tier is not evident from the PS, with paragraph 2.52 noting only that 'planning judgement' was applied to the appropriate allocation of housing among settlements.
- 3.14 **This is unsound, for the following reasons.**
- 3.15 **First**, the 'village' tier comprises 16 settlements. These range from Ballygowan with over 3000 population to Balloo with only about 200 population.
- 3.16 Plainly all of these villages will have different needs and requirements. The failure to provide individual allocations to inform the Local Policies stage of the plan process is **unsound** and inconsistent with RDS guidance.

- 3.17 **Second**, one of the main objectives of the DPS is to ***‘facilitate delivery to meet diverse housing needs.’***
- 3.18 If no land is allocated for housing then diverse housing needs (especially for social or affordable housing) will not be met, and the Plan will fail in its objectives. Any delivery of new housing will be limited to a negligible number of ‘windfall’ sites, which tend to yield small numbers and no social housing.
- 3.19 The DPS should not repeat the mistake which was identified by the PAC in its Report into the ADAP in 2008. In this respect it commented as follows:

Objections 1687 and 2516

- 5.41.1 We have previously highlighted that the draft plan fails to provide adequately for social housing and that it has no proposals for affordable housing. The HNA identifies Greyabbey as having a small specific need for social housing – six units over the period to 2013 and comments that land assembly is an issue for housing associations. While both of the objection sites would appear suitable for social housing, the matter needs to be looked at holistically and with a sense of urgency and commitment. In putting together a comprehensive package of proposals for social housing in the plan area, the Department will have an opportunity to assess what contribution these particular lands might make.
- 5.41.2 **We recommend no change to the plan as a result of these objections, pending the bringing forward for public consultation of proposals to secure adequate provision of social housing in Greyabbey.**

- 3.20 In the context of the PAC criticisms, it is useful to note that the population of the village has actually **declined** in the period from 2001 to 2021. Plainly the lack of development opportunities has contributed to this decline:

Name	Local Government District	Population	Population	Population	Population	Population
		Census 1981-04-05	Census 1991-04-05	Census 2001-04-29	Census 2011-03-27	Census 2021-03-21
Greyabbey	Ards and North Down	750	697	1,002	939	879
Greyabbey						
○ 879 Population [2021] – Census						
◦ 0.3140 km² Area						
● 2,799/km² Population Density [2021]						
📉 -0.66% Annual Population Change [2011 → 2021]						

- 3.21 **Third**, there is a substantial imbalance between those settlements which retain significant housing potential (mainly located in the outer Ards Peninsula) and those which do not. This has resulted in an imbalance across the Plan area which is inconsistent with the objective to ensure diverse housing needs are met.
- 3.22 For example, as Table 2 of the ANDBC Land Availability Report 2024 shows, Ballyhalbert Carrowdore, Cloughey, Millisle, Portaferry and Portavogie all have potential which is significantly higher than Greyabbey:

Villages					
Balloo	0	0	6	0.08%	0.37
Ballygowan	4	0.13	91	1.27%	3.06
Ballyhalbert	0	0	242	3.37%	12.02
Ballywalter	3	0.02	37	0.52%	1.05
Carrowdore	14	0.75	119	1.66%	4.88
Cloughey	1	0.13	51	0.71%	2.2
Crawfordsburn	0	0	9	0.13%	2.01
Greyabbey	1	0.09	10	0.14%	1.09
Groomspoint	0	0	9	0.13%	0.19
Helen's Bay	2	0.13	7	0.10%	0.58
Killinchy	0	0	2	0.03%	0.32
Kircubbin	0	0	24	0.33%	0.46
Millisle	4	0.08	185	2.58%	8.35
Portaferry	5	0.19	158	2.20%	7.73
Portavogie	8	0.36	169	2.35%	8.53

3.23 **Fourth**, Technical Supplement 2b Table 15 illustrates the almost total absence of urban capacity yield with Greyabbey:

Table 15: Summary of Results for Villages

Settlement	Urban Capacity Yield
Balloo	14
Ballygowan	0
Ballyhalbert	24
Ballywalter	8
Carrowdore	46
Cloughey ²	0
Crawfordsburn	0
Greyabbey	8
Groomspoint	0
Helen's Bay	0
Killinchy	0
Kircubbin	23
Lisbane	0
Millisle	30
Portavogie	44
Seahill	10
Total	207

3.24 **Finally**, on the basis of population alone Greyabbey would be expected to have an allocation of around **90 units**. The fact that it does not have **any** specific allocation is **unsound**.

3.25 It must be concluded that the DPS failure to provide a housing allocation for Greyabbey, in order to meet its local housing needs, is **unsound**. Furthermore the DPS makes no attempt to differentiate between individual settlements or to 'balance' the delivery of housing across the 'village' tier.

4.0 SUITABLE LOCATIONS FOR DEVELOPMENT

4.1 With the presence of Grey Abbey and the Estate to the south the village is curtailed in this direction. Similarly, development along the shoreline is curtailed by potential coastal flood risk.

- 4.2 Growth could be accommodated to the north and west of the village. This could avoid the higher land to the rear of Main Street, but a sustainable long term pattern of growth could readily be achieved by allocations to the north and west of Strangford View, Mid Island Park and The Chanderies, as shown below:



5.0 CONCLUSIONS AND SUMMARY

- 5.1 As drafted, the Plan Strategy will stifle growth within Greyabbey. It will fail to deliver upon the objectives of meeting housing needs and provision of community facilities. It is unsound.
- 5.2 The PS should provide separate allocations for the villages, including Greyabbey. These should be based upon factors such as population and available housing supply. It should ensure that local needs, especially for social/affordable housing, can be delivered.

DONALDSONPLANNING

February 2026