

Our Reference

Your Reference

6 July 2026

LDP Team
Ards and North Down Borough
Council
2 Church Street
Newtownards
BT23 4AP

Scottish Provident Building
7 Donegall Square West
Belfast
Co Antrim BT1 6JH

T: 028 9091 8410
F: 028 9091 8201
E: admin@pragmaplanning.com

Dear Sir/Madam

**Ards and North Down Borough Council Local Development Plan
Counter Representation to Representation Numbers DPS-24, 29, 31, 58, 59, 62, 95, 103 and 106**

The Council, in a statement on its website, has sought the submission of counter representations to the site specific representations received to the Local Development Plan Strategy in accordance with Regulation 18 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015. Regulation 18 provides that any person may make a representation about a site-specific policy representation (referred to as counter representations) and the Council's statement continues to indicate that counter representations must not propose any further changes to the development plan document.

As a result, this counter representation does not propose any alterations to the development plan document but simply relates to the parcels of land included within the above referenced representations. The above representations relate to parcels of land to the south, southeast and east of Bangor and collectively total approximately 208ha of land. At a build rate of approximately 20dph that would accommodate the required infrastructure, landscape buffers, public open space and other amenity required by large housing zonings that would equate to 4160 dwelling units and the loss of 23ha of zoned employment land – the last major undeveloped employment area in Bangor. Not all of the 208ha of land should be zoned for housing; some of it should be retained in its present employment use for example whilst some should remain in agricultural use as it would represent unsustainable development in locations that protrude into the countryside, mar the distinction between rural and urban areas and create ribboning development whilst some are not well integrated either physically or in terms of services and amenities. That is not to say that some land to the southeast should not be zoned for housing to create a balance of development and choice of location for purchasers.

The Council's stated position is to retain the residents that live in the Borough and commute out of it for work, whilst also creating more employment opportunities and residents within the Borough to take up those opportunities. None of which will be achieved through the loss of major areas of employment land which should be retained in the larger settlements particularly where that is an existing large undeveloped strategically located zoning such as that to the south of Bangor at Conlig (BMAP Zoning BR05. This land is accessible by vehicular transport from both Bangor and Newtownards and is located on the main arterial road link between the Borough's two largest settlements and is also connected by main road network to Belfast and beyond without the need to travel through any town centre. The retention of such parcels of land for employment purposes will be critical in the creation of employment opportunities and therefore the retention of the existing and future residents of the Borough and to prevent the commuting nature of the population of the Borough.

The land to the southeast and east of Bangor is poorly located and peripheral for housing development and it is not well connected to the City Centre or other community facilities by modes of transport other than private car.

The land to the west of Bangor represents a much better connected location with access not only to the road network linking Bangor to Belfast and beyond but also to multiple bus services and critically for sustainability also to the rail network with stops at Bangor West and Carnalea in close proximity.

The land which is the subject of this counter representation, as illustrated on the attached drawings is immediately adjoining the existing settlement limit of Bangor and would form a discrete rounding off of the development limit and which would integrate into the landscape, would not visually diminish the landscape wedge between Bangor and Crawfordsburn and which would accommodate a discreet group of dwellings.

The land is bounded on three sides by non-rural development typologies that include housing development to the north and east, that housing is within the existing settlement development limit (hence the site is bounded on the north and east by the settlement limit) and sport and recreation to the west in the form of Bryansburn Football Club, a vital local community sports club that provides significant benefit to the population of the Bangor area in terms of health and wellbeing.

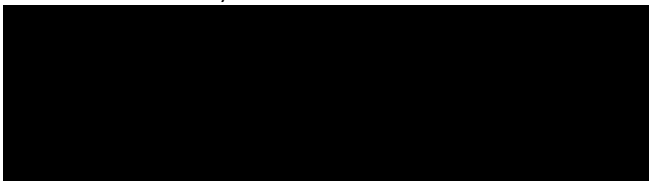
This site is approximately 4.4ha and capable therefore of accommodating around 85-90 dwellings of which around 20 could be affordable units. It has excellent road frontage with ample visibility and the potential to significantly improve the public footpath along the road frontage from Bangor to the end of the football club's frontage. This land is within 1km of Carnalea train station and is well served by bus services numbers 1 and 502a that travel along Crawfordsburn Road.

This site is well connected to community and retail facilities in the form of Bryansburn FC, St. Gall's Church and Carnalea Woods. Slightly further away is West Church, and Carnalea Golf Club to the east and north east, whilst approximately 1km to the west is Crawfordsburn and all of its amenities including The Crawfordsburn Inn and Country Park. To the east are Rathmore Spar which is approximately 850m away and Springhill Retail Park which is around 1.5km away, both distances are by road. Rathmore Nursery School is approximately 1km by road to the east. Clifton School and Bangor Sportsplex are both to the south and are no more than 2.5km away by road.

The attached indicative layout illustrates how the site might be developed for housing either in a single phase or potentially in two phases with the north portion included within Phase 1 lands and the remainder being retained in strategic reserve in Phase 2 as also illustrated on the attached indicative amended development plan map.

We trust this is an adequate explanation of our client's position.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Michael Worthington FRICS MRTPI
For and on Behalf of Pragma Planning and Development Consultants Ltd