

Local Development Plan, draft Plan Strategy (DPS) Reconsultation - Reconsultation 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 16 January 2026 and closes at 4.30pm on 16th March 2026

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.

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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)

Clandeboye Golf Club

11. Do you wish to upload a document to add to your survey response? (optional)

Please note the maximum size of files that can uploaded is 50MB

This field cannot be completed on paper. Please use the online version of this form instead.

12. Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

**Choose exactly 1 option*

- Written (Choose this procedure to have your representation considered in written form only)
- 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
- No

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

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)

See attached report

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)

See attached report

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)

See attached report

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)

See attached report

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

**Choose exactly 1 option*

- Yes
- No

36. Test CE 3 Comments (optional)

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

**Choose exactly 1 option*

- Yes
- No

38. Test CE 4 Comments (optional)

39. If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound. (optional)

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)

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.

ARDS & NORTH DOWN LOCAL DEVELOPMENT PLAN 2032

Representations to Draft Plan Strategy

Lands adjacent to Summerfield, Conlig



CGC/25
LDP Reps
Final
March 2026

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APPENDICES

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1. INTRODUCTION

- 1.1 This representation has been prepared by Fay Planning Consultancy on behalf of our clients, Clondeboyne Golf Club, in response to the consultation in respect of the Ards & North Down Borough Council (*‘the Council’*) Local Development Plan 2032 Draft Plan Strategy (*‘DPS’*) issued for formal consultation on 17th October 2025.
- 1.2 This representation relates to the growth strategy, the proposed settlement hierarchy, and the distribution of housing land within that hierarchy along with strategic policy and direction in respect of the identification and designation of LLPAs and opens space.
- 1.3 It relates to land that is not currently zoned under the North Down & Ards Area Plan 1984-1995 and the draft BMAP 2015, (in so far as it is still relevant) (see Appendix 1) and responds to the relevant strategy and policy considerations set out in the DPS with particular regard to the site-specific interests.
- 1.4 The consideration of the Council proposals and the preparation of this response to that proposal has taken account of relevant background documents that are material to the consideration of this matter.
- 1.5 For the reasons set out below, it our considered view that the DPS is unsound as the it fails the soundness tests in respect of:
 - Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
 - Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
 - Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
 - Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

2.0 THE PLAN PERIOD

- 2.1 While the Planning Act (NI) 2011 (*'The Act'*) does not set out a prescribed period that the plan should cover, the SPPS does require (paragraph 5.7) that LDPs should set out a long-term spatial strategy. Further, paragraph 2.6 of Development Plan Practice Note 1: Introduction: Context for Local Development Plans (DPPN 1) directs that, among other functions, the LDP should:
- *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;*
 - *facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the well-being of the community; • allocate sufficient land to meet society's needs;*
 - *provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place;*
 - *provide a plan-led framework for rational and consistent decision-making by the public, private and community sectors and those affected by development proposals; and*
 - *deliver the spatial aspects of a council's current community plan:*
- 2.2 The purpose of the LDP therefore is to provide a forward planning framework to direct sustainable growth in the Council area in the years ahead. The National Planning Policy Framework 2025 in England, at paragraph 22, states that:
- "Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."* (emphasis added).
- 2.3 That has led to the Planning Inspectorate in the UK engaging directly with local councils in relation to the LDP timetable to ensure that strategic policies do look ahead for a minimum 15 year period from adoption including the Wiltshire Local Plan as a recent example where discussions between the Inspectorate and the local council are considering what level of extension of the plan period will be required to ensure compliance with national policy and effective due to a delay in the plan process.
- 2.4 That general approach has been followed in Belfast where the Plan Strategy adopted in May 2023 which will guide future investment and development decisions to enable the sustainable spatial growth of the city up to 2035. The DPS for Ards & North Down Borough should be consistent with that approach.
- 2.5 The DPS documents state that the purpose of the Ards and North Down Borough Local Development Plan is to inform the general public, statutory authorities, developers and other interested parties of the policy framework and land use proposals that will guide development decisions within the Borough for a 15-year time frame. However, we are now 8 years into the LDP process and are only at the DPS stage and, going by past experience of other LDP processes the process is unlikely to be completed until near the stated end date of the LDP. That is an unsustainable approach to plan making and is contrary to the overall objective of providing a forward planning framework on which to base development management decisions going forward.

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- 2.6 Extending the Plan Strategy to a 15-year period from adoption would properly fulfil the role of the LDP in providing greater certainty for the Council, infrastructure providers, investors, developers and the public.
- 2.7 An alternative approach to adopting a longer plan period would be to identify additional reserves of land that could provide meet any emerging need by way of an over-allocation of land, in the form of a further flexibility allowance or reserve, as has been accepted practice in other cases including BMAP. Our clients land would offer a reasonable and realistic option to provide such necessary lands to meet anticipated need.
- 2.8 As things currently stand, it is our considered view that the DPS does not provide an appropriate long-term framework to support the economic and social needs of a council's district. The DPS is therefore unsound by virtue of its failure to meet the SPPS requirements to provide a long-term spatial strategy and its failure to fulfil the functions set out in DPPN 1. It is therefore unsound in respect of:
- Consistency Test C3 - failure to take account of policy and guidance issued by the Department.

3.0 DPS HOUSING STRATEGY

Spatial Growth Strategy & Strategic Housing Allocation

- 3.1 We welcome the DPS Strategic Objectives, and particularly the Spatial & Cross-cutting and Social Objectives to:
- 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.
 - To create sustainable places throughout the Borough through design, layout and mix of uses that enhance the character and identity of settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote prosperity, and well-being of citizens.
 - 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.
 - To create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.
 - To support rural communities by providing appropriate and sustainable opportunities for development in the countryside.
 - To build sustainable resilient communities where people have good access to housing, employment, shops, public transport, active travel, healthcare, community and cultural facilities.
 - To improve health and wellbeing - by facilitating health, education, community and cultural facilities in accessible locations and creating places that encourage a healthy lifestyle through the provision of high-quality open space and sporting facilities, informal leisure spaces and increase opportunities to walk, wheel, or cycle.
- 3.2 Further, the Spatial Growth Strategy set out under SGS 1 merits support and in the context of this submission, we particularly welcome the objective to:
- 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.
- 3.3 We agree that the focus of growth in the principal settlements/main towns recognises the need that new development is directed to the most appropriate places and that the scale of development for any given settlement should be commensurate with the capacity of that settlement to support it which will also capitalise on the benefits arising from the efficient use of existing community facilities, services and infrastructure in the large towns and their strategic location on key transport corridors.
- 3.4 We also support the employment-led housing growth strategy as an appropriate approach to the calculation of the level of housing needed to support the job creation targets. However, in the context of our position in respect of the appropriate plan period set out in section 2 of this submission, we are strongly of the view that the number of new homes should be extrapolated upwards to apply to a more appropriate plan period.
- 3.5 The Strategic Housing Allocation proposed for Bangor is 4,508 units under SGS 5 and, taking account of existing commitments, the predicted urban capacity potential and an allowance for windfall, the total potential supply within the settlement is 2,004, leaving a shortfall of 2,508

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units. That shortfall does not factor in any extrapolation, as we say would be appropriate, to allow for proper forward planning over a minimum of 15 years as set out in section 2 of this submission.

- 3.6 Analysis of the available land within the settlement limits but outside the urban footprint as defined for the purposes of the urban capacity study, that could be used for housing, confirms that all of those lands are either developed, under construction or committed through existing planning permissions. That includes 5.23ha around 62 Green Road, currently not developed by subject to a number of extant permissions and applications under consideration.
- 3.7 The Housing Land Availability Study 2024/2025 predicts that there is capacity remaining in Bangor for a further 913 units.
- 3.8 While Conlig is included in the settlement of Bangor, The Settlement Hierarchy & Settlement Evaluation (Technical Supplement 1) recognises it as an ‘urban village’ within Bangor that comprises residential development centred on a group of local facilities that provides a sense of place and local identity and is an important focus for the local community. Conlig also possesses other characteristics of a village including a small ‘retail park’ on Green Road along with a community centre, Medical Centre, hairdresser, off-licence & convenience store, Bangor Auctions, car sales and a building merchant.
- 3.9 Significantly, Conlig has experienced the most rapid rate of residential expansion in recent years, compared to the rest of the town, with new private housing developments at Ardvanagh, Bridgelea, Stonebridge and Beechfield. There is no remaining housing development land available in the urban village.
- 3.10 The Council has also undertaken a consultation exercise in respect of preparing a Village Plan for Conlig. It is advised that the proposed ‘*Village Plan is a non-statutory document which outlines the long-term goals, objectives, and vision for the village. The actions identified in the Village Plan help to co-ordinate development efforts, prioritise investment and ensure there is a clear vision for the future of Conlig*’. That process should also inform the LDP process. The DPS, LPP and the Village Plan should all be consistent in setting out the framework for the future development of Conlig within the larger urban context of Bangor.
- 3.11 In that context of the above, it will be necessary to make provision for appropriate expansion of the settlement of Bangor and Conlig through the LPP stage of the LDP process. At paragraph 2.24 the DPS states that:

“In defining settlement development limits at Local Policies Plan (LPP) stage the main objectives will be to promote and accommodate new development, and also to contain it within the limits in order to maintain a clear distinction between the permissible developable area and the surrounding countryside. Account will be taken of the RDS direction to achieve compact urban forms, concentrate resources and protect settlements from urban sprawl, and against the merging of settlements.”
- 3.12 The strategic policy set out in the DPS should facilitate delivery of that necessary expansion.

4.0 POLICY, SETTLEMENT LIMITS & DESIGNATIONS

- 4.1 The DPS confirms that the review of settlement limits and designations will be undertaken at LPP stage. A total of 101 LLPAs were designated in Draft BMAP 2015 and the Ards and Down Area Plan (ADAP 2015) and these designations will continue to be applied until such time as a review of all existing designations has been completed.
- 4.2 The DPS also confirms that, in defining settlement development limits at Local Policies Plan (LPP) stage the main objectives will be to promote and accommodate new development, and also to contain it within the limits in order to maintain a clear distinction between the permissible developable area and the surrounding countryside. Account will be taken of the RDS direction to achieve compact urban forms, concentrate resources and protect settlements from urban sprawl, and against the merging of settlements.
- 4.3 Our clients' lands (Appendix 1), immediately to the west of established Summerfield development, offers the opportunity for Conlig, as an urban village, to expand in a manner that is consistent with the RDS direction *to achieve compact urban forms, concentrate resources and protect settlements from urban sprawl, and against the merging of settlements.*

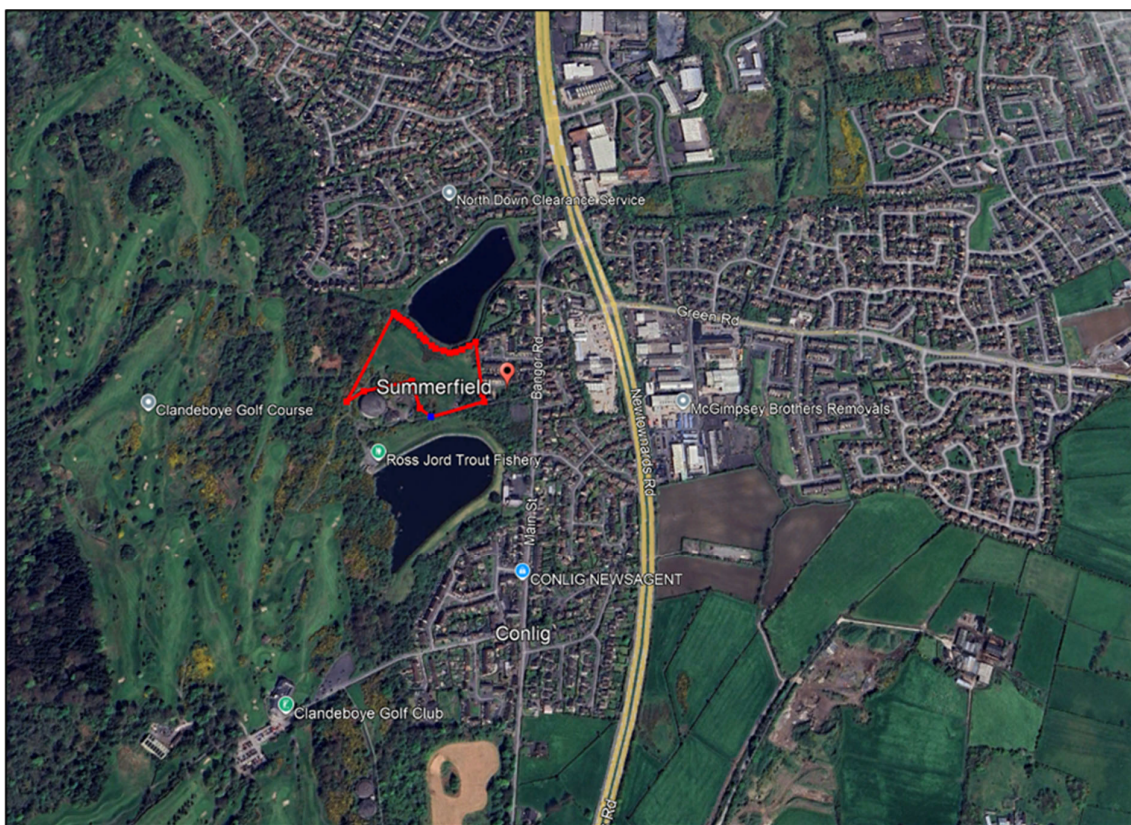


Figure 1: Subject Lands

- 4.4 The lands, comprising c3.0ha are under the ownership of Clandeboy Golf Club (CGC) and were formerly used as practice grounds. With the exception of the southern edge which abuts the access lane, all other boundaries are well defined by mature hedgerows and mature vegetation meaning that they would provide natural boundary features to define the local

settlement limit for Conlig. The current limit abutting Summerfield is defined by a palisade fence and the end of the carriageway which would provide ready access to the subject lands.



Figure 2: Settlement Limit at Summerfield

- 4.5 While it is recognised that the identification of additional lands required for expansion of the settlement will be undertaken at the LPP stage, it is critical that the strategic policy set out in the DPS provides an appropriate context to ensure that the settlement can grow in a sustainable manner.
- 4.6 SPPS (paragraph 6.30) directs that LDPs should, where appropriate, designate LLPAs and bring forward local policies and guidance to maintain the intrinsic landscape, environmental value and character of such areas. It advises further that LLPAs consist of those features and areas within and adjoining settlements considered to be of greatest amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development. They may include:
- archaeological sites and monuments and their surroundings;
 - listed and other locally important buildings and their surroundings;
 - river banks and shore lines and associated public access;
 - attractive vistas, localised hills and other areas of local amenity importance; and
 - areas of local nature conservation interest, including areas of woodland and important tree groups.

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- 4.7 Map 1B accompanying the DPS confirms that the western settlement limit of Bangor at Conlig abuts an LLPA which appears to be adopted from dBMAP 2015 (BR 24 – Clondeboye LLPA) which encompasses a wide area and includes notable features and combinations of features that contribute to the environmental quality, integrity and character of that area for example Helen's Tower, Clondeboye Golf Course and numerous areas of local nature conservation interest.
- 4.8 That generally accords with the feedback to the Council consultation on the Village Plan as summarised in the Council leaflet (Appendix 2). Key points emerging include:
- Green and Blue Connections were seen as the key unique selling points of Conlig, with the Reservoirs, Clondeboye Estate, Helen's Tower, the Lead Mines and the Ulster Way providing great access to recreational opportunities such as walking, cycling and fishing.
 - The Clondeboye Golf Club, which is situated immediately west of Conlig, was identified as another unique attraction. The club offers two courses in the picturesque rural surroundings of Lady Dufferin's Estate and features a club restaurant and bar, providing for both golfers and other visitors.
- 4.9 The Golf Club was established in 1930 and has long been one of Northern Ireland's premier golf courses. This has been achieved by the Club's desire and commitment to continually improve and reinvest in their facilities. The course was completely reconfigured and redesigned in 1969. As part of this significant investment, the club had to purchase additional lands from a third party to create the necessary changes to the first hole. However, as part of that transaction, an additional parcel of land (the subject site) was conveyed to CGC and it was used as an informal practice ground for a number of years. However, it is approximately 1km from the clubhouse and the first tee and logistically is just not suitable as a practice area.
- 4.10 The lands are therefore not used any longer by the Club and have become the location of anti-social activities with young people using it as an informal track for scrambler motor bikes and flytipping with resultant significant detrimental impacts on the amenity of residents in Summerfield and the wider Conlig village area. This has led to a large volume of complaints to the CGC and the PSNI seeking assistance in addressing these problems (See Copy Note at Appendix 3).
- 4.11 The lands are also unkempt and make no positive contribution to the setting of Conlig or the wider Bangor settlement. The development of the subject lands would provide for an appropriate level of growth for the Conlig village within the wider context of the larger town of Bangor and would enable the definition of a more appropriate settlement limit in that locality. The lands are within walking distance of the childcare nursery, community centre, churches, convenience store and bus stops. The Club seeks the opportunity to release this land for development purposes as a method of funding improvements to the facility as part of their drive to increase the attraction of the club to the community as a whole with a particular emphasis on women, children and disabled patrons. In particular the release of much needed funds would enable the improvement of the offer to current members and visitors alike, including:
- Bringing the golf course up to modern standards by allowing practice before stepping onto the first tee.
 - Facilitating the provision of a putting green and chipping facility adjacent to the clubhouse which could be used as a state-of-the-art teaching facility for youths and ladies.
 - Reducing the operational and maintenance difficulties of dealing with a split site operation, particularly where the practice course is not frequently used.

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- Opening up opportunities for the provision of more formal access around and across the golf course and onto the wider features of interest that form the core of the LLPA, defined as *'strategic open space'* in Map 4 of the DPS.
- 4.12 However, in the absence of clearer and more defined criteria for the designation of settlement limits and LLPAs being provided by the DPS, there is a real risk that the existing LLPA designation at this location will act as a definitive constraint to any possible revision/expansion of the settlement limit to allow appropriate growth of Conlig, assisting in delivering additional housing units needed within the wider settlement of Bangor and enabling the delivery of associated substantial social and environmental benefits to the local community.
- 4.13 In that context the DPS needs to provide suitable criteria for the definition of LLPAs. In particular the lands must clearly be of landscape, heritage or wider environmental significance as set out in the SPPS. It should not simply be a case of providing a buffer to settlement where the subject lands offer no other positive contribution to the landscape and heritage interests. In contrast, where the subject lands are included within the revised settlement limit, the settlement limit will be clearly defined by natural features, and the setting of the settlement will be significantly enhanced.
- 4.14 The CGC has previously made submissions to the POP stage of the LDP and raised concerns in respect of the application of regional policy relating to open space. Those concerns still apply. However, the CGC has effectively abandoned any use of the subject lands for recreational purposes and that position should be a material consideration in weighing up open space policy criteria against the proposed extension of the settlement limits to accommodate the projected housing growth requirements. The DPS appears not to have properly considered that representation. The Open Space Strategy does emphasise the importance of high-quality open space:
- *'Support the provision of new high quality open spaces close to where people live, that meet the needs of people of all ages, ability and background; and*
 - *Facilitate and enhance green and blue infrastructure through new provision and the promotion of linkages between existing and planned open spaces, including strategic and local community greenways and blueways'.*
- 4.15 Further, Policy GP 1 – General Principles will support development that *'protects and provides sufficient high quality and useable open space, and links to and integrates with green and blue infrastructure, where practicable.'*
- 4.16 Strategic policy in the DPS should provide sufficient direction and an appropriate framework for the LPP stage for the identification and designation of appropriate opens space both within and adjoining settlements.
- 4.17 As things stand the DPS fails to provide that an appropriate framework and direction in respect of the identification and designation of LLPAs and open space. That could lead to missed opportunities to grow settlements such as Bangor/Conlig in a sustainable manner in line with the overall strategic objectives of the DPS, the RDS and SPPS. In that context the DPS is unsound in respect of:
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
 - Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS

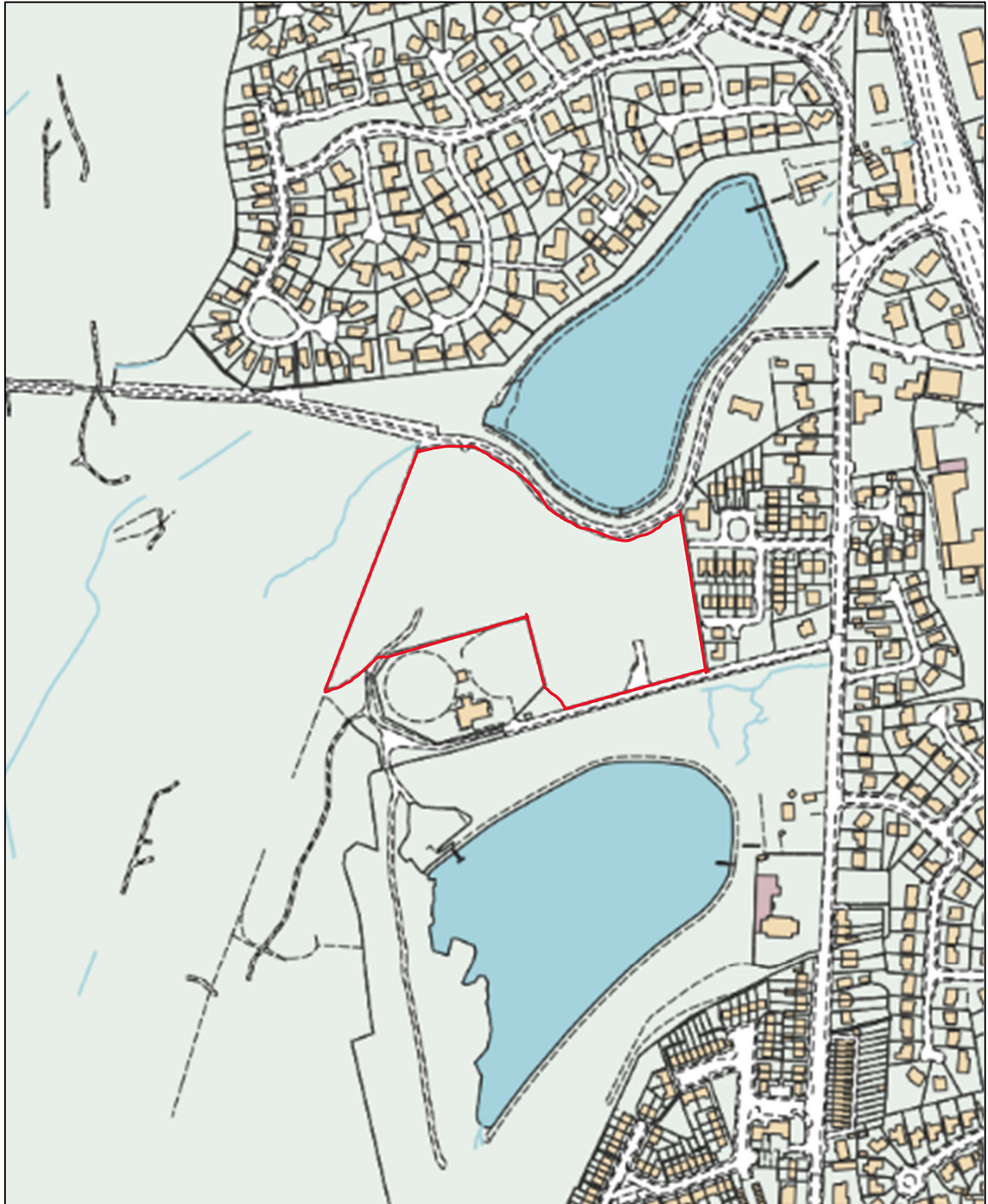
LDP Submission

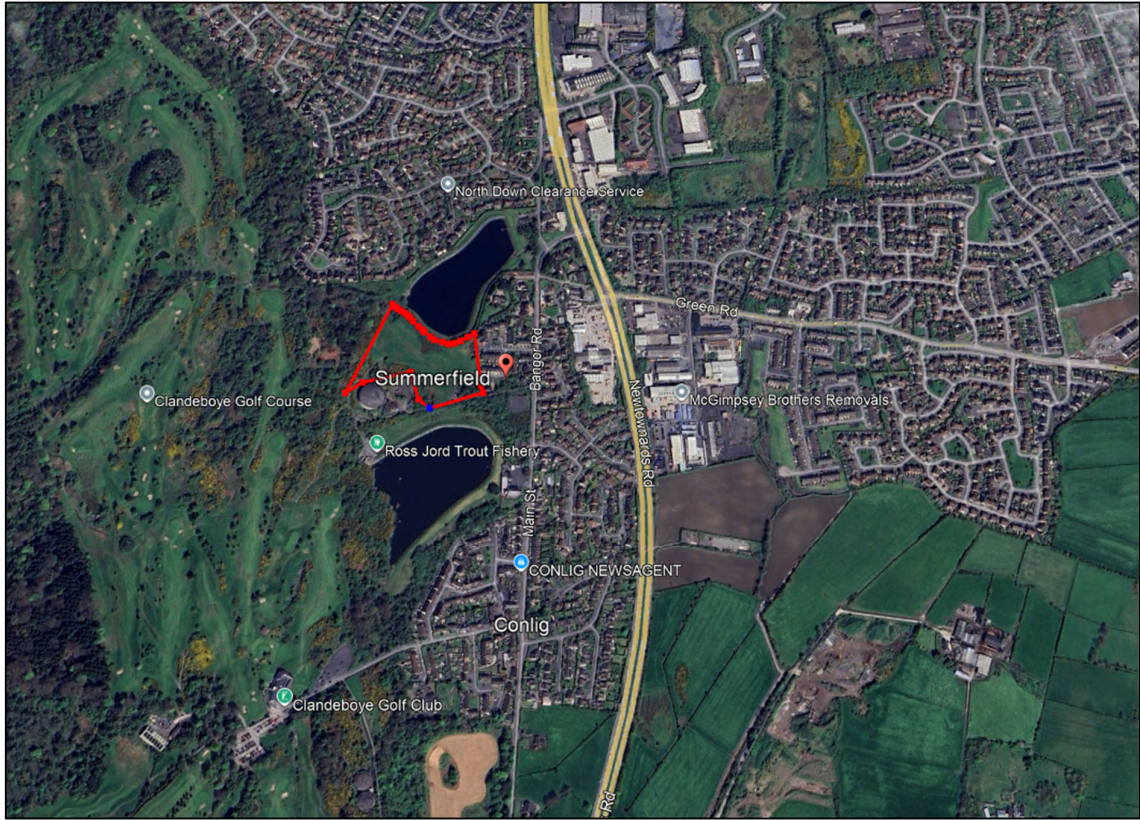
- Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
- Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

5.0 CONCLUSIONS

- 5.1 For the reasons outlined above the DPS is unsound in respect of:
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
 - Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
 - Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
 - Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.
- 5.2 Our client subject lands offer a real option in addressing the DPS shortcomings.
- 5.3 We would welcome further engagement with the Council in respect of these matters.
- 5.4 Our client would wish to participate in any oral hearing into the DPS.

Appendix 1: Subject Lands





Appendix 2: Additional Supporting Information

To whom it may concern,

The Old Practice Ground area has been a source of significant social issues for more than a decade. Since taking up the role of Manager at Clandeboye Golf Club in 2021, I have personally witnessed the ongoing disruption and the negative impact this misuse has had on both local residents and the Club.

Over the past four years, the following incidents have been repeatedly observed:

- Illegal use of trial bikes and scramblers, posing regular and serious safety risks.
- Threats and verbal abuse from individuals using the area for biking purposes, including an incident where four individuals followed me to a petrol station and shouted abusive remarks after being asked to leave the premises.
- Cars being driven recklessly across the ground for joyriding.
- Threatening behaviour towards Club members by certain dog walkers while the area was being used for its original purpose as a golf practice ground.
- Widespread dog fouling, creating hygiene and usability issues.
- Frequent fly-tipping, contributing to environmental and safety concerns.

Attached below is a selection of evidence, consisting primarily of direct messages, videos, and reports sent to Clandeboye Golf Club social media channels.

Both the PSNI and ANDBC Community Relations teams have attended the area on multiple occasions in response to these issues, supported at times by PSNI drone units and bicycle patrol teams.

The persistence of these behaviours continues to undermine the safe and intended use of the Old Practice Ground, and further intervention is required to ensure the wellbeing of the community and the security of the site.

The following screenshots highlight just some of the messages received from residents living close to the area in question. These date from 2020.

PSNI involvement has been required on regular occasions, placing a strain on resources.

Videos are available showcasing many of the illegal biking activities.

Regards

Andrew Adair

Club Manager – Clandeboye Golf Club

Correspondence from ANDBC Neighbourhood Environmental Officer

Dated – 3rd Nov 2025

Good afternoon

Andrew

Following on from our conversation today please see attached photos of the carpet dumped in the wooded area on the right-hand side coming from the Main road, near to the car park . As discussed, you were going to check if this land belongs to Clandeboye Golf club as you thought it may be in the old practice area . I would appreciate it if you can let me know if you own the land and if so could you arrange for the dumping to be removed accordingly . If not, I will check with land registry. Much appreciated.

Regards

Karen

Karen Kenny

Neighbourhood Environment Officer

Pic x 3 attached



