

## 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:**  
Mr David Mounstephen
2. **Address**  
Fleming Mounstephen Planning, Unit A101, Portview Trade Centre, 310 Newtownards Road, Belfast.
3. **Post Code** (optional)  
BT4HE
4. **Email** (optional)  
[david@fmplanning.co.uk](mailto:david@fmplanning.co.uk)
5. **Phone Number** (optional)  
028 9620 9448
6. **Are you responding as an individual?** (optional)  
*\*Choose exactly 1 option*  
 Yes  
 No
7. **Are you responding on behalf of an organisation?** (optional)  
*\*Choose exactly 1 option*  
 Yes  
 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  
 No
10. **Client Name , address (if applicable):** (optional)  
Julia McLaughlin and Andrew Murdoch c/o 9 Kilmoor Road, Killinchy, BT23 6SB
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.*
12. **Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only):** Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.  
Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

*\*Choose exactly 1 option*

- Written (Choose this procedure to have your representation considered in written form only)
- 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*

- Yes
- X No

**14. If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below. (optional)**

Coherence and Effectiveness Tests – CE 2, CE 3 & CE 4.

**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

No

**16. Test P1 Comments (optional)**

**17. P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made? (optional)**

*\*Choose exactly 1 option*

Yes

No

**18. Test P2 Comments** (optional)

**19. P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal?** (optional)

*\*Choose exactly 1 option*

Yes

No

**20. Test P3 Comments** (optional)

**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

No

**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

No

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

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

*\*Choose exactly 1 option*

Yes

No

**26. Test C2 Comments** (optional)

**27. C3 Did the Council take account of policy and guidance issued by the Department?**  
(optional)

*\*Choose exactly 1 option*

Yes

No

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

**29. C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district?** (optional)

*\*Choose exactly 1 option*

Yes

No

**30. Test C4 Comments** (optional)

**31. Coherence and Effectiveness Tests** (optional)

**CE 1 The DPD sets out coherent strategy, from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils?**

*\*Choose exactly 1 option*

Yes

No

**32. Test CE 1 Comments** (optional)

**33. CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**  
(optional)

*\*Choose exactly 1 option*

Yes

No

#### 34. Test CE 2 Comments (optional)

The comments under CE2 relate to Policies SG4 Strategic Housing Allocation, SG5 Strategic Housing Allocation across Settlements and SG6 Management of Housing Land Release. The CE2 test noted the need for policies and allocations which are 'realistic and appropriate' and are founded on a 'robust evidence base'. The draft Plan Strategy (dPS) is based on a 'growth strategy' to meet 'anticipated needs' (para 1.8), recognizes the trend towards an ageing population (para 1.88) and the need for a mix of housing units and tenures (para 1.95). The dPS also highlights a range of significant challenges including change, uncertainty, high house prices, affordability and changing needs (para 1.115).

The dPS states that a Social Objective is the 'sufficient supply of land to meet diverse housing needs up to 2032' (page 54) and notes the allocation for 15,608 new homes for the Plan period to provide for a 5-year supply and a 10% flexibility allowance. It is considered, in light of the range and nature of significant challenges noted above that the evidence would indicate the need for greater flexibility in relation to the housing allocation for the Plan period. A larger housing allocation would be appropriate in that it would address the range of significant challenges, make allowance for 'non-implementation' (which should be at least 10%) and, importantly, recognize the extended and uncertain period for the adoption of both Parts of the LDP.

It is noted that Technical Supplement 2 states that there is 'no evidence of an over-supply' of housing (para 11.16) and, as such, it is considered that the overall housing allocation should be increased to support the 'growth strategy' which forms the basis of the dPS.

Comber is identified as a 'Small town' in the Settlement Hierarchy (the second tier after Bangor and Newtownards) for the Borough (page 60) and the dPS states that an element of the 'Spatial Growth Strategy' is to 'consolidate the role and function of Comber' (page 59) as a local service centre for housing, employment, facilities and services to support the local population and its rural hinterland.

It is noted that the dPS seeks to direct the majority of the housing allocation (63%) to the principal settlements of Bangor and Newtownards in line with the settlement hierarchy. The allocation to small towns, namely Comber, Holywood, Donaghadee and Portaferry is smaller (22%). Table 6 of the dPS (page 77) notes that the potential housing supply for Comber is somewhat above the housing allocation for the plan period. However, it is noted that existing commitments are below the housing allocation and that the 'potential housing supply' relies on the 'urban capacity potential' and a 'windfall allowance'. It is noted that the footnote (page 77) states that the allocation is indicative, that more detailed analysis will take place at the Local Policies Plan stage including a review of existing zonings, urban capacity sites and infrastructure capacity. It is considered that a larger housing allocation should be allowed for Comber in light of the above in light of the above.

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

*\*Choose exactly 1 option*

Yes

No

#### 36. Test CE 3 Comments (optional)

It is considered that the 'plan, monitor and manage' approach' is a critical element of the LDP process in relation to housing. The dPS includes only a short section on the 'Monitoring Framework' and it is suggested that further detail should be provided to ensure that there are 'clear mechanisms' for implementation and monitoring.

It is suggested that the following should be undertaken in order to make the dPS sound:

(i) a robust assessment at the dPS stage (i.e. in advance of the LPP stage) on whether housing

zonings can be delivered. Critical factors to take into account would be infrastructure constraints which would include foul and storm drainage infrastructure and road infrastructure.

(ii) a robust assessment of the level required for a 'non-implementation allowance' in the overall housing allocation to ensure that it is appropriate for the changing circumstances over the plan period.

The 3 indicators, noted under 'Social Objectives' in the dPS (page 479) relate to the total number of housing units completed across the Borough, the total housing land remaining and the percentage of affordable homes approved. It is considered that an indicator should be included to identify and monitor the matter of significant infrastructure constraints which would adversely affect the delivery of land for new housing required to support the Council's growth ambition. It is suggested that the indicator should focus on significant constraints to the delivery of housing land to ensure that the LDP objectives related to housing can be achieved. In relation to Comber, it is suggested that there is a need for flexibility to respond to changing circumstances over the plan period and maintain an ongoing supply of housing land.

**37. CE 4 It is reasonably flexible to enable it to deal with changing circumstances? (optional)**

*\*Choose exactly 1 option*

Yes

No

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

In light of the comments above on Tests CE 2 and 3, it is considered that the dPS would benefit from greater flexibility to deal with changing circumstances. This flexibility could be provided through a higher housing allocation, the inclusion of a non-implementation allowance and the addition of an indicator to monitor significant constraints to the actual delivery of housing. Flexibility is an essential element not least because of the range of uncertainties and challenges which affect the development plan and development management processes but also the extended period of time to deliver both parts of the proposed LDP.

**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 above – answers to 34, 36 & 38.

**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?

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

Do you have any comments on the draft HRA?

**43. Equality Impact Screening Report** (optional)

Do you have any comments on the EQ screening?

**44. Rural Needs Impact Assessment** (optional)

Do you have any comments on the RNIA?

**45. Please add any additional comments** (optional)

Under the Regional Development Strategy 2025 (RDS 2025) Comber was one of 7 towns identified for expansion around the BMA. Whilst RDS 2025 was superseded by the RDS 2035, which did not include the 7-town expansion strategy, it is considered that the locational characteristics of Comber have not changed and that flexibility, with a higher housing allocation, would be appropriate and would not adversely affect the revitalization of the main towns in the Borough.

In light of the comments made above, it is considered that the lands shown on the attached plan (at 'Bloomfield Hill' accessed via Belfast Road and lands to the north west of Dunsy Way / Linley Drive / Castlehill Avenue) should be included within the settlement development limit (SDL) of Comber. The lands are adjacent to the SDL of Comber and are well located to accommodate any planned expansion of Comber during the plan period. The lands are bounded by existing residential development and inclusion of the lands would represent a natural extension of the SDL. Access can be provided and the topography is suitable for housing development. The lands are not subject to any designations which would preclude residential development.

## **What Happens Next?**

Thank you for your representation to the Local Development Plan draft Plan Strategy (dPS).

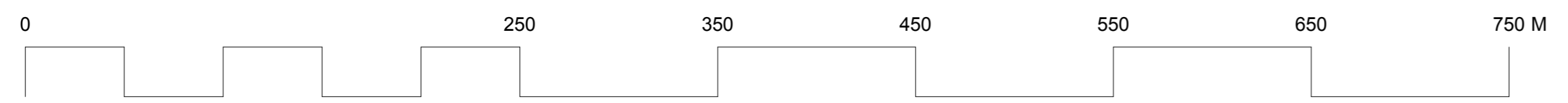
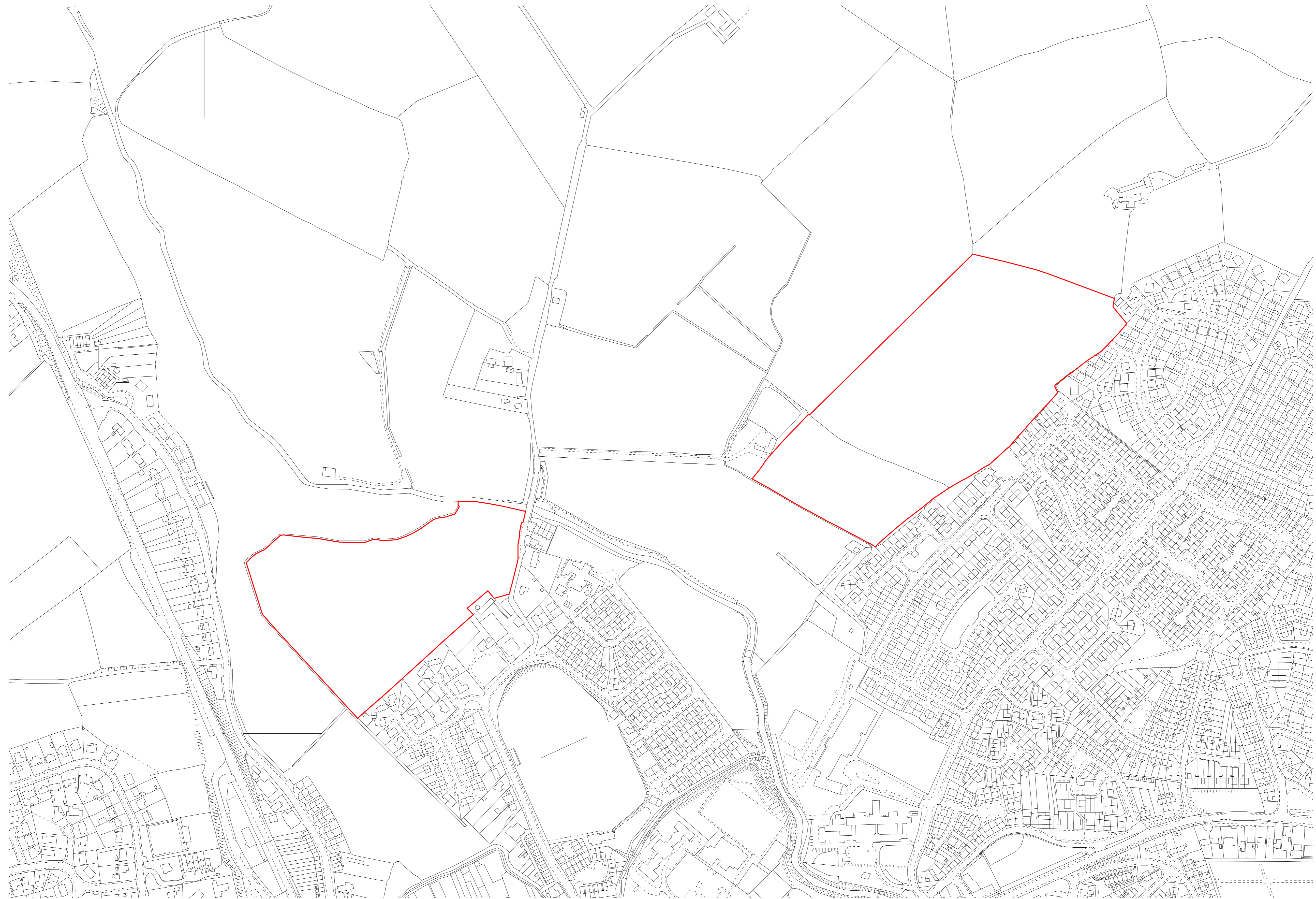
**You will receive a formal acknowledgement letter from the Council's Planning Department**

**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.



**SITE PLAN**  
1:2500 @ A1

