

MAIN QUESTION

Name:

Keith Russell

+ ADD TO ANALYSIS

Address

58 Queens Parade
Bangor

+ ADD TO ANALYSIS

Post Code

BT20 3BH

+ ADD TO ANALYSIS

Email

[REDACTED]

+ 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

+ ADD TO ANALYSIS

Are you an Agent responding on behalf of a client?

Are you an Agent responding on behalf of a client?

No

+ ADD TO ANALYSIS

Client Name , address (if applicable):

No answer

+ ADD TO ANALYSIS

+ 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)

+ ADD TO ANALYSIS

Soundness of the Plan

No

+ ADD TO ANALYSIS

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

Please see written submission

+ ADD TO ANALYSIS

Procedural Tests -

Yes

+ ADD TO ANALYSIS

Test P1 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

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

Yes

+ ADD TO ANALYSIS

Test P2 Comments

Albeit a 'moment in time' exercise

+ ADD TO ANALYSIS

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

Yes

+ ADD TO ANALYSIS

Test C1 Comments

No answer

+ ADD TO ANALYSIS

C2 Did the Council take account of its Community Plan?

No

+ ADD TO ANALYSIS

Test C2 Comments

See submission

+ ADD TO ANALYSIS

C3 Did the Council take account of policy and guidance issued by the Department?

Yes

+ ADD TO ANALYSIS

Test C3 Comments

No answer

+ ADD TO ANALYSIS

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?

No

+ ADD TO ANALYSIS

Test C4 Comments

See submission

+ ADD TO ANALYSIS

Coherence and Effectiveness Tests

Yes

+ ADD TO ANALYSIS

Test CE 1 Comments

No answer

+ ADD TO ANALYSIS

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

+ ADD TO ANALYSIS

Test CE 2 Comments

See submission

+ ADD TO ANALYSIS

CE 3 There are clear mechanisms for implementation and monitoring?

Yes

+ 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

Need's to be clearer in relation to private development

+ ADD TO ANALYSIS

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

See attached submission

+ ADD TO ANALYSIS

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)

See attached submission

+ ADD TO ANALYSIS

draft Habitats Regulations Assessment(HRA)

No answer

+ ADD TO ANALYSIS

Equality Impact Screening Report

No answer

+ ADD TO ANALYSIS

Rural Needs Impact Assessment

No answer

+ ADD TO ANALYSIS

Please add any additional comments

No answer

Example tag 1 +

Example tag 2 +

I am submitting this representation in response to the Draft Plan Strategy for the Ards and North Down Local Development Plan 2032.

The borough's coastal towns possess a distinctive character that is closely connected to both their historic town centres and their waterfront setting. The protection and sensitive management of listed buildings within town centres should remain a key priority within the strategy. These historic properties contribute significantly to the identity and heritage of the area and play an important role in supporting tourism, local pride, and the overall vitality and viability of the town centre.

The seafront also represents one of the borough's most valuable environmental and recreational assets. As an important gateway landscape for residents and visitors, the waterfront should prioritise high-quality public realm, attractive landscaping, and accessible green space that enhances enjoyment of the coastal environment. Maintaining visual openness and protecting views of the sea will help preserve the distinctive character that makes these areas special.

At the same time, it is recognised that town centres must remain accessible in order to support local businesses and community activity. Adequate and well-located car parking therefore continues to play an important role in maintaining town centre vitality and viability. However, the location and design of such infrastructure should be carefully considered to ensure that it supports accessibility while protecting the environmental quality and amenity of sensitive coastal areas and not block/restrict pedestrian access.

Development along the seafront should therefore be planned in a way that respects the character and setting of the waterfront, enhances public space, and safeguards the residential amenity of nearby properties.

Strengthening these principles within the Draft Plan Strategy would help ensure that future development supports both economic vitality and the long-term protection of the borough's valued coastal environment.

Overall, the Draft Plan Strategy presents an important opportunity to reinforce the unique qualities of the borough's coastal towns. Protecting the historic character of town centres, enhancing green and recreational space along the seafront, carefully managing development within key waterfront areas, and safeguarding residential amenity will help ensure that future growth supports both community wellbeing and the long-term attractiveness of the coastal environment.

The inclusion of clearer policy emphasis on protecting coastal character, enhancing seafront green space, and ensuring that supporting infrastructure is sensitively located would strengthen the effectiveness and overall soundness of the Draft Plan Strategy.

Please note that these comments are made in the context of the Draft Plan Strategy's stated objectives to protect the character of town centres, enhance public open space, and maintain the environmental quality of coastal areas, and aim to support the achievement of these objectives in a way that strengthens the overall effectiveness and soundness of the strategy.

Addressing these considerations would help ensure that the Plan Strategy delivers high-quality places while protecting the distinctive coastal character that is central to the identity of the city of Bangor.

The plan should address concerns regarding:

1. Protection of Open Space (Marine Gardens)

* **Policy OS1 (Protection of Open Space):** This policy presumes against the loss of open space to other uses. I would argue that a private car park does not provide the "substantial community benefit" required to justify the loss of existing green infrastructure.

* **Strategic Objective (Environmental Stewardship):** the new proposal by the contractor contradicts the plan's objective to enhance quality of life and "environmental stewardship" by removing mature urban greenery.

2. Impact on B2 Listed Buildings

To protect the setting of the seafront homes:

* **Policy HE1 (Listed Buildings):** This policy focuses on protecting listed buildings and their settings. Any future plans should balance the "special architectural or historic interest" of the B2 listed terrace by assessing noise, light pollution, and a visual character that is inconsistent with a historic seafront.

* **Strategic Objective (Inclusive Placemaking):** the plan should also prioritise "inclusive placemaking" by clearly assessing the future applications which intend to prioritise private vehicle storage over the preservation of the Borough's unique coastal heritage.

3. Town Centre & Sustainable Transport

* **Policy DES1 (Design in Town Centres):** Any new development must contribute positively to the "sense of place" and character of Bangor's town centre.

* **Policy TRA2 (Parking Standards):** The plan should challenge the "need" for future car parks and further prioritise sustainable travel and zone existing facilities (like the Flagship Centre) before destroying seafront green space.

At present, the Plan is Unsound because it is Inconsistent with regional policy (SPPS) and Ineffective in protecting the Borough's unique coastal heritage and green infrastructure as outlined above.