

## 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*

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)**

BOWMAN AND MCGIMPSEY FAMILIES

---

---

---

**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 DD01**

**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)

Lack of evidence that SPPS direction to identify mixed use sites was considered.

---

---

---

**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:DD01**

**ARDS AND NORTH DOWN LOCAL DEVELOPMENT PLAN**

**RESPONSE TO DRAFT PLAN STRATEGY**

**SUBJECT: SPATIAL GROWTH STRATEGY AND STRATEGY FOR BANGOR**

**On behalf of BOWMAN AND MCGIMPSEY FAMILIES**

**MARCH 2026**

## CONTENTS

- 1.0 Introduction
- 2.0 Plan Objectives
- 3.0 Employment Strategy
- 4.0 Strategic Housing Allocation
- 5.0 Management of Housing Land Release
- 6.0 Affordable Housing
- 7.0 Greenways and active travel.
- 8.0 Conclusions and Recommendations

## SUMMARY:

KEY ASPECT OF DPS	PLAN PROPOSAL	AMENDMENT REQUIRED FOR SOUNDNESS
Plan Objectives	Promote sustainable growth etc	Support
SGS 1 Spatial Growth Strategy	Focus growth on Bangor and Newtownards	Support
SGS2 Settlement Hierarchy	Bangor and Newtownards as 'Principal Settlements'	Support
SGS3 Strategic Employment Land Allocation	Allocate minimum of 25ha.	Support
	Promote SELs	Support
	Retain existing zonings.	<p>DPS is <b>unsound</b> under <b>CE2</b> as it fails to consider <b>why</b> some allocations have not been able to deliver.</p> <p>It also fails to consider the potential for <u>mixed use designations</u>, as required by the SPPS and as utilised in Lisburn and elsewhere.</p> <p>BMAP Zoning BR05 (and adjacent lands to the east) should be taken forward in the ANDBC Plan Strategy as a '<b>Strategic Mixed Use</b>' (<b>SMU</b>) designation.</p> <p>An SMU allocation could help to 'unlock' this important site and deliver in excess of 700 jobs as well as a range and choice of housing and community facilities.</p>

<b>SGS4 Strategic Housing Allocation</b>	Allocation of 15,608 homes for Plan Area on basis of employment needs.	Support
<b>SGS5 Allocation to Settlements</b>	Table 6 Allocations of 4,508 to Bangor and 3,381 to Newtownards.	Support – although allocation to Bangor could be increased to reflect its 'City' status, population, and connectivity.
	Table 6 'Potential Supply' of 2,004 dwellings in Bangor.	The potential supply calculation is <b>unsound</b> – our analysis shows that the potential supply evidence for Bangor is not soundly based and cannot be relied upon as zoned BMAP sites remaining have capacity for less than 400 houses.
<b>SGS6 Management of Housing Land Release.</b>	Potential allocation of phase 2' sites.	<b>Unsound under CE2 and CE4.</b> The effective Plan period is too short to merit any need for phasing.
<b>HOU3 Affordable Housing</b>	Thresholds for Affordable Housing	Support in principle but Plan Strategy is <b>unsound</b> as it fails to recognise that delivery of housing to meet social need in Bangor (c.600 houses) will only be achieved through significant new allocations.
<b>OS4 Greenways etc</b>	Protection of greenways	Support - The proposed 'SMU' lands are bisected by the greenway.
<b>AT1 Active Travel</b>	Maximise opportunities for active travel and sustainable transport.	Support – The proposed SMU lands are adjacent to transport routes and the greenway.
<p><b>Conclusions:</b> The overall Plan Strategy is supported.</p> <p>However it is <b>unsound</b> in its approach to the <u>delivery</u> of employment land and its failure to provide a '<b>Strategic Mixed Use</b>' designation at Newtownards Road, Bangor which has potential to deliver over 700 jobs, over 300 dwellings to meet a range of local needs, and associated local facilities in a highly sustainable location.</p>		

## 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 the Bowman and McGimpsey families, 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:

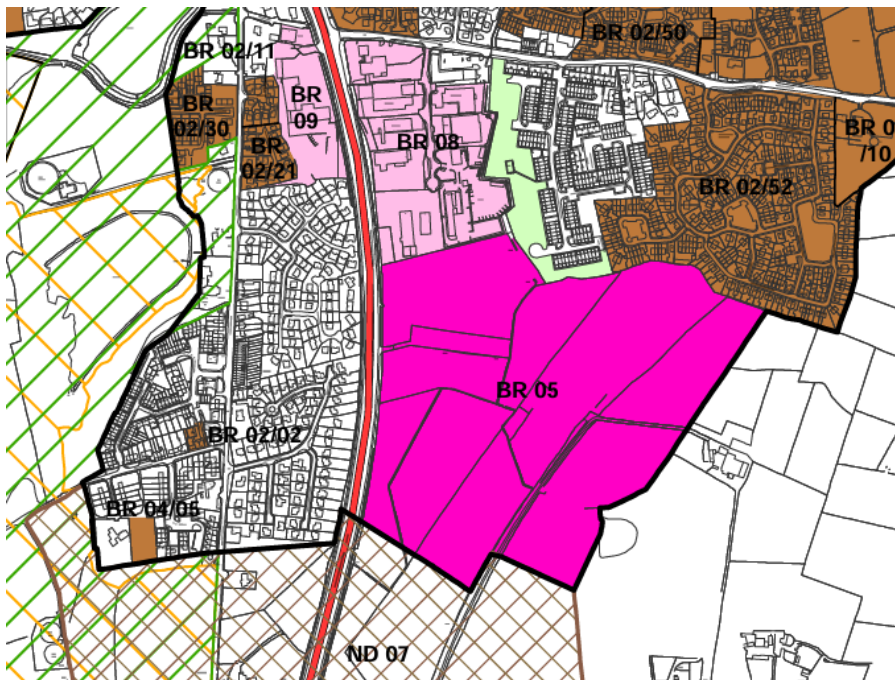
CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

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 The Bowman and McGimpsey families are the owners of the large BMAP employment designation BR05 at Newtownards Road, Bangor, and of further lands to the east:



1.6 It should be noted that the Adopted version of BMAP (although quashed for reasons unrelated to this development) extended the designated area from that which was originally shown as BR06 in the draft version of the Plan.

1.7 The extent of permissible uses in BMAP was restricted to the following:

## Employment Zoning


<b>Zoning BR 05</b>
Employment Land at Newtownards Road
23.1 hectares of land are zoned for Employment at Newtownards Road as identified on Map No. 3/001 – Bangor.
Key Site Requirements:
<ul style="list-style-type: none"> <li>The following uses will be acceptable on the site: Industrial and Business, Use Classes B1 (b) and B1 (c), B2, B3 and B4 as currently specified in the Planning (Use Classes) Order (Northern Ireland) 2004.</li> </ul>

1.8 The BR05 lands represent the largest undeveloped zoning in the Borough. How this site is treated in Adopted Plan Strategy will be critical to the achievement of the Council's objectives for delivery of housing and employment growth over the Plan Period and beyond.

1.9 This representation sets out the reasons why the Draft Plan Strategy is unsound in some respects, and how it should be amended to create the conditions which will 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 Hollywood 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.

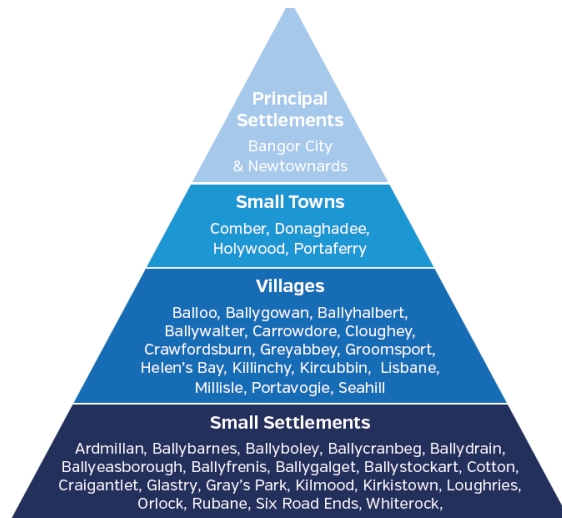


Figure 3: Settlement Hierarchy

### Strategic Allocation of Economic and Industrial Development Land

- 3.5 Significantly, the RDS directions afford substantial weight to the allocation of employment land within Local Development Plans. The DPS has adopted this approach, recognising the need for an ample supply of suitable and available land to meet economic development needs:

#### Strategic Allocation of Economic Development/Industrial Land

#### An Appraisal of Future Industrial Land Requirements and Strategic Designations

**2.25** A fundamental role for LDPs is to ensure there is an ample supply of suitable and available land to meet economic development needs within the plan area. This requirement is set out by Regional Guidance RG1 of the Regional Development Strategy (RDS) which states that the supply of economic development land should be accessible and located to make best use of available services. The focus will be upon larger urban centres and regional gateways, taking advantage of their locations on regional transport networks.

- 3.6 The BR05 lands 'tick every box' in the above strategy. They are large, they are available, they are accessible, and they are in the largest urban centre within the Borough. They are also adjacent to the main transport network. They are plainly ideal to contribute to the economic growth of the Borough. **This is a location which must be identified for its strategic importance for delivery of growth.**

- 3.7 The DPS objective to deliver economic growth has stemmed largely from the Council's 'Integrated Strategy for Tourism, Regeneration and Economic Development' in the Borough.



- 3.8 This has an aspiration for an additional 7,500 jobs by 2030. Medium and high growth sectors are targeted.

- 3.9 An extract from the Strategy is below:

#### Job Targets

**Target :** Increase job growth by an ambitious 22% resulting in an additional 7,500 jobs by 2030.

#### Context/ Rationale:

The job creation target proposed by this strategy is highly ambitious and it is acknowledged that it involves a high risk of non-achievement. However, the identified target reflects the high level of ambition held by key stakeholders and their focus on delivering prosperity and economic vibrancy within Ards and North Down.

Delivery against the stated target is reliant on the achievement of the 'high growth' scenario identified by the NI Skills Barometer forecast, which identifies job growth averaging 1.1% per annum at a regional level. Application of this high growth scenario to Ards and North Down's current sectoral profile suggests the creation of circa 4,000 jobs over the strategy period. This is the encompassing figure which includes the detailed figures and sectors outlined below. Achievement of this level of growth carries a high level of risk as it is exposed to a range of political and economic uncertainties.

Achievement of the strategy's job creation target will require a reorientation of the local business base to increase the number of businesses that are active within medium and high growth sectors. This reorientation will need to be supported by targeted interventions to achieve significant increases in business starts and survival, enhanced levels of business growth and the attraction of inward investment within these sectors.

By way of illustration, 2015 data highlights that Ards and North Down had 1,025 registered businesses within sectors that are expected to experience high growth over the next decade i.e. ICT: Professional, Scientific and Technical; and Arts, Entertainment and Recreation. These businesses generated c3,500 employee jobs in 2015. Increasing the baseline number of local businesses/ jobs within these sectors by 25% could result in the creation of 875 additional jobs (assuming that the baseline metrics remain constant).

- 3.10 One of the main aspects of the Integrated Strategy is to ensure that space is available to ensure effective delivery of services. In addition, it notes the importance of investment sites at key strategic locations. The objectives below are particularly relevant:

Access to investment sites will be key and specific investment areas or zones may be established at strategic locations within the Borough. Consideration may be given to a range of potential models, including fully recognised Enterprise Zones to more streamlined alternatives. The establishment of public private partnerships will also be explored in developing key sites. These purpose-built locations may offer incentives to potential investors. The locations would be equipped with necessary infrastructure, including high speed broadband, landscaping and car parking. Appropriate locations for such a development will require good transport connectivity and close proximity to existing urban centres.

- 3.11 Flexible spaces within town hubs, linked to larger business and innovation centres within the Borough are also envisaged:

#### D. TOWN AND VILLAGE FLEXIBLE SPACES

Many businesses and organisations are now able to operate more flexible working practices thanks to advances in technology and communications. In the context of Ards and North Down, where a large percentage of resident's commute beyond the Borough to work, it is proposed to establish a network of flexible town and village centre work hubs. These would provide a range of small to medium sized, well-equipped flexible work spaces for affordable short term rent, so allow working closer to home.

The hubs will also be used to encourage new business start-ups to establish locally, providing entrepreneurs the flexible space and support they need in the most convenient locations. The hub network will link to larger business and innovation centres with the Borough, so that business growth can be supported locally wherever possible. While such spaces would be delivered by a range of parties, they may also provide a centralised point of contact with Ards and North Down Borough Council, at which to access information and services.

- 3.12 This recognition of the need to provide flexible spaces, and to reduce the incidence of commuting outside the Borough is critically important. **The provision of employment facilities, integrated with areas where people live, is a fundamental principle of sustainable development.**
- 3.13 SGS3 of the DPS has clearly been derived from the above. It relates to the allocation of economic development land. In particular it should be noted that it refers to a minimum of 25ha; focuses upon the most accessible locations; promotes Strategic Employment Locations; and provides for a range of business needs:

## 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.

- 3.14 It is noted from para 2.34 that the employment land allocation has considered a 'baseline' scenario of 4,500 jobs, and the 'success scenario' of 7,500 jobs. In this context the allocation of a **minimum of 25 ha** for economic and industrial development, focused upon the principal settlements, can be regarded as **sound**.
- 3.15 The proposal to introduce **Strategic Employment Locations** is also sound. The DPS has identified Balloo Industrial Estate in Bangor and Jubilee Road, Newtownards. However it is noted from Table 3 that Jubilee Road has **only 3.61 ha** remaining undeveloped. Whilst Jubilee Road has successfully attracted and maintained a range of employment types, the availability of only 3.6ha can hardly be regarded as '**strategic**' in the context of the Borough.
- 3.16 Paragraph 2.37 sets out the justification for the identified **37.28 ha oversupply**. It includes an allowance for unexpected growth; flexibility of choice; and allowance for non-delivery of sites.
- 3.17 It is significant to note that much of this oversupply is concentrated upon the BMAP BR05 site (draft BMAP zoning BR06 of 17 ha). Whilst over provision may be consistent with the RDS, it is important for the Plan to be **realistic**, and to have regard to the reasons **why** existing zoned sites may not have been able to deliver upon their employment potential. In this respect **Soundness test CE2** requires policies and allocations to be **realistic, appropriate and evidence based**.

- 3.18 The BR05 lands are extremely well located in relation to Bangor. They are not prominent, they are relatively level and they are directly adjacent to the dual carriageway which links the two principal settlements. Indeed following the BMAP Examination the PAC Report recommended the extension of this designation:

**Land at Newtownards Road - seeking an extension to Employment Zoning BR 06**  
(Objection 1920/14)

This objection from NDBC sought the inclusion of additional land within zoning BR 06. It was argued that the existing zoning is too restricted and should be enlarged to accommodate expected economic growth.

The Council argued that as BR 06 is the only proposal for additional employment/industrial zoning in Bangor, the overall size of the proposed zoning (i.e. 17 ha of land) is too restricted. The Council argued that, due to the physical attributes of the BR 06 zoning, the overall effectiveness of the site will be hampered by the need to provide adequate infrastructure and an 8-10 metre landscape buffer where the zoning abuts the countryside. By enlarging the site its overall effectiveness would be greatly enhanced. The Department considered that there could be merit in including the objection site within the SDL as an extended part of BR 06, as it is clearly related to this zoning.

The site includes agricultural land and land in poor condition that appears to have been part of a landfill operation. The site extends along the eastern side of Drumhirk Way, a concreted lane running off the Newtownards Road. We do not consider that development of the site for employment uses would have an unacceptable visual impact or would lead to an illogical extension of the urban area. It would not extend further east than the adjacent housing zoning BR 04/04 or further south than the existing BR 06 employment zoning. It would not have a major impact on the setting of Bangor.

**PAC Report**

- 3.19 BR05 is clearly a strategic location. Whilst the proximity to the road network is a key locational advantage, it is also a constraint upon delivery. The key issue is that the provision of a new controlled access to the dual carriageway (as required by the Key Site Requirements) is an expensive requirement. When coupled with increasing build costs for employment facilities, along with modest rental returns, development here is less attractive to private investors and beyond the reach of smaller commercial operators. It is for this reason that **the DPS must consider how best to stimulate the opening up of this zoning and thereby facilitate economic development.**
- 3.20 In this respect it is relevant that the DPS has failed to give proper regard to two key elements of Regional guidance.
- 3.21 **First**, whilst the RDS Employment Land Evaluation Framework is referred to, there appears to have been relatively scant regard to the **'fitness for purpose'** of the existing employment portfolio as required under Stage 1. In addition, a robust appraisal of sites against **'occupier or developer needs'** is not readily apparent, as required under Stage 3:

TABLE 3.1: The Employment Land Evaluation Framework	
<b>Stage 1</b> Taking Stock of the Existing Situation	An initial assessment of the <u>'fitness for purpose'</u> including the environmental implications of the existing employment land portfolio. This is principally in order to identify the 'best' employment sites to be retained and protected and identifying sites that should clearly be released for other uses.
<b>Stage 2</b> Understanding Future Requirements	Quantify the amount of employment land required across the main business sectors during the development plan period. This is achieved by assessing both demand and supply elements and assessing how they can be met in aggregate by the existing stock of business premises and by allocated sites. Account should also be taken of turnover of existing sites due to relocation or closures. Both short/medium term and strategic provision need to be considered in this process.
<b>Stage 3</b> Identifying a 'New' portfolio of sites	Devise qualitative site appraisal criteria to determine which sites meet the <u>occupier or developer needs</u> . Confirm the existing sites to be retained, replaced or released, and any gaps in the portfolio. In this allocation, consideration should be given to previously used sites, and in the reallocation, the environmental impact of one site relative to others should be included. The results of Stage 2, together with this site-appraisal should provide a robust justification for altering allocations for employment land.

3.22 **Second**, the DPS has not incorporated the clear SPPS direction to identify opportunities for mixed use development in 6.94, below:

**6.94** LDPs should also identify opportunities for mixed use development, including economic development uses, where this would create synergy and underpin the economic viability of the development as a whole. Plans should indicate, through key site requirements, the types of economic development that will be acceptable and seek to avoid uses that would have a detrimental impact on the environment and / or residential amenity. It is important that such development is sustainable, and major mixed use sites should therefore be identified in locations that are well served by public transport, accessible by walking and cycling, have adequate infrastructure and where development can be properly integrated, in terms of land use and design, with surrounding areas.

3.23 There is no evidence that, despite comprehensive POP representations in respect of the BR05 lands, the DPS considered any opportunities for mixed use development within the Plan area.

3.24 This is even more surprising when the 'Gravis Report' which was commissioned by the Council on employment lands (March 2019) concludes as follows:

## Bangor

Given that a large portion of the remaining available zoned lands fall within the Balloo Industrial Estate, those retained zonings in Bangor could focus on accommodating small business workshops and light industrial uses. The Council may wish to consider Key Site Requirements for retained zonings that encourage such uses. General offices uses, leisure and hotels may be better located in the town centre or as part of a 'mixed-use' zoning.

- BR06 – retain and re-zone as 'mixed-use' zoning to reflect landowners plans. In this way, some form of economic development will be delivered. A Key Site Requirement could be added to such a zoning to ensure delivery of economic development on site (i.e. between 40-50% of the site);
- BR07 – retain as economic development zoning or designate as a SEL;
- BR08 – retain as economic development zoning or designate as a SEL; and
- BR12 – de-zone, as lands cannot be relied upon to deliver economic development. It is noted that there is existing economic uses on the rest of this zoning but appropriate policy can allow expansion, if required.

Based on the above recommendations, Bangor would have a total of **25.4ha.** zoned economic development lands (including the Invest NI lands), made up of zonings BR07, BR08 and c.50% of a re-zoned BR06.

- 3.25 The concept of mixed-use development has rapidly gained popularity in the UK over the past decade, with major schemes such as Kings Cross, Battersea Power Station and Paradise Birmingham having been brought forward. Regional cities have also experienced a boom in mixed use projects, driven to meet growing housing, employment and social demands. Such projects can deliver upon convenience and connectivity; community and lifestyle; work/life balance; resilience to economic downturns; technological innovation; and long-term sustainability. More local examples include the Weaver's Cross development in Belfast, and the Belfast Local Plan Strategy has included a series of Development Opportunity Areas (DOAs) under Policy CC1 whereby underutilised land is highlighted for mixed use development. Such areas include Sailortown; East Bank; Ormeau Avenue; Cathedral Quarter etc.
- 3.26 But mixed-use schemes are not just applicable within large city centres or major regeneration projects. They are now also being rolled out on 'greenfield' sites in Northern Ireland. A prime example of sustainable mixed-use development, introduced to provide a stimulus for development, is the now adopted Lisburn Plan Strategy, extracts below:

## B: A Thriving Place

### Driving Sustainable Economic Growth

Plan Objective B outlines those actions the Council will adopt to drive sustainable economic growth to appropriate locations within the Council area:

- 3) Promote Mixed Use development at strategic locations at West Lisburn and Purdysburn with appropriate employment uses to facilitate opportunities for economic growth and inward investment

Strategic Mixed Use Sites will serve to attract inward investment whilst Local Employment sites will help support local employment needs through providing a range of sites suitable for all economic sectors. All sites will be subject to review at the Local Policies Plan stage.

## Lisburn DPS Extracts

- 3.27 Designation SMU01 for West Lisburn was brought forward as the Council recognised that a draft BMAP employment zoning was unlikely to be delivered due to high infrastructure costs. Accordingly the lands were designated for a mixture of the following uses:

j) The following uses, as defined in the Planning (Use Classes) Order (Northern Ireland) 2015 (or as amended) will only be acceptable:

- employment (Use Classes B1, B2, B3 and B4)
- dwellings (Use Class C1)
- small scale local needs convenience retailing (Use Class A1)
- healthcare facilities (Use Class D1(a))

## Lisburn SMU01

### **Strategic Mixed Use Designation for BR05 and adjacent lands.**

- 3.28 Soundness test CE2 requires policies and allocations to be realistic and appropriate, having regard to delivery constraints and a robust and credible evidence base. There is compelling evidence that the designation of BR05 solely for employment purposes has not been able to deliver economic development to date. Accordingly, this strategically important site may remain undeveloped and unable to contribute to the Council's objectives for economic growth.
- 3.29 To conform with Test CE2 there is an overwhelming case for BMAP zoning BR05 and adjacent lands to the east to be identified in the DPS as a location for '**Strategic Mixed Use (SMU) employment, housing and community facilities**'.
- 3.30 **An SMU designation will contribute to the plan objectives as follows:**
- It will deliver sustainable growth in an accessible location on the main transport route between the two principal settlements;
  - This is a location where infrastructure, services and employment opportunities are already in close proximity;
  - The site location benefits from direct proximity to the Council's new greenway, with pedestrian and cycle linkages between the two main settlements. This will reduce reliance upon the private car, consistent with regional objectives and the climate change agenda;

- The benefits of mixed use development as a stimulus for both housing and employment growth is now well established throughout the UK, and with specific examples now embedded within both the Belfast Plan Strategy and Lisburn and Castlereagh Plan Strategy;
  - The employment consultant's appointed by the Council (Gravis) endorse the rezoning of this area for mixed use as a stimulus for economic activity;
  - It will stimulate and deliver development on land which has long been identified as physically and environmentally suitable for development;
  - It will contribute to a thriving, well connected and diverse economy;
  - It will provide a suitable location for a range and choice of employment types, from small startup and hi-tech businesses, to plots suitable for larger B2 and B4 developments;
  - The site is sufficiently large to facilitate a 'masterplanning' approach, to ensure successful integration between land uses and infrastructure. Initial masterplanning work (previously set out in the response to the Preferred Options Paper and at Appendix 1) demonstrates how delivery of at least 700 jobs is realistic by utilising only part of this extensive zoning;
  - There is potential for a range and choice of housing, including much needed social and affordable housing, with potential for at least 300 new homes to be delivered to meet local needs; and
  - It will integrate employment and housing, minimising the need for commuting or travel outside the Borough and thus reducing pressure upon the transport networks.
- 3.31 **Appendix 1** summarises how it is envisaged SMU designation could deliver significant employment, as well as a range of other uses. It is also worth noting that whilst this representation is focused upon the area already designated under BR05, a further easterly extension to this area could readily be facilitated should additional flexibility to accommodate economic or residential development be considered desirable.
- 3.32 **Plainly, the identification of this land for Strategic Mixed Use will ensure that the Plan Strategy will be realistic and appropriate in its aspirations to secure economic growth.**

## 4.0 STRATEGIC HOUSING ALLOCATION

4.1 SGS4 and SGS5 are critical elements of 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. This makes delivery of employment (as discussed in Section 3.0) even more critical to the Growth Strategy.

#### **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 does not make clear why there is an apparent shortfall between the housing allocation total of **15,608 overall** and the **12,649** allocation which is set out. However on further examination it is evident that the allocation excludes the number of units already built between 2017 and 2022 (ie 2,959 units).

## SGS 5: Strategic Housing Allocation across settlements

Table 6:  
Strategic Housing Allocation across settlements<sup>8</sup>

	Housing Allocation 2017-2032	Potential Housing Supply (units)			
		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
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
<b>Total</b>	<b>12,649</b>	<b>7,855</b>	<b>1,115</b>	<b>2,390</b>	<b>11,360</b>

### 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
<b>Overall Total</b>	<b>14,319</b>

- 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)
<b>Principal Settlements</b>					
Bangor	97	3.55	992	13.82%	36.7
Newtownards	87	3.62	3138	43.70%	150.56
<b>Principal Settlements Total</b>	<b>184</b>	<b>7.17</b>	<b>4130</b>	<b>57.52%</b>	<b>187.26</b>

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
<b>Bangor Urban</b>	<b>Bangor Urban</b>	<b>600</b>
Holywood	Holywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomsport	Groomsport	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) <sup>13</sup>		40
<b>Total</b>	<b>Ards and North Down</b>	<b>1,390</b>

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.

4.15 In this respect it must be pointed out that a 'Strategic Mixed Use' designation for the BR05 lands will facilitate not only employment uses, but can incorporate the provision of a range and choice of housing, including social housing, retirement housing etc., all on land which has already been confirmed as being satisfactorily integrated with the settlement. The proximity to major transport routes and the greenway is a further advantage of this location. **Appendix 1** provides further details.

## 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 commitments<sup>12</sup>; and
- housing zonings<sup>13</sup> within the urban footprint<sup>14</sup>

#### 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 required<sup>15</sup>.

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 adoption<sup>14</sup>, 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)<sup>15</sup>.

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 AFFORDABLE HOUSING

6.1 The DPS seeks to introduce an affordable housing policy, below:

 **Policy HOU 3**  
**Affordable Housing**

Planning permission will be granted for residential development of 5 housing units or more, or on a site of 0.1 hectares or more, where at least 20% of the units are affordable housing<sup>4</sup>.

Where there is an acute localised need as demonstrated by the Northern Ireland Housing Executive (NIHE), the proportion required may be uplifted on an individual site.

Provision for affordable housing will also be made on sites zoned for housing in the Local Policies Plan, and key site requirements (KSRs) may be applied to supplement the delivery of affordable housing where necessary to meet local need.

Affordable housing shall consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, a statement of housing need provided by NIHE will be taken into account. If need in the local area has been met or has decreased, the requirement for affordable housing may be adjusted accordingly.

6.2 The introduction of an affordable housing policy is in accordance with the RDS and the SPPS.

6.3 The DPS proposal to require affordable housing at a threshold of 20% of units within new developments is not unreasonable.

6.4 However It will also require affordable housing for **'residential development of 5 units or more, or on a site of 0.1 hectares or more.'**

6.5 There are two key concerns with this. First, the threshold of 5 units is very low. This would require one affordable unit within a small development of 5 houses. Not only will this result in additional administration to implement (via S76 agreements etc) but multiple small schemes are unlikely to make any meaningful contribution to the overall social or affordable need within the Borough (Table 4 of TS2 shows a need for **600 social units** in Bangor).

6.6 More fundamentally, the threshold of an affordable housing requirement on sites of 0.1 ha or more is unworkable. Small sites of 0.1 hectare are only likely to yield about 2 dwellings (at a density of 20dph) unless they are in inner urban locations and are suitable for higher density apartment type development.

6.7 The only way in which **delivery of affordable or social housing** is likely to occur in any meaningful numbers is if the PS directs the LPP to identify specific and uncommitted sites. This will especially be the case in Bangor, where so much of the housing land is already built upon or committed.

6.8 **As proposed, this policy is unsound**, unworkable and unlikely to deliver the objectives. The thresholds for affordable housing must be increased to proposals of at least 10 units, or on sites of 1ha or more.

6.9 The landowners on BR05 have already indicated that a significant percentage of the site can be allocated for affordable housing. In addition, it is proposed to include a number of retirement homes, so that a wide spectrum of community needs can be accommodated. In the context of a clear shortage of available development land in Bangor, this is precisely the type of development which the Plan should be seeking to facilitate in order to meet housing needs across the community.

## 7.0 GREENWAYS AND ACTIVE TRAVEL

7.1 The provision and protection of pedestrian and cycle connectivity within and between settlements is an important element in the DPS.

7.2 Policy OS4 seeks to ensure that greenways will not be prejudiced by development.



### Policy OS 4 Greenways, Blueways<sup>28</sup> and Community Greenways

Planning permission will only be granted for new development within or adjacent to an existing or planned greenway, blueway or community greenway where it will not prejudice its retention, enhancement, or further development as a green corridor and active travel route.

Where appropriate, development proposals must include access and open space linkages to designated greenways, blueways and community greenways.

7.3 Policy OS4 is supported. The BR05 lands are bisected by the greenway proposal. This is regarded as an asset to the site as it will facilitate safe and convenient linkages between those living and working on the site and other community facilities.

7.4 The Policy for 'active travel' is also sustainable:



### Policy AT 1 Supporting Active Travel and Sustainable Transport

Planning permission will only be granted for development proposals where applicants demonstrate how the promotion of active travel and sustainable transport has been maximised in all new development proposals.

Measures will be proportionate to the nature and scale of the proposed development but may include:

- Layout design giving priority to pedestrians, cyclists, and other wheeled users;
- Increased permeability and connections to existing cycling and walking links;
- Providing facilities for pedestrians, cyclists and other wheeled users;
- Connectivity with public transport; and
- Other complementary measures that support reduction in private car usage.

Where appropriate, specific measures will be detailed for zoned sites in the key site requirements.

7.5 Once again, the BR05 land has excellent connectivity, both for road users and pedestrians. This policy is supported. The integration of the greenway into this development will promote active travel.

## 8.0 CONCLUSIONS

8.1 The DPS has placed economic growth and employment at the heart of its growth strategy. This in turn has informed the proposed housing allocations.

8.2 Whilst the DPS has continued to recognise the suitability of the BR05 lands for employment purposes, economic considerations have already demonstrated that a more creative strategy is required to ensure delivery of employment opportunities. The DPS is considered to be **unsound** in this respect as it has not had regard to the evidence available, or to the SPPS requirement for development plans to identify mixed use development opportunities.

8.3 By designating a '**Strategic Mixed Use**' zoning at BR05 and adjacent lands, this unsoundness of the DPS will be remedied. Economic development at this location, in association with a range and choice of much needed housing and sustainable active travel will allow this site to make a strategic and meaningful contribution to delivery of the Plan objectives.

**DONALDSONPLANNING**

**March 2026**

## APPENDIX 1 – SITE MASTERPLAN

### PROPOSED MASTERPLAN



### SUMMARY OF POTENTIAL DEVELOPMENT

EMPLOYMENT POTENTIAL (c6-7HA)		
Floorspace	Employment ratios	Number employees
Class B1 4,000m <sup>2</sup>	1 per 12m <sup>2</sup>	333
Class B2 12,000M <sup>2</sup>	1 per 36m <sup>2</sup>	333
Class B4 4,000M <sup>2</sup>	1 per 77m <sup>2</sup>	52
Care/nursing home	1 per 3 beds	26
Community pharmacy/café etc		30
<b>TOTAL</b>		<b>774</b>

RESIDENTIAL POTENTIAL		
FAMILY HOUSING	5HA	125
SOCIAL/AFFORDABLE HOUSING	5HA	125
RETIREMENT HOUSING	3HA	60
AMENITY/GREENWAY	3HA	
<b>TOTAL</b>	<b>16ha</b>	<b>310</b>

**NB: Greenway has now been delivered through these lands, albeit on a slightly different route. Note that there is also potential to extend the lands further to the east or south, beyond BR05, without adverse impact on rural character.**

## **APPENDIX 2**

### **POTENTIAL REMAINING ON BMAP ZONED LAND IN BANGOR (DECEMBER 2025)**

<b>BMAP REF</b>	<b>LOCATION</b>	<b>POTENTIAL @25DPH</b>	<b>NOTES</b>
BR03/11	RATHGAEL	31	c.320 Complete
BR03/07	GREEN ROAD NORTH	105	Under construction. c.20 complete
BR03/10	GREEN ROAD SOUTH	0	Complete
BR04/03	MILLBANK AVE	30	Not started – unlikely to deliver
BR04/06	OLD BELFAST ROAD	8	Not started (tree cover)
BR04/07	SOUTH CIRCULAR	0	Not started – access issues.
BR04/08	UPRICHARD/BALLOO	0	Approved for primary school
BR04/09	BELLS FARM	157	Current application pending since 2022.
BR04/12	ST GALLS	12	c.50 Complete
BR04/13	BALMORAL SQUARE	0	Complete
<b>TOTAL</b>		<b>343</b>	