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ARDS & NORTH DOWN LOCAL DEVELOPMENT PLAN 2032

COUNTER REPRESENTATION

to

DRAFT PLAN STRATEGY REPRESENTATIONS (relating to Ballygowan)

July 2026
project no. 843

INTRODUCTION

This counter representation has been produced to address concerns relating to the future settlement development limit for Ballygowan and to highlight concerns with a number of the representations for zoning of lands in the area. With the council's target for providing housing in the region of 15,000 dwelling units within the plan period it is critical that suitable lands are zoned to help facilitate this. There is little point in zoning lands which require substantial input in terms of infrastructure for access (roads) and drainage, and where environmental, ecological and archaeological issues are difficult to address in a meaningful manner. It is also beneficial for newly zoned lands to be natural extensions of the settlement development limit and to tie in appropriately with the existing urban grain and infrastructure in as seamless a manner as possible.

REPRESENTATIONS FOR SITES IN BALLYGOWAN

We have noted the following representations for zoning of lands in the Ballygowan area and have provided some comment on the submissions:

DPS-025 – Somerville Consulting – Lands on each side of Ballygowan Road (north east of Ballygowan)

It is noted that this representation provides no information on these lands – it is simply an area outlined on an aerial view map. While these lands are remote from the existing settlement development limit and would not be a natural continuation, or extension, of the existing settlement development limit, they are at least, it seems, accessible from Ballygowan Road.

DPS-038 – Donaldson Planning Ltd – Lands at Carrickmannon Road & Moss Road (south of Ballygowan)

This representation provides reasonable detail on these two site and points out that both parcels of land benefit from good access and connectivity to the facilities in the centre of the village. This representation does highlight that the draft Plan Strategy fails to provide policies or allocations which are realistic and appropriate in relation to Ballygowan. It states that *'The evidence base shows that Ballygowan is the largest in the 'village' tier by some margin, and that in terms of both population and NISRA categorisation it should be regarded as a 'small town', with its own specific housing allocation'*.

DPS-039 – Donaldson Planning Ltd – General Housing concern issues relating to Ballygowan. See last couple of sentences in DP-039 above

DPS-065 – GT Design – Lands to north of Ravara Road (west of Ballygowan)

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. The land does sit along the existing settlement development limit and may be accessible from Ravara Road. The lands do not appear for have access links from the adjacent, existing, housing developments.

DPS-098 – H Scott – Lands at to South East of Ballygowan (south of Comber Road and the Carson Road / Carsons Avenue housing development).

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. It is also noted that these lands are remote from the existing settlement development limit and would require other, 'in between', lands to be zoned first, or at least an access road provided through the 'in between', as yet, unzoned lands. Ballygowan River is also very close to these lands and would be a cause of concerns in terms of flooding.

DPS-099 – H Scott – Lands to the east of Ballygowan (south of Comber Road and beside the local Wastewater Treatment Works).

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. While these lands do bound the existing settlement development limit on two sides, north & west, the land is effectively landlocked and inaccessible. There is undeveloped land to the north and with the treatment works to the west it is difficult to see how suitable access can be provided. The Ballygowan River also runs along the north boundary, creating concerns in terms of flooding risk.

DPS-114 – H Scott – Lands to the north west of Ballygowan (on west side of Belfast Road and with Tullygarvan Road curving round, and forming, its south and west boundaries)

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. These lands are certainly accessible from the Tullygarvan Road and convenient to the Belfast Road, however zoning of these lands extends the village further along the Belfast Road when more integral sites could be used to round off the settlement development limit, instead of encouraging it to sprawl into the countryside. This site would be quite remote from the heart of the village and the local facilities.

DPS-115 – H Scott - Lands to the north west of Ballygowan (on other side of Tullygarvan Road from the site in DP-114 above)

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. These lands are certainly accessible from the Tullygarvan Road and convenient to the Belfast Road, however zoning of these lands extends the village further into the countryside when more integral sites could be used to round off the settlement development limit instead of encouraging it to sprawl. This site would be quite remote from the heart of the village and the local facilities.

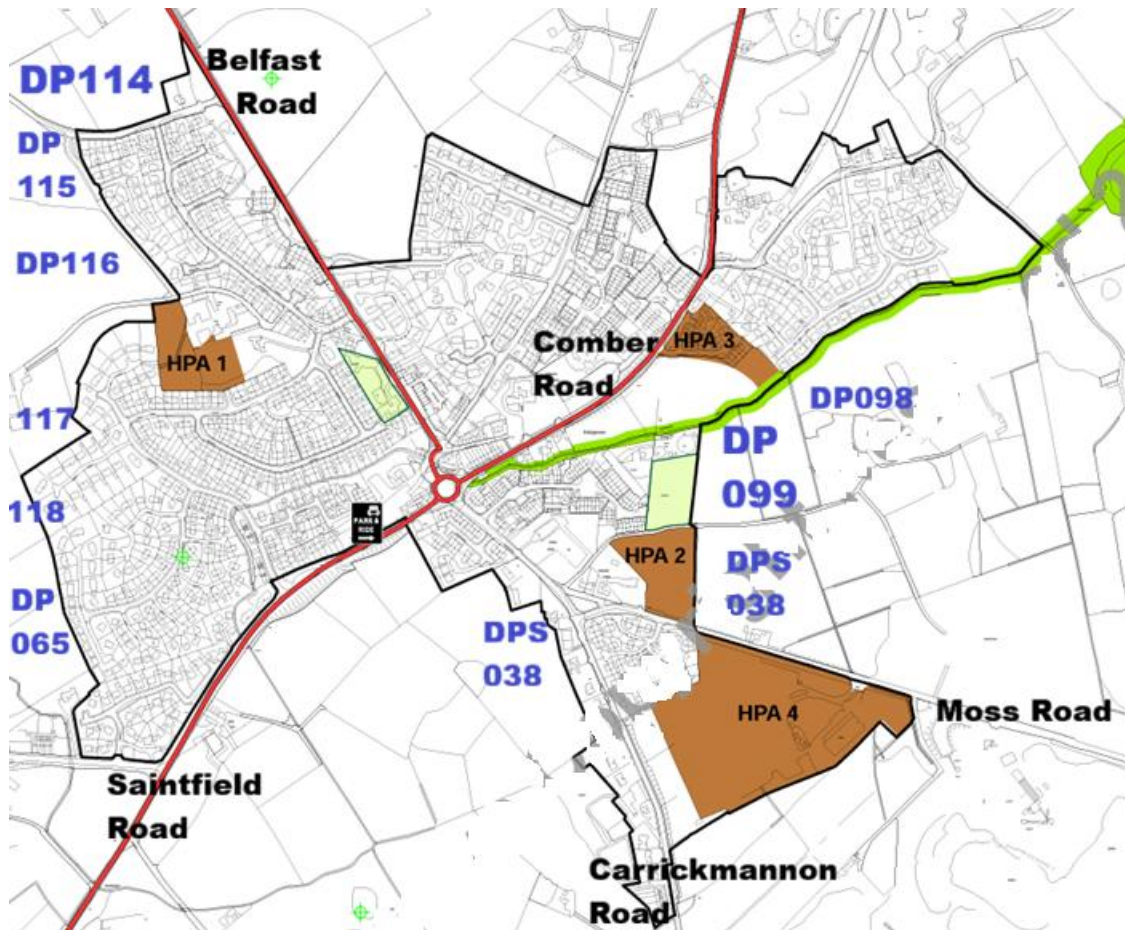
DPS-116 & DP117 – H Scott – Lands to the north west of Ballygowan (just south of the land mentioned in DP115 above)

It is noted that these representations provide no information on these lands – it is simply an area outlined on the map. These lands are possibly accessible from the Tullygarvan Road (depending on ownership of the lands in DP115 above) and also possibly accessible from some of the existing housing developments to the east. Part of these lands can be looked on as 'rounding off' the settlement limit.

DPS-118 – H Scott – Lands to the west of Ballygowan (to the west of Lime Tree Heights, off Meadow Way, off Saintfield Road and south of lands mentioned in DP115, DP116 & DP117)

It is noted that this representation provides no information on these lands – it is simply an area outlined on the map. These lands appear to be difficult to access, even from the existing housing development to the east and have no obvious connection to existing roads – unless access can be provided through the lands mentioned in DP115, DP116 & DP117 above.

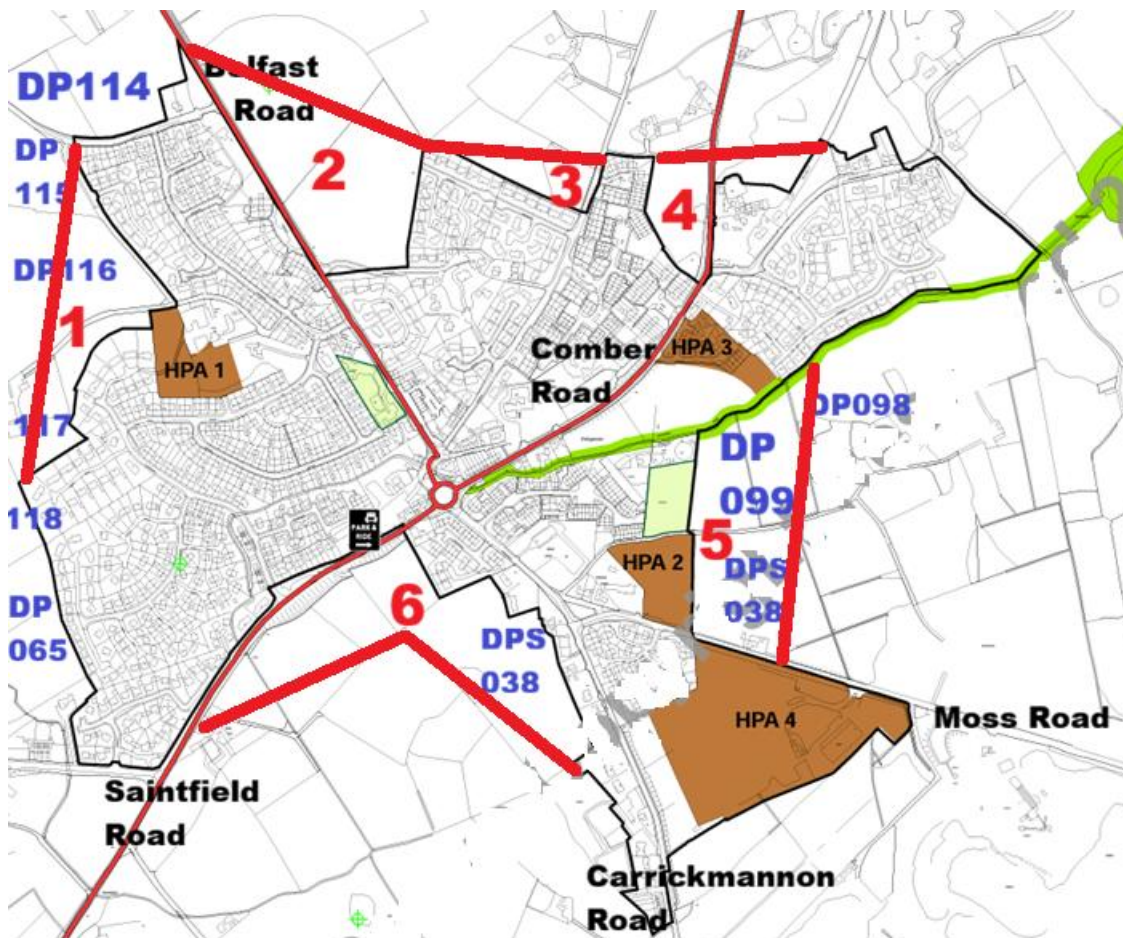
The map of Ballygowan, below, clarifies the locations of the above mentioned DPS sites (some references have been abbreviated due to space constraints on the map). Note that the DPS-025 lands mentioned above are not indicated on the map below, simply because they are too remote from the existing settlement limit.



CONCLUSION

In simple terms, suitable 'rounding-off' of the settlement development limit is a valid consideration for the efficient, sustainable and natural growth of a settlement (hamlet, village, town or city). By means of 'rounding off', more meaningful integration of development can take place, with closer links to the existing urban grain and infrastructure. This generally means more efficient, simple and logical, tying into existing services and more efficient use of existing means of access (i.e. footpaths, roads etc.). The map below demonstrates an approximate 'rounding-off' for Ballygowan. While this is quite a 'broad brush stroke' in attempting to demonstrate 'rounding-off', it does bring some clarity to sites (such as some of those DPS sites mentioned above) which are too isolated / remote / disconnected to be considered suitable for future zoning.

Some of these lands, being proposed for zoning, are dependent on other lands being zoned, or at least need access through other, as yet, unzoned lands.



Number 1 to 6, in red, indicate more natural areas for zoning of future lands. Obviously other considerations need to be factored in, in order to fully assess suitability for zoning. However, the key issues must be the need to avoid 'urban sprawl' into the countryside and to efficiently compact and contain development of the settlement in a sustainable manner.

While each land zoning needs to be considered on its own merits, it is clear, that where land is most suitably located for development, and does not require much additional infrastructure or services, in order to be developed, then the decision to zone that land is relatively straightforward and obvious.

In conclusion we would also draw attention to the comments made in the DPS-038 and DPS-039 representations, which raise concern about the designation of Ballygowan. These representations state *'The evidence base shows that Ballygowan is the largest in the 'village' tier by some margin, and that in terms of both population and NISRA categorisation it should be regarded as a 'small town', with its own specific housing allocation'*.