

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**

50a HIGH STREET

HOLYWOOD

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*

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 AND MRS ROBERT BOWMAN

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 REF DD20

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*

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)

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*

NO

28. Test C3 Comments (optional)

. see written submission

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*

No

32. Test CE 1 Comments (optional)

see written 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)

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)

See written submission

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

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 WRITTEN SUBMISSION

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:DD20

ARDS AND NORTH DOWN LOCAL DEVELOPMENT PLAN

RESPONSE TO DRAFT PLAN STRATEGY

SUBJECT: SPATIAL GROWTH STRATEGY AND GREEN ROAD, BANGOR

MR AND MRS BOWMAN

MARCH 2026

1.0 INTRODUCTION

1.1 This response is to the Draft Local Plan Strategy (DPS) published in October 2025. It has been submitted on behalf of Mr and Mrs Bowman and it relates primarily to the DPS approach to the City of Bangor.

Legislative Context for Representations

1.2 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'.

1.3 The soundness tests relate to procedure; consistency; and coherence and effectiveness.

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

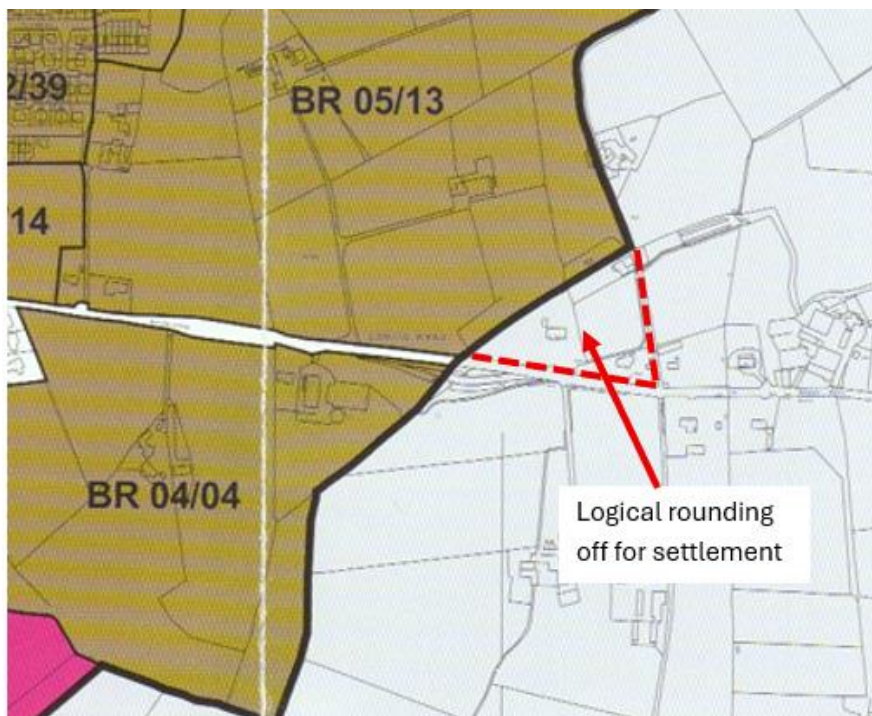
CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

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

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

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


1.5 Mr and Mrs Bowman are the owners of a parcel of land at Green Rad, Bangor. Tis land is included within the image below, which shows how the development limit can logically be consolidated:



1.6 This representation sets out the reasons why the Draft Plan Strategy should be amended to allow this land to contribute to the Plan objectives and the needs of the Borough.

2.0 PLAN OBJECTIVES

2.1 The key objectives of the PS 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.



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.



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.

2.2 These objectives are sound. In particular it should be noted that the DPS is seeking to promote sustainable growth, a mix of housing tenures, a diverse economy, and sustainable movement patterns.

2.3 The Plan Strategy policies and allocations must align with and deliver upon these objectives.

3.0 SGS1 SPATIAL GROWTH STRATEGY

3.1 The SGS is a core element of the PS. This is replicated below:

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, economic growth and investment. **That is sound.**

SGS2 Settlement Hierarchy

3.4 The settlement hierarchy reflects the SGS, with Bangor and Newtownards again being at the top of the hierarchy. Whilst Bangor's city status and its population could be argued to place it above Newtownards in the hierarchy the key objective must be to ensure that Bangor is able to **strengthen its role** as a primary location for housing and economic growth.

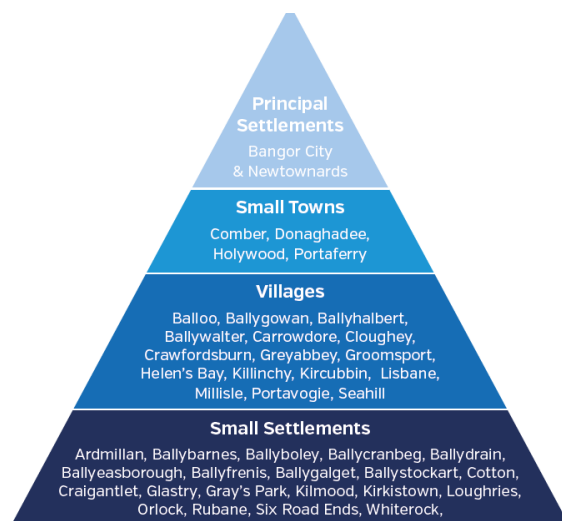


Figure 3: Settlement Hierarchy

4.0 STRATEGIC HOUSING ALLOCATION

4.1 SGS4 is critical to the Plan Strategy.

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].

4.2 **The allocation of 15,608 homes up to 2032 is supported.** The DPS notes that this was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.

4.3 The Strategic allocation is soundly based 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, the ambition to achieve employment growth within the Borough is an entirely legitimate objective.

Allocation to Settlement Tiers

4.4 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%.

4.5 Table 6 provides the allocation across settlements:

SGS 5: Strategic Housing Allocation across settlements

Table 6:
Strategic Housing Allocation across settlements^a

	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

Principal Settlements

- 4.6 it is evident that Bangor and Newtownards have the largest allocations, with 4,508 and 3,381 houses respectively.
- 4.7 As the City of Bangor has approximately **39%** of the Borough population it would have been expected to be allocated a similar proportion of the housing allocation, so the figure provided of 4,508 is lower than would be expected if based upon population equivalent, which would equate to around **4,950**. The Evaluation Framework in Technical Supplement 1 does not explain why it has only been allocated a lower quantum than might otherwise be expected.

Housing Supply

- 4.8 It is also important to note that the NPPF in England has reinforced the need to ensure that housing is likely to be delivered. The 2019 NPPF definition of 'deliverable' is below:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 4.9 Table 6 above shows that Bangor has a potential housing supply of 2,004 houses, which is **some 2,500 short of its allocation**. Additional housing land will need to be allocated to meet this requirement. Furthermore, this will need to be in locations where this is deliverable. **The BR05 lands have already been deemed suitable for development, are well located, and accessible. Development at this location will be deliverable.**
- 4.10 Table 7 indicates that the potential supply in the Borough is 14,319 dwellings. However this figure is a Borough-wide figure, so it is inflated by oversupply in other towns and villages. The PS must make clear that oversupply in other settlements will not prejudice the allocation of sufficient land in Bangor to meet the Plan objectives of housing and economic growth.

Table 7:
Potential housing supply [Source: ANDBC]

Source	Potential housing units over plan period 2017-2032
Existing commitments	7,855
Constructed since start of plan period (Apr 2017-Mar 2022)	2,959
Urban Capacity Study	1,115
Windfall	2,390
Overall Total	14,319

- 4.11 Table 6 of Technical Supplement 2 shows that Bangor has been a popular location for development, with less than 14% of its potential housing land remaining available in 2024. Recent developments have further reduced this figure:

Table 6: Housing Land Availability Study 2023-2024 results (ANDBC)

Housing Land Availability Study 2023-2024	Built		Remaining Potential		
	No.	Area (ha)	No.	Overall %	Area (ha)
Principal Settlements					
Bangor	97	3.55	992	13.82%	36.7
Newtownards	87	3.62	3138	43.70%	150.56
Principal Settlements Total	184	7.17	4130	57.52%	187.26

- 4.12 The critical shortage of housing land in Bangor is further illustrated by it having the **highest need** for social housing, as indicated in Table 4 of Technical Supplement 2:

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

- 4.13 With all of the major housing zonings in Bangor now either built or committed it is impossible to see how the requirement for 600 social units can be met, especially as any 'windfall' sites are likely to be small in scale. However by zoning additional housing land there is the potential to include the requirement for a percentage of social/affordable housing, or indeed to allocate land specifically for this purpose.
- 4.14 It must be concluded that the Plan Strategy should ensure that land is allocated to facilitate additional housing in Bangor. The additional lands should also include a social housing requirement to ensure that the full range of housing needs is met.

5.0 MANAGEMENT OF HOUSING LAND RELEASE

- 5.1 The PS proposes to introduce a phased release of land in the main settlements and the small towns:

SGS 6: Management of Housing Land Release

To provide a managed release of housing land across the Borough, the Council will zone housing land at Local Policies Plan stage within the Principal Settlements and Small Towns in two phases.

Phase 1

Phase 1 housing land will be developed first and will comprise:

- existing commitments¹²; and
- housing zonings¹³ within the urban footprint¹⁴

Phase 2

Phase 2 housing land will be identified and zoned, at Local Policies Plan stage, to be held in reserve and will comprise:

- retained legacy housing zonings outside the urban footprint without extant residential planning permission; and
- any new housing zonings outside the urban footprint where required¹⁵.

These Phase 2 lands may be released during the Plan period, if:

- (a) monitoring indicates that there is a need to release Phase 2 sites in order to maintain a 5-year supply of available housing land; or
- (b) the release of a particular site is required to meet an extreme and localised particular housing need.

Where neither of these two conditions are met, planning permission for the development of Phase 2 lands will be refused.

In smaller settlements the LPP may indicate where it is anticipated that most new housing will be located through the designation of Housing Policy Areas (HPAs).

- 5.2 There is no issue with the principle of a managed release of housing land. However the soundness of this approach must be questioned in the context of Ards and North Down, for the following reasons.
- 5.3 **First**, Development Plan Practice Note 01 advises that development plans should provide a 15 year framework for development (extract below):

2.6 The LDP should fulfil the following functions:

- **provide a 15-year plan framework** to support the economic and social needs of a council's district in line with regional strategies and policies, while providing for the delivery of sustainable development;

- 5.4 It is also worth noting that the NPPF in England states that strategic policies should be for a 15 year period following adoption:

22. Strategic policies should look ahead over a minimum 15 year period from adoption¹⁴, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

23. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)¹⁵.

5.5 The ANDBC LDP is now already 8 years into its plan period, and even on the Council's best estimate it will not be adopted until at least 2030. It is simply impossible for it to provide the **15 year framework for growth** which is required from a LDP. This is unsatisfactory and, unless remedied, is likely to render the Plan **unsound**.

5.6 **Second**, the vast majority of the land supply likely to be developed within the plan period is already committed, with planning permissions in place and development already under way. This is evidenced by the figures in Table 7 which show commitments and urban capacity is already close to the overall allocation figure.

5.7 **Third**, experience has shown that it can take several years to bring even zoned land forward to development stage. Examples include:

Bell's Farm - zoned land in Bangor. This was subject to pre-application community consultation in 2018, and application LA06/2021/1012/F for 157 dwellings was submitted in 2021. Despite being on zoned land the application has attracted in excess of 100 objections and remains undetermined after over 4 years in the Planning process.

Tullynagardy –zoned land in Newtownards. Application LA06/2019/0888/F – submitted in 2019 and approved late 2025.

Ballyhalbert – housing policy area within existing development - LA06/2021/0118/F for 98 dwellings, 3 years from submission to approval.

5.8 With land costs, infrastructure costs (access, services etc) developers need a degree of certainty over their future build program.

5.9 **Finally**, it is worth noting the comments of the PAC in the 2008 Report on the Ards and Down Area Plan:

2.13.8 It seems to us that even if the scope of the mid-term review were confined to deciding which Phase 2 lands are to be released for development, it would still take two to three years to complete. A significant amount of technical work would be involved, probably including equality impact assessment and strategic environmental assessment. In our opinion, the general public, including landowners and house builders, would be entitled to expect opportunities for consultation and participation. It is likely there would be objections and a fresh public inquiry. In any case, we consider the idea of following plan adoption immediately by a phasing review to be fundamentally flawed, because little or no new monitoring data would be available to support the review. In these circumstances, the decisions that would be taken in 2011/12 or 2012/13 are unlikely to be significantly different to those that could have been taken at the time of adoption.

- 5.10 **In a situation whereby the 2032 end date of the ANDBC Local Plan is so close to Adoption, the PAC's words of advice appear to be just as applicable to this Plan process.**
- 5.11 The proposal for phased release of land is not founded upon a strong evidence base. On the contrary, the evidence shows that there is no requirement for such a policy, and that its inclusion in a plan with such a short time period can be regarded as unsound.

6.0 CONCLUSIONS

- 6.1 The DPS has taken an appropriate approach to its overall housing allocation for Bangor. However additional allocations are warranted to reflect its 'city' status and to ensure that affordable housing requirements can be met.

DONALDSONPLANNING

March 2026