



Richard
Platt

MAIN QUESTION

Name:

Richard Platt

+ ADD TO ANALYSIS

Address

79 Milecross Road, Newtownards,

+ ADD TO ANALYSIS

Post Code

No answer

+ ADD TO ANALYSIS

Email

No answer

+ ADD TO ANALYSIS

Phone Number

No answer

+ ADD TO ANALYSIS

Are you responding as an individual?

Yes

+ ADD TO ANALYSIS

Are you responding on behalf of an organisation?

No

+ ADD TO ANALYSIS

Organisation and Job Title (if applicable):

No answer

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+ ADD TO ANALYSIS

Client Name , address (if applicable):

No answer

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+ ADD TO ANALYSIS

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.

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



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Soundness of the Plan

No

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

No answer

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Procedural Tests -

Yes

+ ADD TO ANALYSIS

Test P1 Comments

No answer

+ ADD TO ANALYSIS

P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?

No

Test P2 Comments

The Council has failed to adequately address the 2019 POP representations regarding the under-allocation of housing land in West Newtownards. Despite significant evidence from professional planners suggesting that the growth strategy is too modest, the DPS maintains a restrictive approach that does not account for the deliverability of edge-of-settlement lands.

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P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal?

Yes

+ ADD TO ANALYSIS

Test P3 Comments

No answer

+ ADD TO ANALYSIS

P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD

Yes

+ ADD TO ANALYSIS

Test P4 Comments

No answer

+ ADD TO ANALYSIS

Consistency Tests

No

+ ADD TO ANALYSIS

Test C1 Comments

The Plan fails to align with the RDS objective of promoting sustainable commuter patterns. By restricting growth in West Newtownards, the Plan forces cross-town traffic for those working in Belfast, contradicting the RDS goal of reducing transport-related carbon emissions

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Test C2 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test C3 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test C4 Comments

No answer

+ ADD TO ANALYSIS

Coherence and Effectiveness Tests

No

+ ADD TO ANALYSIS

Test CE 1 Comments

The strategy is internally inconsistent. It aims for economic growth but restricts the housing supply in the most accessible commuter corridors (the West), which will drive up house prices and stifle the local labor market.

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CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

No

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Test CE 2 Comments

The housing allocations are not founded on a robust evidence base. The Plan relies on 'stagnant' legacy sites in East Newtownards that have failed to deliver for years. It ignores more 'realistic' alternatives, such as the 8-acre site off Manse Road/Kempe Stones Road, which is shovel-ready and contiguous with the urban fabric

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+ ADD TO ANALYSIS

Test CE 3 Comments

No answer

+ ADD TO ANALYSIS

CE 4 It is reasonably flexible to enable it to deal with changing circumstances?

No

+ ADD TO ANALYSIS

Test CE 4 Comments

The Plan lacks flexibility. By drawing rigid settlement limits that exclude viable, low-impact sites in the West, the Council cannot respond to shifts in housing demand or the failure of other zoned sites to come forward.

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

To make the Plan Strategy sound, the Council should:

Re-evaluate the Housing Growth Study: Increase the housing allocation to reflect actual market demand and the strategic importance of the Belfast-Newtownards corridor.

Amend Settlement Limits: Revise the urban boundary at West Newtownards to include the lands at Kempe Stones Road/Manse Road. This provides a logical 'rounding off' of the town and utilizes land that minimizes cross-town traffic.

Prioritize Deliverability: Policy should favor sites that are immediately deliverable and can support Sustainable Drainage Systems (SuDS), such as the 8-acre parcel mentioned, rather than relying on constrained sites that require heavy infrastructure intervention

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Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy?

No answer

+ ADD TO ANALYSIS

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

The Sustainability Appraisal fails to fully weight the environmental benefits of prioritizing development in West Newtownards (e.g., Manse Road/Kempe Stones Road) over Eastern sites. The SA should more explicitly consider the carbon reduction achieved by placing housing closer to the main Belfast commuter corridors (A20), which reduces total vehicle miles travelled compared to development on the eastern fringes of the town

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draft Habitats Regulations Assessment(HRA)

The HRA should ensure that the focus on existing zoned sites in the East does not overlook the potential 'in-combination' effects on the Strangford Lough protected areas. Strategically shifting some growth to the Western side of Newtownards (which is topographically separated from the most sensitive parts of the Lough drainage basin) could serve as a mitigation strategy to reduce direct environmental pressure on European designated sites.

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Equality Impact Screening Report

The EQIA and the Plan Strategy do not sufficiently address housing affordability for young professionals and families who work in the Belfast Metropolitan Area but wish to live in Newtownards. By restricting the supply of deliverable land in the West (the most desirable commuter location), the Plan risks indirectly discriminating against younger age groups by artificially inflating house prices due to a lack of flexible, available land

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Rural Needs Impact Assessment

The RNIA fails to recognize that 'edge-of-settlement' lands in West Newtownards act as a vital transition zone. Including sites like the 8-acre parcel at Manse Road within the settlement limit would not negatively impact rural needs; rather, it would prevent 'urban sprawl' deeper into the countryside by providing high-density, sustainable development in a logical, contained location already influenced by the existing urban fabric.

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Please add any additional comments

This representation is submitted to highlight that the Draft Plan Strategy is currently unsound because it is not the 'most appropriate strategy when considered against reasonable alternatives' (Test CE2). The 8-acre site off Manse Road / Kempe Stones Road is a reasonable and superior alternative to many of the legacy sites currently included in the Plan. It is deliverable, sustainable, and supports the Council's own stated goals for SuDS and traffic management. I request that this site be formally considered for residential/mixed-use zoning to ensure the Plan meets its housing delivery targets in a geographically balanced way.

Example tag 1 +

Example tag 2 +

From: Richard Platt [REDACTED]

Sent: 16 March 2026 12:19

To: General, Planning <planning@ardsandnorthdown.gov.uk>

Subject: Formal Representation to the Draft Plan Strategy (DPS) – Soundness Objection

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi, can you please accept the below submission for the DPS consultation. I will also submit this online so please feel free to remove one to avoid duplication.

Many thanks indeed

Richard Platt

To: LDP Planning Team, Ards and North Down Borough Council

Date: 16 March 2026

Subject: Formal Representation to the Draft Plan Strategy (DPS) – Soundness Objection

Site Reference: Lands at Kempe Stones Road / Manse Road (Approx. 8 Acres)

1. Introduction & Soundness Test I wish to submit a formal objection to the Soundness of the Draft Plan Strategy. Specifically, I contend the plan is **Unsound** under **Test CE2 (Realistic and Appropriate)** and **Test CE4 (Flexibility)**.

2. The Argument: West vs. North and East Development The current Plan Strategy fails to provide a robust evidence base for the distribution of housing.

- **Sustainability & Commuting:** Strategic growth has been unwisely weighted toward the East of Newtownards. Residents in the North and East must transit through the town centre to reach Belfast, increasing congestion and carbon emissions.
- **The "West Newtownards" Advantage:** Lands to the West, specifically at the Kempe Stones / Manse Road corridor, offer immediate access to the A20. Development here aligns with the Regional Development Strategy (RDS) goals of sustainable transport and reducing commute times.

3. Evidence from Previous Consultations I support the arguments previously raised (in the 2019 POP Consultation) which stated that:

- The Council's housing growth targets are too modest and do not reflect the actual demand in the Belfast Metropolitan Area.
- The Plan relies on "stagnant" sites that have failed to deliver housing for years. My site represents a **deliverable, shovel-ready alternative**.

4. Site Specifics To remedy this unsoundness, the Council should extend the Settlement Limit to include my **8-acre parcel at Kempe Stones Road/Manse Road** (see attached map, bordered in red). This site is:

- **Physically contained:** It provides a logical "rounding off" of the town boundary.
- **Infrastructure Ready:** It can accommodate Sustainable Drainage Systems (SuDS) as per the Council's preferred options, and does not require the heavy infrastructure intervention needed for northern and eastern sites.

5. Conclusion The Draft Plan Strategy is currently too rigid. I request that the settlement limits be reviewed to favor sustainable, West-end growth prior to the adoption of the Local Policies Plan.

Regards,
Richard Platt
79 Milecross Road,
Newtownards,

Newtownards

