

Our Reference

Your Reference

6 July 2026

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Dear Sir/Madam

**Ards and North Down Borough Council Local Development Plan
Counter Representation to Representation Numbers DPS-25, 38, 39, 65, 98, 99, 114, 115, 116, 117 & 118**

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 around Ballygowan and collectively total approximately 50ha of land the majority of which is located to the west and northwest of Ballygowan. 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 1000 dwelling units.

Ballygowan has four existing zoned Housing Policy Areas (HPA1-HPA4), of those HPA3 is developed to the fullest extent so as to avoid the flood plain; and HPA4 is also developed to the fullest extent.

Whilst HPA1 and 2 remain undeveloped; HPA2 is impacted on by the extended WwTW to the north and limited frontage on to Moss Road to facilitate visibility splays and suitable access arrangements which may provide insight as to why it remains undeveloped as it is undevelopable; leaving only HPA1 to provide a 5 year housing land supply for the whole of Ballygowan. HPA1 has an extant planning permission approved in December 2023 (due to expire in December 2028) for 40 units. It is clear that 40 units would be insufficient to provide for a 5 year housing land supply for Ballygowan.

The Council's housing land availability review document – Housing Land Availability Report – provides figures for build rates and the available quantum of land remaining in Ballygowan and is published annually. These reports indicate that in the period between 2020 and 2025 there were 18 units constructed in Ballygowan and the total remaining potential for new residential units increased from 81 to 91 units. There does not appear to be justification for why, despite dwellings being constructed the remaining potential increased over the 5 year period.

Of the representations submitted in Ballygowan (representation numbers provided above) many of those are very peripheral to the town, would require significant infrastructure to provide access and services and would significantly increase the number of journeys by private car to access the facilities and amenities of the town that are mainly located in the centre of the urban area. In particular representations 25, 39, 65, 98, 99, 114, 115, 116, 117, 118 are all peripheral in nature with some of those being totally detached from the current settlement limit.

Representation 25 appears largely detached from the town, is land on which there are no tangible natural boundaries, and which would be visually intrusive into the rural area.

Representations 65, 114-118 appear to lie on elevated land that would lack visual integration, would be more prominent and therefore less capable of integration into the town.

Representation 65 and 99 are located within the flood plain of the river that flows through Ballygowan.

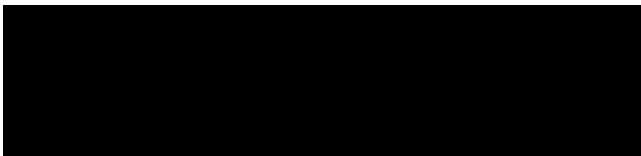
Representations 38 (Moss Road), 98 and 99 are impacted by the proximity of the upgraded WwTW, with access to 98 and 99 severely curtailed and reliant on representation 38 (Moss Road) to deliver access. Representation 98 appears to apply no regard to field or other natural boundaries.

It is not explicitly clear how access to the site included in representation 38 (Carrickmannon) can be accommodated, the location indicated is on the inside of a bend where visibility splay may be difficult to provide and may require 3rd party lands.

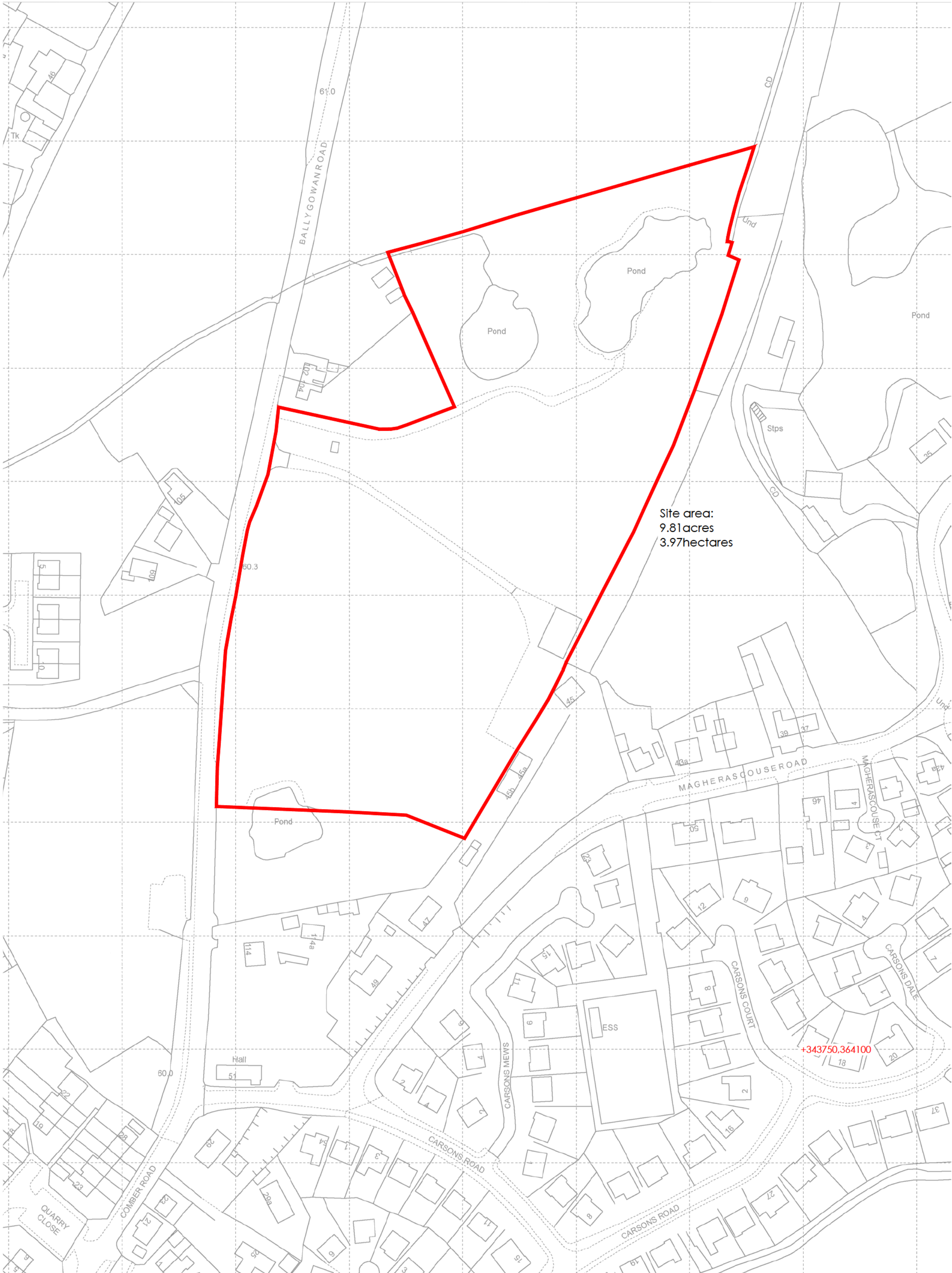
Our client's lands by contrast lies into the settlement of Ballygowan, is not prone to flooding nor is it located within the flood plain, it is not on overly prominent ground and has good road frontage to Ballygowan Road and is well screened by natural vegetation. It is bounded by Ballygowan Road to the west, the former railway line to the east and Ballygowan settlement limit to the south. It is ideally placed to provide Ballygowan with a good supply of quality housing.

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 Limited



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CLIENT		
Gary Jones		
PROJECT		
Ballygowan Road, Ballygowan		
DWG TITLE	SCALE/S	
Location plan	1:1250 @ A2	
DATE	DRAWN BY	JOB NO
03-07-26	AH	F4728-050-02-03-001

REVISION	DESCRIPTION	BY	DATE

PLANNING	☐
BUILDING CONTROL	☐
RECORD	☐
FOR APPROVAL	☐
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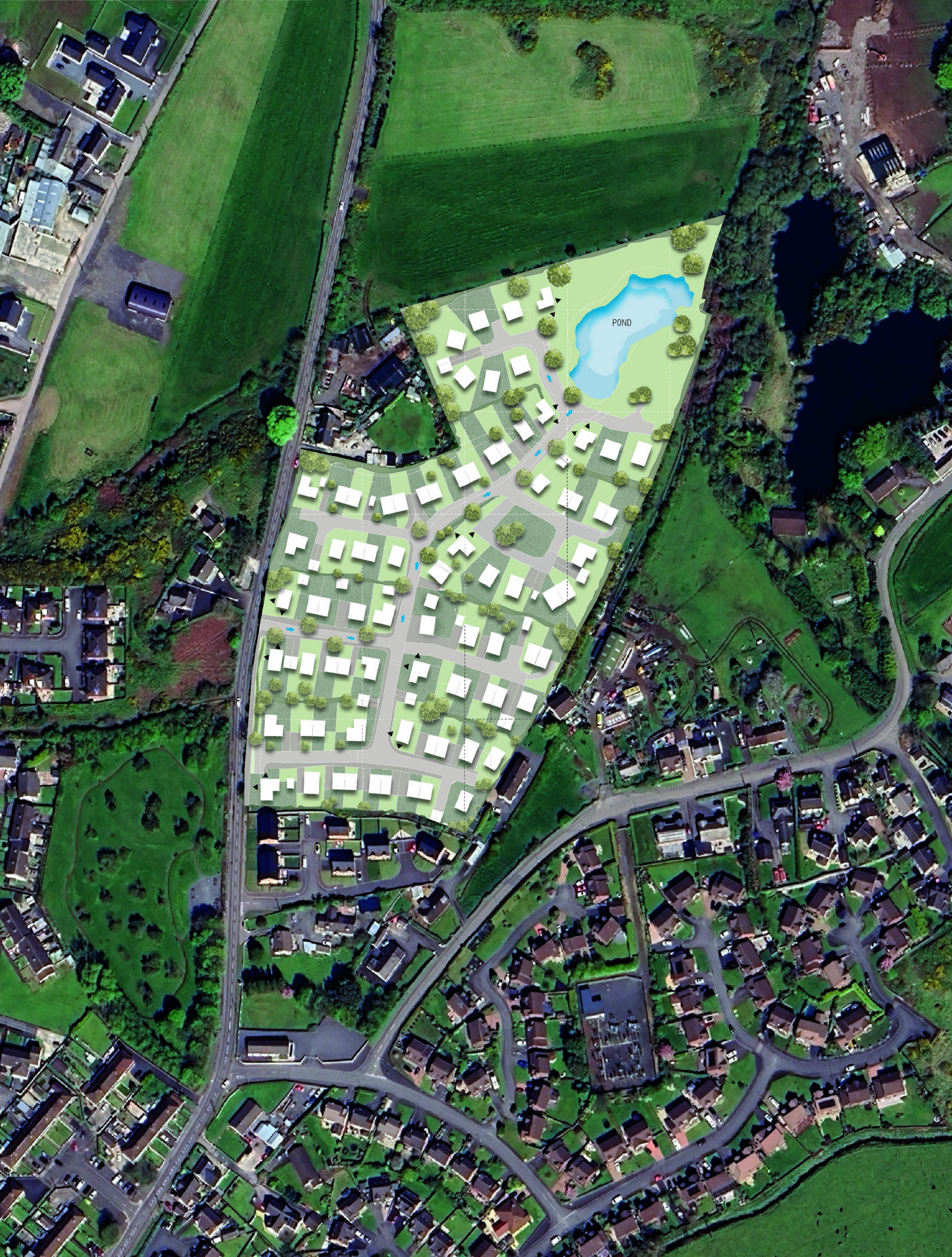


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Lands at
Ballygowan Road, BALLYGOWAN



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CLIENT		
Gary Jones		
PROJECT		
Ballygowan Road, Ballygowan		
DWG TITLE	SCALE/S	
Illustrative concept plan	1:1250 @ A2	
DATE	DRAWN BY	JOB NO
03-07-26	AH	F4728-050-02-03-003

REVISION	DESCRIPTION	BY	DATE

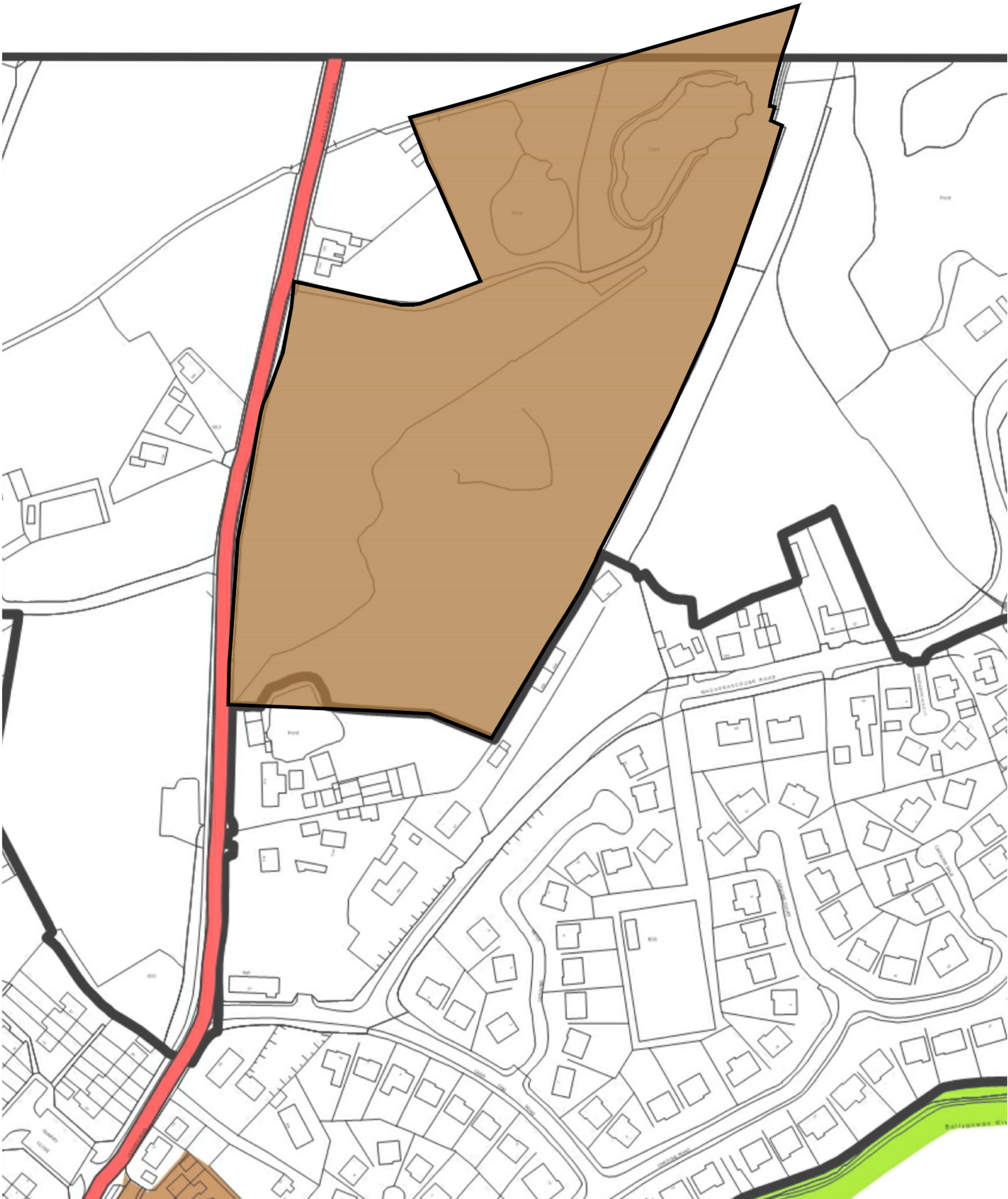
PLANNING	☐
BUILDING CONTROL	☐
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FOR APPROVAL	☐
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Gary Jones		
PROJECT		
Ballygowan Road, Ballygowan		
DWG TITLE		SCALE/S
Area plan		1:1250 @ A2
DATE	DRAWN BY	JOB NO
03-07-26	AH	F4728-050-02-03-002

REVISION	DESCRIPTION	BY	DATE

PLANNING	☐
BUILDING CONTROL	☐
RECORD	☐
FOR APPROVAL	☐
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