

Local Development Plan, draft Plan Strategy (DPS) - dPS Counter Representation Period

Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

Counter Representation Survey Form

In accordance with Regulation 18 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 the Council is undertaking public consultation on site specific policy representations.

The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the draft Plan Strategy as a result of representations submitted under Regulation 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

The Statutory Consultation period opens on 08 May 2026 and closes at 4.30pm on 7 July 2026

Responses to be returned to the LDP team at
2 Church Street , Newtownards BT23 4AP
or by email to planning@ardsandnorthdown.gov.uk

Respondents should note that Counter representations are only permitted in response to an existing representation which seeks a change to the DPS. They must not propose any changes to the development plan document.

Each submission must include the reference number of the representation being addressed in the counter representation, along with a clear explanation of the reasons for making the counter-representation.

Appearance at Examination in Public

The "right" to appear before and be heard by the person carrying out the Independent Examination (IE), does not apply to a person who has made a counter representation.

However an independent examiner may invite anyone to appear before and be heard at the examination if the examiner thinks that person's oral evidence is likely to materially assist in determining the soundness and sustainability of the development plan document.

Soundness

A key feature of the local development plan system is 'soundness' which requires the development plan document to be tested in terms of content, conformity and the process by which it is produced, at independent examination (IE).

The tests of soundness are based upon three categories which relate to how the development plan document (DPD) has been produced, the alignment of the DPD with central government regional plans, policy and guidance, and the coherence, consistency and effectiveness of the content of the DPD.

More information on Soundness is available :[Development Plan Practice Note 6 Soundness](#) .

1. Name:

Richard Platt

2. Address

79 Milecross Road, Newtownards

3. Post Code (optional)

4. Email (optional)

5. Phone Number (optional)

6. Are you responding as an individual? (optional)

**Choose exactly 1 option*

☐ Yes

☐ No

7. Are you responding on behalf of an organisation? (optional)

**Choose exactly 1 option*

☐ Yes

☐ No

8. Organisation and Job Title (if applicable): (optional)

9. Are you an Agent responding on behalf of a client? (optional)

**Choose exactly 1 option*

☐ Yes

☐ No

10. Client Name , address (if applicable): (optional)

11. Have you submitted a Representation to the Council regarding the draft Plan Strategy

**Choose exactly 1 option*

☒ Yes

☐ No

12. Please provide the LDP Representation Reference Number that this Counter Representation is in response to

DPS-106

13. Do you wish to upload a document to add to your survey response? (optional)

Please note the maximum size of files that can uploaded is 50MB.

Please note your counter representation should be submitted in full and cover all the information, evidence, and any supporting information necessary to support/justify your submission.

This field cannot be completed on paper. Please use the online version of this form instead.

14. Counter Representation Reason

Please explain the reasons for your counter representation, focusing specifically on the relevant soundness test(s) set out in the Department for Infrastructure's *Development Plan Practice Note 06: Soundness*.

I write in response to representation DPS-106 (Turley, on behalf of Gibson Family), and in support of my own representation DPS-097 (Richard Platt), which seeks release of land at Kempe Stones Road/Manse Road, Newtownards. DPS-106 relies on the Council's headline Table 6 figure showing a Newtownards housing land "surplus" of 948 dwellings to 2032. This figure should be treated with caution and does not justify withholding release of land at Kempe Stones Road/Manse Road.

The 948 figure assumes all identified supply — existing commitments, urban capacity sites, and windfall — will deliver in full and on schedule. This is not supported by the evidence. Independent site-by-site analysis submitted elsewhere in this consultation round (representations DPS-107, DPS-111 and DPS-112, all Turley, on behalf of three separate clients) each conclude that Newtownards is already 583 homes behind its allocated requirement, and projected to fall a further 1,038 homes behind by 2032 — a cumulative shortfall of 1,621 homes, not a surplus.

This is corroborated by Department of Finance housing stock data showing the Borough as a whole already 2,086 dwellings behind its "success scenario" trajectory as of 2025.

Given this weight of independent evidence, reliance on a theoretical, best-case supply figure to resist new allocations in Newtownards — including at Kempe Stones Road — is not soundly evidenced and fails Test CE2 (evidence-based) and CE4 (flexibility to respond to changing circumstances).

What Happens Next?

Thank you for your counter representation to the Local Development Plan draft Plan Strategy (dPS).

You will receive a formal acknowledgement letter from the Council's Planning Department . We will issue this within 7 working days of your response.

This is in addition to the acknowledgement auto-generated by the Go Vocal system.

Representations received during the public consultation stages of the Plan Strategy and Local Policies Plan, must be made available for public inspection, in the main council offices and on the Council's website, as required by Legislation.

Representations will also be shared with an Independent Examiner such as the Planning Appeals Commission and the Department for Infrastructure as part of the Local Development Plan Examination Process.