PLANNING APPEALS COMMISSION
The Planning (Northern Ireland) Order 1991

Article 7

PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE
BELFAST METROPOLITAN AREA PLAN 2015

REPORT ON NORTH DOWN BOROUGH COUNCIL AREA

by

Commissioners E Kinghan, A McCooey, A Speirs & M Jones

Date of Report: 26th September 2011
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APPRAOCH TO KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the Plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal informatics or planning conditions to be attached to every site without any thought as to whether they are actually key to the development of the individual site or not. We shall also address the situation where the matters specified are addressed by regional policy and so the key site requirements are merely duplication.

Acceptable Uses

We consider that there may be cases where the range of acceptable uses should be specified in the form of key site requirements. This would normally relate to employment or mixed use sites. The list of acceptable uses on employment sites that do not have specified uses, however, should be set out in the strategic employment section of the Plan and cross-referenced in each District Volume.

Density

PPS12 requires minimum density levels to be set for housing sites within urban footprints and other sites as deemed appropriate. Maximum densities may also be specified where required. For this reason we consider that density does not need to be specified in every case. Where density has not been proposed as a key site requirement, it will be for the Department to consider if it is appropriate to include it in the adopted Plan. For the purposes of calculating the estimated yield from objection sites we have worked on the basis of a density of 25dph unless otherwise specified. It will be for the Department to consider individual proposals in accordance with regional policy where no density is specified.

Transport Assessment

Transport assessment is addressed by Policy AMP 6 of PPS3 and requires developers to submit a transport assessment, where appropriate. We therefore consider that there is no need to include this as a key site requirement. Furthermore, many key site requirements in the Plan specify the highway improvements considered necessary. We consider that this may pre-judge the outcome of the transport assessment process. We note that paragraph 4.7 of PPS3 allows for the possibility that necessary infrastructure improvements may not be identified until the planning application stage. The Plan should only specify matters that are known to be a constraint to development i.e. the development could not proceed without certain highway works being undertaken or additional public transport being provided, etc.

We note that key site requirements often indicate that the layout shall provide for cycle and pedestrian links. We consider that this is a requirement of regional policy and should be addressed in the concept plan for the site and the transport assessment.
Similarly the Plan often specifies that an Article 40 agreement may or will be required to ensure that necessary highway improvements and local facilities are provided. There may be other means of achieving such provision. The issue is covered in general terms in GP 5 of PPS13, which states that developers should bear the costs of transport infrastructure necessitated by their development. An Article 40 agreement can be required at application stage should it prove necessary and we do not consider that specific reference to Article 40 agreements is necessary as a key site requirement.

**Landscaping**

Many of the landscaping requirements read as planning conditions. They are certainly not unique or key to the individual site. We consider that the retention of existing vegetation, buffer planting to the settlement limit and maintenance of open watercourses are covered by regional policy in PPS7 and are matters that can be addressed in the concept plan and at the detailed application stage. Guidance is also found in Creating Places and DCAN 8. Landscaping should only be included as a key site requirement in appropriate circumstances where there is a particular issue unique to the site in question.

**Flood Risk**

PPS15 states that development plans will not bring forward sites or zone land that may be susceptible to flooding unless in the most exceptional circumstances (paragraph 6.4). The Plan attaches an almost standard requirement for a flood risk assessment for many zonings. We have several difficulties with this approach: most fundamentally that land at risk should not be zoned. In any case flood risk assessment is required by PPS15 where relevant. We consider that the Department should have assessed whether sites fall within a floodplain as part of the preparation of the Plan. We do not endorse this type of key site requirement and consider that this is a matter addressed by regional policy and guidance in PPS15.

Notwithstanding the Department’s stated approach to objection sites where flooding is an issue, the correct approach is set out in regional policy. A site may be ruled out if it lies totally within the floodplain. If the extent of the floodplain is not known a flood risk assessment is a requirement of regional policy. Drainage assessment is a requirement of Policy FLD 3 in PPS15 and key site requirements of this nature are a duplication of that policy and are unnecessary.

**Concept Plans**

Planning Policy Statement 7 requires the submission of Design Concept Statements so we shall not impose this key site requirement. We may specify matters to be included in the Concept Statement. There may be instances where we consider that in line with Planning Policy Statement 7 a Concept Master Plan should be required to guide development of the site. We will indicate what matters need to be included in the Master Plans in order to address the complex issues involved given the scale of the site.
Housing

Housing recommendations will identify those sites to be held in the Short Term Land Reserve. Other sites recommended for inclusion in the Plan, including those within development limits, will be required to meet the Housing Growth Indicator and should be incorporated into the adopted Plan to meet needs to 2015.

Social Housing

We have recommended that the Department reviews housing zonings and objection sites recommended for inclusion in order to assess their suitability for social housing. It will be for the Department to impose key site requirements related to social housing on appropriate sites in the adopted Plan.

NOTES

Each volume follows the sequence of the relevant volume of the Plan i.e. objections to the settlement limits, then housing zonings, employment, etc.

Following the Department’s publication of the final version of PPS21, all proposed Green Belt designations in the Plan were withdrawn. We have not therefore considered objections submitted in respect of Green Belt designations or policies.

We have only provided plans identifying sites where a change to the Plan is recommended and clarification is necessary as to the extent of the site.
### List of Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>AOCMD</td>
<td>Area of Constraint on Minerals Development</td>
</tr>
<tr>
<td>AONB</td>
<td>Area of Outstanding Natural Beauty</td>
</tr>
<tr>
<td>AOHSV</td>
<td>Area of High Scenic Value</td>
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<tr>
<td>ATC</td>
<td>Area of Townscape Character</td>
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<tr>
<td>AVC</td>
<td>Area of Village Character</td>
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<tr>
<td>BCC</td>
<td>Belfast City Council</td>
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<tr>
<td>BHA</td>
<td>Belfast Harbour Area</td>
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<tr>
<td>DOS</td>
<td>Development Opportunity Site</td>
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<tr>
<td>EHSSB</td>
<td>Eastern Health and Social Services Board</td>
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<td>HGI</td>
<td>Housing Growth Indicator</td>
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<tr>
<td>HPGD</td>
<td>Historic Park, Garden and Demesne</td>
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<td>LLPA</td>
<td>Local Landscape Policy Area</td>
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<tr>
<td>LOTS</td>
<td>Living Over the Shop</td>
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<tr>
<td>MEL</td>
<td>Major Employment Location</td>
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<tr>
<td>NDAAP</td>
<td>North Down and Ards Area Plan</td>
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<td>NDBC</td>
<td>North Down Borough Council</td>
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<tr>
<td>NIHE</td>
<td>Northern Ireland Housing Executive</td>
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<tr>
<td>NITHC</td>
<td>Northern Ireland Transport Holding Company</td>
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<tr>
<td>PPS</td>
<td>Planning Policy Statement</td>
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<tr>
<td>PSRNI</td>
<td>A Planning Strategy for Rural Northern Ireland</td>
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<tr>
<td>RDS</td>
<td>Regional Development Strategy</td>
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<tr>
<td>RLW</td>
<td>Rural Landscape Wedge</td>
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<tr>
<td>RSPB</td>
<td>Royal Society for the Protection of Birds</td>
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<tr>
<td>SLNCI</td>
<td>Site of Local Nature Conservation Importance</td>
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<td>STLRR</td>
<td>Short Term Land Reserve</td>
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<td>TA</td>
<td>Transport Assessment</td>
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<td>TS</td>
<td>Technical Supplement</td>
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<td>TPO</td>
<td>Tree Preservation Order</td>
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<td>ULW</td>
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BANGOR

OBJECTIONS TO THE SETTLEMENT LIMIT

General objection to the Bangor settlement limit
(Objections 2003 & 3198/1)

Objection 2003 stated that the SDL for Bangor severely limits the potential growth of the town as it offers limited areas for development. The objection was also to the Protected Routes denoted on Map No.3a in the Draft Plan. Objection 3198 stated that there was a severe lack of additional green field lands within the settlement development limit of Bangor. We have considered the strategic issue of housing land availability in Part 1 of our report. In the absence of specific lands being identified for inclusion we are unable to give further consideration to the settlement limit in the context of these particular objections. Other individual objection sites will be considered in the remainder of the report. Protected routes are not designated by development plans. The role of the latter is merely to identify them for information purposes. We cannot therefore consider the matter further. We recommend no change to the Plan as a result of these objections.

Lands at Crawfordsburn Road
(Objections 2788, 3123, 3125, 3736, and 3830)

Our conclusions on the housing land allocation for Bangor are set out in Part 1 of our report. We have stated elsewhere that we do not consider that greenfield land should be designated as a DOS for housing. The objector confirmed that the northern portion of site 2788 does not include lands to the west of Ballywooley Lane. There are various overlaps between sites 2788, 3123, 3125 and 3736, all of which lie to the east of Ballywooley Lane. Only objection site 3830 extends westwards, beyond the latter. The Department indicated its view that an amended SDL, contiguous with Ballywooley Lane, would be appropriate and would not prejudice the function of the RLW ND 04 separating Bangor and Crawfordsburn.

Ballywooley Lane is located to the western side of St Gall’s church and is a private road, serving a number of existing dwellings. The lane is bounded by significant trees and hedges along almost its entire eastern side and the majority of its western side. Land to its east is fairly level, with substantial areas of housing abutting most of its length. Much of the land to the west of the lane is rising. Although the lane does not extend along the whole of the boundary of site 3736, the western side of that land is defined by a high hedge and trees.

There was no objection seeking inclusion of St Gall’s within the SDL, although that land is clearly already developed. The same is also the case for the cluster of residential properties on the eastern side of Ballywooley Lane between objection sites 3123 and 3125. In respect of the remaining land on the eastern side of the lane, we would agree with the Department’s analysis that Ballywooley lane would represent a strong, defensible and logical settlement limit at this location. Development on the sites would visually relate with the existing housing to the east, much of which is open to view from the objection lands. The main views of the lands are from Crawfordsburn Road; from which the visual impact of development would be very limited due to the existing trees.
and hedges on Ballywooley Lane, and intervening topography. It would be for the Department to consider if the limit should be drawn to incorporate all the existing development to the east of the lane. If these lands were to be considered as a single entity, they could potentially provide over 200% of the housing allocation to meet the required HGI allowance for the entirety of North Down. However, we consider the northern part of site 2788 (referred to as 2788/1A by the Department), which overlaps with 3123, to be a discrete and self contained parcel of land with well defined boundaries that could be considered as an extension to the settlement in its own right. There is existing development to its south and west. It would result in a logical extension to Bangor and would consolidate the urban limit at this location. It would yield approximately 67 units and should be zoned for housing to assist in meeting the HGI target. We consider that the remaining objection lands should be held in the Short Term Land Reserve (STLR) for the district and released only if required.

We see no reason why the development limit should extend to include objection site 3830, which would result in a protrusion of development into the countryside and RLW with a less logical urban edge, notwithstanding the current recreational use of land immediately to the west and the building thereon. We take a similar view in respect of the presence of the reservoir and telecommunications mast on adjacent land as these are features commonly seen in rural areas. We do not consider the crest referred to by the objector as a logical edge to the settlement. We see no need to mirror the settlement limit on the northern side of Crawfordsburn Road.

With regard to the counter objectors’ points, we do not consider that the access arrangements to serve the objection lands would result in unacceptable traffic congestion in this part of Bangor. There is no evidence to suggest that the infrastructure necessary to support housing on the lands, could not be provided. Development of the land would not have any significant additional impact on air quality, the health of the community or the tourist economy. We consider that loss of these lands from the Rural Landscape Wedge would not result in any significant erosion, either visually or physically, of the substantial area of countryside separating Bangor and Crawfordsburn. Development would be no closer to Crawfordsburn than the existing St Gall’s Church on the southern side of Crawfordsburn Road and housing within the SDL on the northern side.

With regard to the suggested KSRs, the issues raised by the Department, including access arrangements, can be dealt with at the development management stage. There is clearly a need to avoid development on the small portion of floodplain within site 3125/3736 and a KSR to this effect is justified. We consider it particularly important that the existing vegetation on Ballywooley Lane is retained. It will be for the Department to determine if a KSR requiring an element of social housing within the sites is justified.

**Recommendation**

We recommend that objection site 2788/1A - 3123 is zoned for housing and that sites 2788/1B, 3125 and 3736, relating to lands to the east of Ballywooley Lane, are held in the STLR for housing. Any development should be subject to KSRs as follows:

- The mature vegetation along the Western boundaries of the sites shall be retained and augmented to provide an appropriate landscaping buffer.
• No development shall take place on the fluvial floodplain within the objection lands.

**Land at Rathgael Road**  
(Objections 3555/1 & 4)

The objections related to the exclusion of the site from the Bangor settlement development limit and its inclusion within the Clandeboye LLPA. The objector sought zoning of the site for development purposes and referred to the inadequate housing allocation for Bangor.

The site comprises a two storey listed dwelling, Ava Cottage and its grounds, located on the south side of Rathgael Road. The site extends to approximately 3.1 Ha. The roadside boundary is defined by mature trees and hedge, providing screening for the site within. The land itself slopes down from north to south and comprises well kept grassland with trees and vegetation scattered throughout.

We consider that development of the site would necessitate the removal of mature roadside vegetation which would detrimentally expose the site. The road provides a defensible settlement limit and development of the site would read as an illogical protrusion of the urban area into the countryside. We consider that the site is not suitable for inclusion within the settlement development limit and should remain in the rural area.

The site contains mature trees, many of which are along the boundaries. The listed Ava Cottage and its surroundings contribute to the character of the Clandeboye LLPA designation. Its removal from the LLPA and zoning for housing would harm the overall integrity of the LLPA, which we consider to be justified. We consider that the site should remain within the proposed LLPA designation. We recommend no change to the Plan.

**Land at Conlig**

**Objection 2189**

This site is located to the immediate west of zoning BR 02/30, on the western side of Bangor Road. It comprises an area of gently undulating, neatly mown grassland with vegetation to parts of the boundaries. There are reservoirs to both the northern and southern sides and treed open countryside to the west. The objection sought zoning of the site for housing and deletion of the BR 24 LLPA designation thereon. We note that the Department considered the site suitable for inclusion within the settlement; however, its analysis was that the site would result in urban sprawl. The presence of the reservoirs was seen as a mitigating factor.

Our conclusions on the housing allocation to North Down are contained in Part 1 of our report. Reservoirs are features not commonly found within urban limits and we note that there is no objection seeking inclusion of these and the lands to the north and south of the site within the SDL. In our opinion the reservoirs visually relate to, and form a part of, the countryside, and their eastern boundaries represent natural limits to the settlement. Irrespective of the existing definition of the SDL along the eastern edge of
the site, we do not consider that the land between the reservoirs reads naturally as part of the urban area. Housing thereon would be seen as a salient of development, extending into the rural area, and would result in urban sprawl. The site would not contribute to the achievement of compact urban form. We do not accept that the site is an undeveloped pocket within the urban footprint, or similar in character to zoning BR 02/41, as argued by the objector. Its development would not result in a rounding off of the SDL. We disagree with the Department’s position and consider that the site should remain outwith the settlement.

The reservoirs to the north and south are included within the LLPA and there are no related objections to these elements of the designation. There is public access along the northern edge of the site via the Ulster Way. The southern reservoir is also clearly used by the public for informal recreation. The features listed in the Plan, justifying the LLPA designation include “areas of local amenity importance” and makes specific reference to Clandeboye Golf Course, of which the site is/was a part. In fact, we observed the site being used for golf practice at the time of our visit. We consider the site to have significant amenity value and agree with the Department that it is a vital element in terms of connectivity between the reservoirs, both physically and visually. The Department considered that the connectivity issue might be addressed by a KSR attached to a housing zoning. We have concerns with this analysis, since development on the site would, realistically, largely sever the two reservoirs. In any event, in the absence of a housing zoning, there would be no justification to exclude any of the site from the LLPA. The absence of trees on much of the site does not reduce its amenity value or render it inappropriate to include it within the designation. We do not accept the objector’s argument that the parts of the site lacking trees should be excluded from the LLPA designation.

The objector’s offer to provide affordable housing on the site does not outweigh our conclusions. We recommend no change to the Plan as a result of the objection.

**Objection 3751**

This objection sought the inclusion of the site within the settlement limit, its removal from Rural Landscape Wedge ND 07 and its designation as a Development Opportunity Site, mainly for housing. The site lies along the western side of Main Street, Conlig. It comprises grassed agricultural land with areas covered in mature trees and other vegetation. The land slopes upwards from the roadside to the west. The roadside boundary is defined by a line of mature trees, as are the southern and western boundaries. The northern boundary comprises a line of mature hedge, separating it from the residential estate beyond.

Our conclusions on the designation of DOSs are set out in Part 1 of our report. The purpose of designating a DOS is to assist in urban regeneration and it would be inappropriate to identify a DOS at this location when what is being sought is, essentially, a housing zoning on agricultural land. The site is sloping in nature and development on it would appear prominent and exposed when the frontage vegetation was removed to facilitate access. The use of the land for development would result in an extension to Bangor in a southerly direction, resulting in urban sprawl and reducing the extent of the rural landscape wedge between Bangor and Newtownards. The proposed settlement development limit in the draft Plan provides a legible and defensible limit of...
development for Bangor. We do not consider the site suitable for inclusion for housing. It should remain within the rural landscape wedge. We recommend no change to the Plan as a result of the objection.

**Objection 2574**

This objection related to land at Main Street, Conlig, on the opposite side of the road from objection site 3571. The objector sought removal of the site from the RLW ND 07 and zoning for housing. The site is a large, wedge shaped area that encompasses the agricultural land between the residential development at Laurel Park and Vermont Avenue and the junction of Main Street and Newtownards Road. The site gently rises upwards from the Newtownards Road towards Main Street, affording open views into much of the site from the Newtownards Road approach. There are several dwellings, including one under construction, within the site fronting onto Main Street, with a farm complex situated within the middle of the land. The Main Street frontage is defined by a mix of stone wall, fencing and hedge. The eastern boundary is defined by a wooden fence, whilst the northern is defined by a low hedge.

Although the site is afforded a strong boundary by the Main Street roadway meeting the Newtownards Road, housing thereon would appear prominent, given the elevated nature of the landform and the open views from the main route along Newtownards Road. The site would result in urban sprawl along the Newtownards Road and reduce the visual and physical gap between Bangor and Newtownards.

The status of the site in a previous development plan has no bearing on our consideration of the proposed SDL for this Plan. We consider that the site should remain within the RLW and should not be zoned for housing. We recommend no change to the Plan as a result of the objection.

**Objection 688**

This objection sought the inclusion of a portion of land within the settlement development limit to be used for “development purposes”. The site comprises grassed agricultural land that is relatively flat and lies slightly below the level of the Newtownards Road. Objection site 2574 lies across the road, to the west. A small watercourse runs longitudinally through the site. The roadside boundary is defined by a low wooden fence with a line of semi-mature trees and mature hedge to its rear. A laneway, the Drumhirk Way, runs along the southern site boundary, which is defined by a post and wire fence. A mature hedgeline runs along the eastern boundary, whilst the northern side is defined by a fence and has mature hedge along part of it. The site lies within the proposed RLW ND 07.

Whilst the site possesses similar topography to that of employment / industry zoning BR 06, inclusion of the objection lands would result in a significant reduction in the landscape wedge between Bangor and Newtownards and an inappropriate extension of Bangor in a southerly direction, resulting in urban sprawl. Although the Drumhirk Way laneway would provide a defined limit to development, the proposed boundary of BR 06 is adequate for this purpose. We see no purpose in the inclusion of the lands for an unspecified purpose in any case. Irrespective of the availability of services to the site we
are not persuaded of the need to include this site for any form of development. We agree with the counter objector that the site should remain outside the settlement development limit and we recommend no change to the Plan as a result of the objection.

**Land at Newtownards Road - seeking an extension to Employment Zoning BR 06**  
(Objection 1920/14)

This objection from NDBC sought the inclusion of additional land within zoning BR 06. It was argued that the existing zoning is too restricted and should be enlarged to accommodate expected economic growth.

The Council argued that as BR 06 is the only proposal for additional employment/industrial zoning in Bangor, the overall size of the proposed zoning (i.e. 17 ha of land) is too restricted. The Council argued that, due to the physical attributes of the BR 06 zoning, the overall effectiveness of the site will be hampered by the need to provide adequate infrastructure and an 8-10 metre landscape buffer where the zoning abuts the countryside. By enlarging the site its overall effectiveness would be greatly enhanced. The Department considered that there could be merit in including the objection site within the SDL as an extended part of BR 06, as it is clearly related to this zoning.

The site includes agricultural land and land in poor condition that appears to have been part of a landfill operation. The site extends along the eastern side of Drumhirk Way, a concreted lane running off the Newtownards Road. We do not consider that development of the site for employment uses would have an unacceptable visual impact or would lead to an illogical extension of the urban area. It would not extend further east than the adjacent housing zoning BR 04/04 or further south than the existing BR 06 employment zoning. It would not have a major impact on the setting of Bangor.

The Department has relied, inter alia, on the advice of District Councils in determining the quantum of employment land that should be zoned in the Plan. Whilst there is no firm evidence that insufficient land has been zoned in Bangor, neither is there firm evidence to the contrary. The view of NDBC, that an extension to zoning BR 06 is necessary, is an important factor in our consideration of this objection. We therefore accept both the objector’s and the Department’s analyses and recommend accordingly.

**Recommendation**

We recommend that the objection site is brought within the SDL and incorporated into Employment zoning BR 06.

**Lands at Green Road**  
(Objections 1459, 2012, 2930, and 3739)

Our strategic conclusions on the supply of housing land in the Plan area are contained in Part 1 of our report. Objection site 1459 includes sites 3739, 2012, and 2930, together with a small area enclosed by the latter two sites and the settlement limit proposed in the draft Plan. As originally submitted, site 1459 extended to 36.64 ha; its
zoning would result in an excessive allocation of housing land and an unacceptable extension of the settlement in a southerly direction. For these reasons we consider it unacceptable.

The Gransha Road/Green Road link is no longer a proposal of Roads Service. Irrespective of the objector’s argument, it is not an option for this Plan to reinstate the scheme. It could, however, be considered as part of a development proposal. We see little strategic benefit to Bangor in the construction of such a link road. We agree with the Department that it is not essential at present. It would largely serve local traffic resulting from additional housing zonings. Its provision would not result in a level of gain that would outweigh our conclusions in respect of objection site 1459, as originally submitted.

The reduced site 1459, of approximately 20Ha, also incorporates sites 2012, 2930 and 3739. It comprises a number of gently undulating fields extending from Green Road to existing housing at Balmoral Road. There are also a number of dwellings within the site. Field boundaries are generally defined by hedges and trees. Where it abuts the development limit, boundaries consist mainly of fencing. Site 3739 is a small parcel of rough, overgrown land to the south of housing zoning BR 03/12, which has been developed. It has been used for informal dumping and there is evidence of bonfires. It has no agricultural use at present. All of the sites are readily accessible from existing residential areas or zoned lands. Objection 3739 sought a DOS on the site. We have stated elsewhere that we do not consider that greenfield land outside the current SDL should be designated as a DOS.

We consider that the condition of site 3739 differentiates it from the agricultural land in the remainder of site 1459. Whilst its southern and western boundaries lack any strong definition, this could be remedied by planting. Its inclusion within the urban limit would represent a logical and minor extension to the settlement. In terms of urban form, the extension would largely mirror that currently existing. We consider that the site should be zoned for housing. The resultant yield would be around 43 units. Development of the remainder of site 1459 would result in a southerly extension of Bangor that would not be excessive. It would provide a rational settlement limit, utilising existing field boundaries. It would not have any major visual impact relative to Green Road; however it is not required to meet the uplifted HGI. Given the large yield, the site should be held in the STLR and released for housing, if required.

We have already provided our comments on the issue of KSRs. In the case of site 1459, the suggested KSRs referred to provision of a Gransha Road/ Green Road link in connection with development, based on an ‘initial assessment’ by Roads Service. It also refers to the need for a TA to identify necessary infrastructure. In the absence of a TA and definitive evidence that it is needed, we are not convinced that the KSR is justified. Given the size of the sites, it will be for the Department to determine if KSRs requiring an element of social housing are justified.

**Recommendation**

We recommend that site 3739 is zoned for housing. The remaining 18.3 Ha (approx) of site 1459 (including sites 2012 and 2930) should be held in the STLR for housing and released, if required.
**Lands at Gransha Road**

**Objection 3786**

This large site is located to the west of Gransha Road and, as reduced at the Inquiry, extends to around 10 Ha. It comprises a number of fields to the south of existing residential areas. The objection sought the designation of the site as a DOS, mainly residential. The Department considered the reduced site suitable for development.

We do not accept that greenfield land outside the current settlement limit should be zoned as a DOS. We do not accept that the site would result in a modest consolidation of the development limit. Notwithstanding that the farm lane along the southern boundary could provide a reasonably strong development limit, we consider that the site would result in excessive growth in a southerly direction, resulting in an illogical protrusion of the urban footprint both along the western side of Gransha Road and relative to the reduced site 1459, which we have found acceptable. We consider that the site should not be zoned for housing and recommend no change to the Plan as a result of the objection. The appellant’s arguments regarding the sustainability of the site’s location do not outweigh our conclusions.

**Objection 3785**

Objection 3785 sought inclusion of the site within the settlement limit and its identification as a DOS, mainly for housing. We have already set out our view on the criteria for identification of DOSs; it would be inappropriate to identify a DOS on virgin agricultural land currently outside the settlement limit. It is clear that what is actually being sought is a housing zoning.

At the Inquiry the site was reduced to a 6.4 Hectare area of land to the south of the ‘Chatsworth’ housing development, off Gransha Road. The Department considered the site suitable for development. The subject land is not prominent and housing development thereon would have no more significant visual impact than the existing housing to the north. The new urban limit would be defined by the hedges along the boundary of the field in the western part of the reduced site and by landscaped planting in the eastern portion of the lands. This latter part of the site is not visually prominent and we do not consider the current lack of definition to the site to be critical. If this site is developed it would result in a minor encroachment into the countryside with no significant impact on the setting of the town; a compact urban form would result. There are no indications that impediments to development exist. Given the potential yield of the site, at around 160 units, the HGI for North Down would be exceeded if the site were to be zoned for release on Plan adoption. The site should therefore be held in the STLR and released in future, if required. Given the size of the site, it will be for the Department to determine if a KSR requiring an element of social housing is justified.

**Recommendation**

We recommend that the objection site is included within the STLR for housing development.
Land at Ballycrochan Road
(Objection 1308)

The site comprises three fields on the eastern side of Ballycrochan Road, opposite housing zonings BR 02/43 and BR 03/16. A large complex of farm buildings lies centrally within the site. The roadside boundaries mainly comprise trees and hedges, which are low in parts. The other boundaries comprise a mix of hedgerows and fencing. The land is relatively level.

Irrespective of the objector’s arguments to the contrary, we consider Ballycrochan Road to be a logical and defensible urban limit at this location. Development of the objection lands would result in a protrusion of the settlement into open countryside and we do not accept that it would result in an improved urban form. The eastern boundaries of the site are not defined by features that would result in a strong limit to the town. We accept that wise use of existing infrastructure is desirable, but not at the expense of urban sprawl.

It is common for farmland to abut urban limits and we recognise that this can have an impact on the use of agricultural property; problems can arise not just where farmland abuts a road, but also where it adjoins private gardens. We do not therefore accept the objector’s arguments in this respect. We are not convinced that removal of the farm complex would result in planning gain since it is an innocuous element in the landscape. Retirement of the landowner is not a matter that outweighs our conclusions. We consider that the objection lands should remain within the countryside and recommend no change to the Plan as a result of the objection.

Land at Donaghadee Road
(Objections 803 and 1935)

Reduced objection site 803 comprises three large fields in arable use on the southern side of Donaghadee Road. Roadside boundaries are defined by good hedges. The land abuts Ballycrochan Road and existing residential areas thereon along its western and southern sides. The land rises steeply from west to east, reaching a high point in the centre field, and then dropping towards the east.

Objection site 1935, as reduced, comprises a number of fields on the northern side of Donaghadee Road. The roadside boundaries comprise of good hedges. The eastern and northern boundaries are defined by a mix of fences and vegetation demarcating the curtilages of adjacent residential development. Remaining boundaries are defined by hedges and trees on farmland. The site is undulating and similar in topography to the housing estates to the west and north. The fields abutting Donaghadee Road exhibit similar characteristics to objection site 803, rising to a high point close to the complex known as Hawe Farm. The Department considered that both sites would be suitable for development.

Objection 1935 referred to the proposed AOCMD. Our recommendations on such designations are set out in Part 1 of our report, as are our conclusions on the housing land allocation for metropolitan North Down. We do not accept that either site would represent rounding off or consolidation of the settlement limit. The impression on Plan map 3a, that site 803 would be somewhat ‘enclosed’ by existing development, is not evident on the ground. We agree with the counter objectors that development of the
sites would result in significant eastwards growth of Bangor. We note that Towerview school has been rebuilt without a contribution from development on site 1935.

We consider that important critical views of both sites exist when travelling eastwards from central Bangor on the main Donaghadee Road. The lower parts of site 1935 are not visible and development thereon would not be visually intrusive. However, the eastern parts of the site, around the farm complex are elevated and dwellings erected on this part of the land would be visually intrusive in the landscape. Development on the western field in site 803 would have an even greater impact and would dominate the locality. Whilst housing on other parts of both sites would be less prominent relative to Donaghadee Road, we consider that development of the aforementioned elevated portions of the lands would be unacceptable, fatal to the entirety of both objections, and would have a detrimental impact on the setting of Bangor at this location. Site 803 is also particularly visible from Ballycrochan Road and housing thereon would be seen as unacceptably prominent relative to that location. The objector’s offer to provide an element of social housing would not outweigh our conclusions. Neither do the arguments that the proposal will result in planning gain. Contrary to the Department’s position, we recommend that the sites remain within the countryside and we recommend no change to the Plan as a result of either objection.

**Land at Groomsport Road**
(Objections 3554 and 3754)

Both objections related to broadly the same area of land, seeking its inclusion within the Bangor settlement development limit and its removal from the Rural Landscape Wedge (ND 06). Only objection 3554 contained a reference to housing. Objection 3754 sought exclusion of the site from the AOCMD. Our conclusions on such designations are set out in Part 1 of our report.

The site comprises a large area of land on the north-eastern periphery of Bangor. Within it lies No. 35 Ballymacormick Road, a two storey dwelling and farm complex, a number of agricultural fields and the playing fields belonging to Bangor Grammar School. The northern boundary runs along the Groomsport Road, the southern along the Ballymacormick Road and the western edge of the site abuts the Groomsport roundabout. The northern boundary is defined by a mature hedge, as is the eastern boundary. The southern boundary comprises wire fencing in part and a low concrete wall along the section fronting No. 35. The land itself undulates throughout, rising to its highest around No. 35 and the cluster of buildings with it. The eastern section containing the playing fields is more level in nature. Objection 3754 included a section of the Groomsport roundabout itself.

Development on the site would appear prominent in the northern and eastern sections of the site given their sloping and elevated nature from critical views on the Groomsport Road and Ballymacormick Road. The inclusion of the land within the Bangor settlement development limit and its removal from Rural Landscape Wedge ND 06 would contribute to the coalescence of Bangor and Groomsport, which lies a short distance beyond the site to the north-east. The Ballymacormick Road and the Groomsport roundabout provide a strongly defined, effective boundary to Bangor. We consider that this land should remain outside the settlement development limit and within the rural
landscape wedge in order to maintain the distinction between Bangor and Groomsport, and avoid development on visually intrusive land.

In respect of both objections we recommend no change to the Plan.

OBJECTIONS TO HOUSING ZONINGS

General
(Objection 1261/5)

The objector stated that the scale of housing development proposed on the south-east side of Bangor would necessitate improved transport and sewerage infrastructure, as well as stating that the Bangor to Newtownards corridor is already heavily developed. The Plan contains several large proposed housing zonings in this area but in zoning this land it would be dependent on there being the capacity to provide the infrastructure necessary to accommodate the new development. Applications for housing on these sites would require a transport assessment depending on their size, which would allow the Department to assess the potential traffic impacts of the scheme on the wider road network. There was no evidence to suggest that any necessary improvements could not be made, if required, nor was there evidence that sewerage infrastructure would be unable to accommodate new development. We consider that there is no need for the Plan to require such improved infrastructure in itself and recommend no change to the Plan.

BR 03/05 – Bloomfield Road (Seeking redesignation as a DOS)
(Objection 3808)

The objection related to housing zoning BR 03/05 and the adjacent unzoned land to the north of that zoning. The site lies at the junction of the Bloomfield Road and the roundabout, comprising the plots of what was a row of detached dwellings, all since demolished. Internal boundaries between the plots have been removed and only traces of the tarmac driveways and plot accesses are evident. The site is largely overgrown in weeds and bushes, with some small heaps of spoil. The frontage along Bloomfield Road is defined by a stone wall, whilst the southern boundary is defined by a low wall and line of conifers. The northern boundary comprises a line of hedge with several mature trees with a small river beyond. The western boundary abuts the rear of the Lismore Avenue residential estate and comprises mature hedge.

0.33 ha of the objection site is zoned under proposal BR 03/05. This portion had an outline approval for 16 apartments on it during the preparation of the Plan. It is logical that in that context the site should have been zoned as a committed housing site.

Our conclusions on the designation of DOSs are set out in Part 1 of our report. We note that the objector has not suggested a proposed land use for the suggested DOS. In the case of this site we do not consider that the site is strategically located or that its designation as a DOS would meet any of the other important Plan objectives. The site is within the SDL and the fact that a portion is unzoned would not prohibit its development for a largely residential scheme, subject to satisfying prevailing regional policy. The
objecor provided no specific arguments in support of the case that would enable our further consideration of this matter. We recommend no change to the Plan.

**BR 04/02 – Clifton Road**  
*(Objection1261/11)*

The objection related to the key site requirements for housing zoning BR 04/02 at Clifton Road. The objector stated that the minimum density requirement of 10 units per hectare would result in development that would change the character of the area as well as increase traffic and sewage issues. We consider that a minimum density requirement for this zoning per se would be in line with the thrust within the Regional Development Strategy for the efficient use of land for housing within urban areas. We disagree that such a minimum density requirement would result in a development that was out of character with the existing development around it. There would be opportunity through the development management process to comment on proposed development that was considered out of character. Impacts from traffic and sewage are material considerations that would also be assessed during the processing of any planning application. We note that the site has an existing planning approval for 34 units on the site, well in excess of the minimum density requirement. We recommend no change to the Plan as a result of the objection.

**BR 04/04 – South of Green Road**  
*(Objections 877/1, 888/1, and 2001/1)*

These objections related to a number of the KSRs for the zoning BR 04/04, which is located on the south side of Green Road. As all of this zoning already has the benefit of planning permission for residential development and construction is substantially complete, we do not need to consider this objection any further. We recommend no change to the Plan.

**BR 04/05 – Rathgael Road**  
*(Objection 1261/12)*

This objection stated that there was an incompatibility between proposed housing zonings and proposed Sites of Local Nature Conservation Importance (SLNCIs). Housing zoning BR04/05 on the Rathgael Road was referred to specifically. This zoning comprises lands at the Rathgael Training Centre. The land is relatively flat with a number of vacant institutional buildings on it, in varying degrees of disrepair. Adjacent to the north of the proposed zoning lies a large pond, scrubland and groups of trees of various species. This area is designated in the Plan as SLNCI BR17/04. The Technical Supplement describes it as being a valuable wildlife refuge.

Whilst no specific arguments were put forward to support the objection, we consider that there is no inherent incompatibility between housing and SLNCI designations in general, or in the specific case of Rathgael, even with close proximity to one another. Any planning application for housing on a zoned site would be assessed through the development management process which would have regard for the potential impacts on an adjacent designated area. Were there to be demonstrably harmful impacts on the
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SLNCI the application could be refused on that basis. We recommend no change to the Plan as a result of the objection.

**BR 05/04 – Belfast Road**
(Objection 2788/2)

The objection referred to the relative unsuitability of the zoning for housing, given the need for road improvements to allow access. No explanation was forthcoming in support of the assertion that would allow us to consider the matter further. We recommend no change to the Plan.

**BR 05/09 – Clifton Road/College Avenue**
(Objections 701/1 & 1920/3)

Objection 701/1 stated that, given the differing types of housing surrounding the site there should be two different density requirements in the KSRs, as well as a maximum density imposed of 25 dwellings per hectare (dph) on one part and 20 – 30 dph on the other. Objection 1920/3, from NDBC, was to the density figure cited in the KSRs in the Plan. The Council also considered this figure to be inappropriate, given the site’s context.

PPS12 requires minimum density figures to be applied in respect of housing sites within the urban footprint. This site is in a sustainable location close to the town centre, public transport facilities, and local amenities. It differs from its immediate surroundings in that it contains a number of substantial school buildings. Regional policy requires density to respect its context and in this instance the site is located within a proposed ATC. We do not consider there to be a conflict between maximising the site’s potential to provide new housing, whilst achieving a layout and design appropriate to the proposed ATC. These latter matters can be dealt with at the development management stage and should be informed by a careful analysis of the character of the locality. There is thus no need for a maximum density to be stipulated. We do not agree with the Department’s stance at the Inquiry that there is no need for a KSR in respect of minimum density; we consider that the density stipulated in the Plan is reasonable. We do not consider that variations in the stated density across the site would be ruled out if it were justified in design terms.

The Council also argued that the KSRs should be expanded upon to set out a clear vision as to how any proposed housing scheme on this site should be sympathetic to the character of the local townscape. We note that this particular issue was not raised in the original objection. In any event, regional policy addresses the matter. We recommend no change to the Plan as a result of the objections.

**BR 05/11 – Ballykillaire, Old Belfast Road**
(Objections 1920/2 & 2788/3)

NDBC sought the deletion of this zoning from the Plan. It was argued that the construction of the new school has landlocked the site and that it should be re-designated to either ‘An Area of Existing Open Space’ or as ‘Existing Civic/Sporting
Uses’. This would allow the Council to develop the land either as an extension to the adjoining Clandeboye Cemetery or Bangor Sportsplex. Objection 2788/3 referred to the relative unsuitability of the zoning for housing, given the need for road improvements to allow access; the objector suggested that development on the zoning may not be achievable and that the housing allocation to the site should be utilised on land to the north at Ballywooley Lane.

We note that the zoning makes provision for access to Old Belfast Road, where there is existing housing. We cannot discern any policy or guidance that necessitates new housing to be visually or physically connected or related to other residential areas. We have concluded that there is a small shortfall in the housing allocation for the Metropolitan Urban Area in North Down and do not agree with the Council’s argument that the site is not needed to accommodate housing growth in Bangor. However, the Council also argued that, even if there was a need, it would be inappropriate to allow housing development on the site and we shall therefore consider this element of the objection.

In our opinion, the small part of the zoning fronting onto Old Belfast Road would be physically capable of accommodating new housing and relates well to other residential development in the vicinity. It would not lend itself readily to an extension to the Clandeboye Cemetery or the Bangor Sportsplex. We do not consider that the housing zoning should be deleted in respect of this area.

The ‘central’ part of the zoning is a triangular shaped area of land to the east of the cemetery, immediately to the west of Bangor Sportsplex. Much of the site is overgrown with mature trees, shrubs and bushes although there is an area in grass to the north of the new Clifton School complex. There are two direct linkages to the cemetery with connecting roadways. The northern part of the zoning, to the north of the cemetery, comprises agricultural land, which rises markedly from east to west. The western boundary is undefined.

In our opinion, the development limit is somewhat contrived at this location and does not follow existing field boundaries or topography. However, we note that it reflects the limit adopted in the NDAAP, in which the objection site was identified as housing land and a site for a new secondary school. We do not accept that the topography of the site or the marshy nature of some of the land would preclude housing development or result in difficulties in its conformity with relevant policy and guidance. We do not accept that housing would be at odds with the character of the area or the adjacent cemetery, educational, or recreational uses. The site may be suitable for other types of development, but this, in itself, does not justify deletion of the housing zoning. Whilst the Council argued that the site is needed as burial space, there is no convincing evidence that an extension of the cemetery to the north or west, into other land outside the proposed settlement limit, is entirely infeasible. Access to such land would be possible from the existing cemetery and such a land use would be acceptable, in principle, in the rural area. We agree with the Department that any proposal could be assessed through the development management process. We note that an extension to the west of the cemetery has already been approved by the Department.

We accept that an extension of the Sportsplex may be constrained by surrounding development. We cannot consider objections to the Technical Supplement, which is not part of the Plan. However, we acknowledge the Council’s argument that there is a deficit
of public playing fields and children’s play space in Bangor West. We note that the Council’s evidence states that the adjacent playing fields provide excellent recreational facilities which meet the needs of this particular part of Bangor and that no specific need for additional open space has been identified. The existing open space and recreational facility at the Sportsplex is extensive and includes a large equipped playground, athletics facilities and football pitches. Whilst there may be an undisputed general need for additional facilities, there is no compelling evidence that this part of the extensive Bangor West area is deficient in open or recreational space. Given the evidence put forward by the Council, we have difficulty with its ambivalent position that the site could be used to address either the alleged need for additional burial space or the alleged need for further sporting facilities. We are not convinced that the Council’s proposals outweigh the need to retain an adequate quantum of housing land to meet the HGI, whilst avoiding the need for inclusion of additional Greenfield sites, where possible. The need for a rural landscaping buffer in conjunction with the housing is not an unduly onerous requirement factor that weighs against the provision of the residential development. Use of land for open space will always be less visually intrusive than housing but this also cannot justify deletion of this zoning. We do not consider that a housing zoning within the SDL should be deleted at the expense of land uses that can be accommodated in the countryside, particularly as this would result in the need to incorporate rural lands within the SDL for housing development elsewhere in North Down. We do not accept the argument put forward in objection 2788/3 that development on the zoning is not likely to be achievable.

Reference by the Council to the site’s use for education facilities is outwith the scope of the original objection and thus cannot be considered.

We recommend no change to the Plan as a result of the objection.

**BR 05/13 – North of Green Road**
(Objections 869/1 & 2096/1)

These objections relate to a number of the KSRs listed under housing zoning BR 05/13 located to the north of Green Road. Since the Draft BMAP was published, a Concept Master Plan (CMP) for the development of both zoning BR 05/13 and zoning BR 04/04 was received by the Department in May 2006. The Department in its letter to the interested parties in June 2007 stated that it required that all planning applications for development on each zoning should be in conformity with the CMP. This letter appears to demonstrate that the Department had accepted both the analysis undertaken during the master planning process and the indicative layout for the comprehensive development within the zonings. While development within zoning BR 04/04 is substantially complete, only part of the zoning BR 05/13 benefits from planning permission. Given that development can proceed under the conditions attached to the extant approvals it would be unreasonable and inappropriate to attach KSRs or other requirements to those parts of the site which benefit from permission. However, it would appear that the southwest corner and the northern part of the site have not yet had the benefit of planning permission and KSRs would be applicable to those parts of the site.

The CMP indicated within zoning BR 05/13 a site of 1.4ha adjacent to Green Road for a primary school. The CMP stated that an agreement had been reached with the South Eastern Education and Library Board (SEELB) on the size and location of the site.
Based on the site visit, though development has commenced on the zoning, an area of land adjacent to Green Road has not been developed and appears to be set aside as per the CMP. As the SEELB is best placed to determine the space requirements for a new school, the KSR should be amended from 2ha to 1.4ha to take cognisance of the agreement.

The CMP did not indicate a local neighbourhood centre within either zoning. The accompanying analysis concluded that another local centre was unnecessary given the close proximity of an existing local centre approximately 500m to the west on the south side of Green Road. This neighbourhood centre includes a small supermarket, a pharmacy and a medical centre. The CMP indicated the erection of a new community facility to replace a community hall within the Breezemount development stating that a financial contribution would be made from the developers within the CMP. This community hall is now erected close to the local centre. The CMP indicated another existing hall to the north of the zoning on Rathgill Parade which is to be connected by road link into the development on zoning BR 05/13. The CMP indicated the provision of a site for a church in the northern part of the zoning which is now erected. In this evidential context, adequate provision appears to have been made for the necessary local neighbourhood facilities and therefore we recommend that the reference to the KSR for a local neighbourhood centre would be inappropriate.

The ground in the north of the zoning is slightly higher than that part of the zoning along Green Road. However, it is not prominent in views from Green Road or elevated above the housing already developed on the zoning. Therefore, the 50m contour line is not significant in the context of the topography of the area. Furthermore, the height of land is comparable with part of that within the zoning BR 03/09 which was not subject to KSRs and it would appear that the land above the 50m contour line has been developed for 2 storey housing. In this context, a KSR restricting development to single storey above the 50 m contour line on the objection site would be inappropriate.

The objector sought the removal of the KSR for the provision of a bus service linking new and existing housing roads to promote the use of public transport. The proposed connection into Rathgill Parade from the zoning will facilitate linkages between Balloo Road and Green Road. To facilitate adequate and convenient access to public transport within the zoning, the provision of a bus service is a necessary requirement. We are not persuaded that this KSR should be deleted.

**Recommendation**

We recommend that:

- The KSR for a local neighbourhood centre should be deleted;
- The KSR relating to the primary school should be amended to refer to 1.4ha of land.
- The KSR for development above the 50m contour line to be single storey should be deleted.
OBJECTIONS SEEKING ADDITIONAL HOUSING WITHIN THE SDL

**Land at Stricklands Glen (also objection to LLPA BR 29)**
(Objection 1920/13)

North Down Borough Council objected to the inclusion of a piece of land within the Stricklands Glen LLPA BR 29 and sought its zoning for housing. Several submissions, seeking designation of a Conservation Area in Bangor West, objected to the Council’s proposal to dispose of land for development at Connor Park. The site is a rectangular, maintained grassed area that lies adjacent to Kensington Drive, a residential estate. The land is on the periphery of Connor Park recreational ground, but is not identified as existing open space in the Plan. A line of mature trees and hedge runs along the majority of the eastern boundary, save for a section which opens onto Kensington Drive. The northern boundary is defined by a mature hedge belonging to the adjacent detached dwelling, 40 Kensington Drive. The southern boundary is defined by a mature hedge dividing the site from Glen Manor, a large detached dwelling. A cluster of semi mature trees straddles the undefined western boundary. The land sits slightly below the level of Kensington Drive and is relatively flat.

Whilst dwellings could be designed to respect the adjacent proposed ATC and avoid adversely affecting the features of the LLPA, the objection site serves as a physical and visual linkage between the LLPA and built development in Kensington Drive. The site allows passage and views from the residential development into Connor Park and Stricklands Glen beyond that to the west. It provides a sense of green space within an otherwise extensively developed area. We consider that this area has important value as an amenity space, should be retained within the LLPA, and should not be zoned for housing. The Council’s objection is inconsistent with its position in respect of housing zoning BR 05/11 where it argued that there is a lack of open space in Bangor West. We recommend no change to the Plan as a result of the Council’s objection.

**Land at Seacourt, also to ATC designation BR 15**
(Objection 3539)

This site is located between Seacourt and Seacourt Garden, off Maxwell Drive. It comprises an area of rough ground that was clearly once part of the garden of the adjacent large period dwelling known as Seacourt. The site contains a considerable number of mature trees and boundaries are partially defined by walls. There are a number of recently constructed residential properties surrounding the site. The objection sought zoning of the site for housing and its exclusion from the proposed Bangor West ATC, BR 15. The objector stated that the lands have a planning history and various approvals for residential development. The objection also referred to the housing allocation for the draft Plan Area; this matter has been addressed in Part 1 of our report.

The site has a mature character and the trees therein are important features in the local landscape. It lies immediately adjacent to an historic building, which is also a notable feature in the area. We consider the site and its surroundings to be an example of the type of townscape that justifies designation BR15 in Bangor West. Even if it were not, removal of the site from the ATC would leave an illogical gap in the designation. We consider that the site should remain part of the ATC.
Our conclusion on the strategic housing issue was that there is a small shortfall in the allocation to North Down in terms of meeting the uplifted HGI. Bangor is the main town in the District and there is little scope for expansion in Holywood, the villages, and small settlements. In principle, we do not accept the argument in NDBC’s counter objection that no more housing land should be zoned in Bangor. We have not been presented with any details in respect of the planning approvals to which the objector referred. If there is approval for residential development, we see little point in zoning the site for housing. The counter objector stated that the approvals related to land adjacent to the objection site and that there had been two applications on the subject site for housing; one withdrawn and the other refused on grounds of loss of trees and impact on the setting of the listed building.

The site does not appear to have any current formal land use. It has to an extent been severed from the adjacent historic property by a new hammerhead and an access. Notwithstanding this, it is uncertain whether or not the site could accommodate residential development without adversely affecting the listed building or its setting, or resulting in the loss of trees, which are important in landscape terms. Given this, it would not be appropriate to zone the site for housing. We recommend no change to the Plan as a result of the objection.

**Land at Bangor Golf Club**
(Objection 3150)

This objection sought the designation of land, currently identified as open space in the Plan, as a Development Opportunity Site (DOS) for housing. The site comprises the Bangor Golf Course to the north of the East Circular Road. The western boundary runs along Broadway and Fairfield Road. Housing developments abut the northern and eastern sides of the site. The land, whilst generally flat, has slight undulations. The site boundaries are defined by mature hedge and semi-mature trees of a mix of deciduous and conifer species.

We do not consider that land currently in recreational use can be described as vacant or underutilised land and the objection site should not thus be designated as a DOS. Essentially, the objection seeks a housing zoning. The golf course is an important area of green space within a densely built up urban area. It is in active use and is clearly an important recreational asset. Whilst there is a need to provide housing land, this should not be achieved at the expense of recreational facilities unless they are demonstrably unnecessary. The objector provided no specific arguments in support of the case that would enable further consideration of the matter. The site in its present use as a golf course clearly falls under the typology of open space as set out in Annex A2 of Planning Policy Statement 8 – Open Space, Sport and Recreation. In view of this we consider that its identification as open space in the Plan is logical. We recommend no change to the Plan as a result of the objection.

**Bangor F.C. Grounds, Clandeboye Road**
(Objections 3167 and 1920/11)

Objection 3167 sought the rezoning of an area of open space to a DOS. The original objection did not specify a suggested land use; however, use of the site for residential
development was subsequently referred to. Objection 1920/11 sought the site to be left as whiteland in the Plan, in order to allow North Down Borough Council the option of disposing of the site in the future and allocating various dispersed sports pitches to a central location.

We do not consider that an active recreational facility such as this can be described as vacant or underutilised land in the context of designation of a DOS, which seeks to achieve urban regeneration. As already stated, whilst there is a need to provide housing land, this should not be achieved at the expense of recreational facilities unless they are demonstrably unnecessary. We have not been presented with any tangible proposal for the relocation of these sports facilities. Although the location of the site within an urban residential area may at times generate noise and crowds, it is not unusual for sports venues in urban areas to be located adjacent or in close proximity to residential areas. We are not persuaded that the attraction of large crowds to the site or a deficit in car parking would in itself justify the zoning of the land for housing. The site is located on a road with a bus service and it does not follow that every one who visits the site would travel by car, necessitating larger parking provision. The unattractive appearance of the security fencing would not justify the development of the site for an alternative use. Whilst the sporting activity on the site has the potential to give rise to amenity issues with the adjacent housing, the grounds are longstanding and have had this relationship with the surrounding development for some time. We are not persuaded that the site is unsuitable for its existing use. Whilst we consider that, in principle, the land would be suitable for housing development, the circumstances of this case do not justify its zoning for such in the Plan.

With regard to NDBC’s objection, we have not been provided with any details of the proposals to consolidate open space provision in Bangor. The subject land is clearly used for recreational purposes and it would be inconsistent, and at odds with the recommendations in Part 1 of our report, for it not to be identified as existing open space in the Plan. We therefore disagree with North Down Borough Council’s argument that the site should be left as ‘white land’ to facilitate its future option of disposing of the land.

In respect of both objections we agree with the Department and counter-objector that the open space identification should remain and recommend no change to the Plan as a result of the objections.

_Bangor Rugby Football and Cricket Club Grounds_  
(Objection 3729)

The site comprises the grounds of Bangor Rugby Football and Cricket Club at Upritchard Park on Bloomfield Road South. The lands are in good condition and appear to be in current use for recreational purposes. The site also contains a clubhouse. The surrounding areas are either zoned for housing or currently in residential use.

The objection sought zoning of the majority of the site for housing with around 2 acres retained as public open space; it was submitted that this would represent planning gain since the existing grounds are private. The objector acknowledged that the sporting facility is important but that its operation is restricted by the surrounding residential property and an alternative location is needed; however, none had been identified. The
Department indicated that a sympathetic approach would have been taken to the zoning if a tangible relocation proposal existed; we would anticipate that this would also apply in respect of any future planning application. We do not accept the objector’s submission that a housing zoning requires to be in place prior to the search for alternative grounds.

The purpose of a development plan is to provide a degree of certainty for the future. Should an acceptable relocation proposal fail to come forward in the Plan period, this zoning would be sterilised by the objector’s suggested KSR. This is an unacceptable proposition, given the obligation on the Department to ensure the provision of an adequate supply of housing land, where plan zonings will be counted against the housing land allocation for the district. We cannot accept the imposition of the suggested KSR, prohibiting the land use to which the zoning relates.

We accept the objector’s argument that unique circumstances would not result in a precedent being set. We accept that the Club may be somewhat constrained in its activities by surrounding housing. However, this is not an unusual situation since sports grounds within urban areas are commonplace. The lands clearly represent an important recreational facility. Whilst there is a recognised need for some additional housing in North Down, we do not consider that this should be provided at the expense of such facilities, unless it is demonstrably appropriate. Sports grounds should not be zoned for an alternative use without clear justification. We do not consider that such exists in this case. The offer of 2 acres of publicly accessible open space, whilst desirable, does not outweigh our conclusions. Since the grounds clearly fall within the definition of open space it is entirely logical for them to be identified as such in the Plan.

We recommend no change to the Plan as a result of the objection.

Land adjacent to Balloo Industrial Estate
(Objection 3825/46)

The objection from Northern Ireland Housing Executive related to the proposed open space zoning BR 33 on lands adjacent to Balloo Industrial Estate. The site comprises a relatively flat grass covered area measuring approximately 3.65 ha. The boundaries are defined by mature hedge and some trees at various points. The site is abutted to the north and west by the Balloo Industrial estate and to the east and south by housing developments. The objection sought zoning of the site partially for open space and partially for housing. NIHE’s primary role is as a provider of social housing, a shortage of which has been identified in Bangor. We therefore interpret the reference to housing in the objection as a reference to social housing.

We consider the site to be well located and physically suitable for housing. Given the shortfall in public open space within North Down we also consider it important that proposed open space be retained to serve the local area. We note the response from North Down Borough Council, the body with statutory responsibility for provision of open space, that it has reached agreement with Invest Northern Ireland and the objector on the extent of open space provision required at this location. The Department accepted in its rebuttal evidence that it considers there to be merit in reviewing BR33, but could not provide a revised boundary. In light of this we consider that the Department should
review the boundaries of BR33 on the basis of the outcome of these discussions and should zone part of the land for social housing and retain the remainder for open space.

**Recommendation**

We recommend that the Department reviews the extent of the open space zoning BR33 in consultation with North Down Borough Council and that the remainder of the site be zoned for social housing.

**Land at South Circular Road**  
(Objection 3825/4)

This objection from NIHE sought zoning of the site for social housing, as it is identified on the DSD's Social New Build Programme for a supported housing scheme. Whilst a map of part of the general area was provided, it did not show the boundaries of the site. The land in question lies to the south of the South Circular Road and west of Skipperstone Avenue and Drive. To the west of the land lies Balloo Industrial Estate. The land is not used for any purpose, being largely overgrown. The topography is slightly undulating.

The land is unzoned in the Plan. We acknowledge that there is a deficit in the amount of land for social housing in Bangor. The site lies adjacent to existing social housing and although vegetated, serves little amenity or nature conservation purpose. The site lies within the urban footprint of Bangor and would be a sustainable location for social housing. We consider that this general area could be zoned for social housing.

**Recommendation**

We recommend that the Department, in consultation with NIHE in respect of the extent of the site, zones the land for social housing.

**Land at Clandeboye Road**  
(Objection 3825/29)

NIHE objected to the zoning of land at Clandeboye Road as open space. It stated that the land was identified for a DSD Social New Build Programme for 20 housing units. No further information on the status of this project was provided. The site is a large piece of land situated to the rear of and enclosed by several housing developments. It is informally used as a playing field. The land is in grass and whilst flat in part has a gentle rise running to the eastern end as well as to the westernmost point. Access to the site can be achieved through several of the housing developments adjacent.

Whilst there is a need for additional social housing in Bangor and the site itself is located within the urban footprint, the land provides an area of open space for local residents. The site is surrounded by housing developments, some of which are relatively high density and have minimal open space provision. These developments have relatively easy access to the land. The need for social housing in this location is outweighed by the value of this land as recreational open space and we consider that
the site should be retained and identified for this purpose. We recommend no change to the Plan.

**OBJECTIONS SEEKING DEVELOPMENT OPPORTUNITY SITE ZONINGS**

**Land at Dellmount Avenue**  
(Objection 3229/1)

This objection sought the designation of land at Dellmount Avenue as a DOS for residential use. The site comprises a large vacant two storey dwelling, outbuildings and curtilage, a builder’s yard and the housing development of Dellmount Crescent. The builder’s yard contains a large main storage shed and an older, smaller administrative building and storage shed. The site sits opposite a row of dwellings on Dellmount Avenue. There is a two storey dwelling adjacent and north of the site. To the east there is a strip of overgrown undeveloped land, which is zoned in the Plan for housing (BR 05/05). The objection site is unzoned in the Plan. Part of the site has already been developed for housing, thus we make no further comment in respect of that portion.

We do not consider that the site meets the criteria for designation as a DOS, as per the conclusions in Part 1 of our report. However, what the objection essentially seeks is a housing zoning. In its present state, part of the site has a storage and distribution use that is somewhat incompatible with the surrounding residential use. Its use for housing would be an acceptable alternative and would also meet the objective of maximising residential development within the urban footprint. We recommend accordingly.

**Recommendation**

We recommend that the portion of the site not yet developed for housing, be zoned for residential development in the Plan.

**EMPLOYMENT**

**Objections to Employment zoning BR 08**  
(Objection 1920/17)

NDBC argued that there should be greater flexibility in terms of the use classes permissible within the zoning. The Council submitted that a small allowance for financial/professional offices should be made within BR 08. Following on from the conclusions in Part 1 of our report, we consider that Class A2 offices would be inappropriate and should not be included as an acceptable use. This use should remain in town centres and other specified appropriate locations. In respect of this, we have no convincing evidence that provision in Bangor Town Centre is inadequate.

The Council stated that it is attempting to attract knowledge-based industry to the area and that such office use should be permitted within the zoning. The Department confirmed that Class B 1 (b) and (c) uses were acceptable in employment zonings. As the site is zoned as an area of existing employment, no KSRs relating to those uses are necessary. The Council suggested that its concerns could be addressed by Arterial
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Routes office policy. However, we fail to see the relevance of the latter to zoning BR 08, which is not on an Arterial Route. The conclusions in Part 1 of our report indicate that the roads adjacent to BR 08 could not be designated as such. We recommend no change to the Plan as a result of the objection.

RETAILING

DESIGNATION BR 13 – DISTRICT CENTRES

BR 13/01 – Bloomfield
(Objections 1449, 1920/15 & 2760/52)

Two objections sought the inclusion of the same additional lands within the District Centre designation. This comprised an area of retail warehouses adjoining the centre and sharing the same access road and car parking. North Down BC objected to any expansion in the footprint of the centre because of concerns regarding Bangor town centre.

The designated District Centre includes the covered shopping mall (and Tesco store) and the adjoining car park together with a restaurant. The excluded area contains the following stores: Laura Ashley, DW Fitness (includes a Gym), Pets at Home, Laser Electrical, Harry Corry and Reid Furniture. Several of these units were vacant at the time of writing. It is debateable as to whether some of these uses constitute bulky retail.

We concluded in Part 1 of our report that city and town centres were the preferred location for major retail proposals. District Centres have a role to play but that should be a supporting role. We also acknowledged that some District Centres in the BMA contain a level of retailing that extends well beyond meeting a local need. We resisted calls to elevate them in the retail hierarchy and concluded that further development at Abbey Centre, Forestside and Bloomfield should be strictly controlled in order to achieve the strategic objectives of promoting the role of city and town centres.

In this strategic context, we generally conclude that the boundaries of District Centres should be controlled. Their expansion could be justified to include retail units serving a local need but that does not arise in this case. Arguments that the units within the designated centre do not meet the criteria in paragraph 49 of PPS 5 do not justify inclusion of the objection lands which perform a different retail function.

The retail units within the objection sites are mostly retail warehouses. They do not provide convenience retailing or shops whose primary function is to meet a local need. The objection lands are a retail warehouse park in PPS 5 terms; there is no policy support for individual retail warehouses or retail warehouse parks to locate in District Centres. Neither PPS 5 nor our strategic conclusions on retailing in Part 1 of the report favour the inclusion of the objection sites in the District Centre. If they were included, PPS5 would afford them the same protection as existing centres. We were informed that the units are subject to planning conditions restricting the type of retailing in the units. If the objection site was included in the District Centre, the status of floorspace conditions limiting the minimum size of the existing units and the range of goods to be sold could be challenged on the basis that units were now inside the District Centre. We consider that the ramifications of such inclusion could undermine the Plan’s

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objective of promoting the role of city and town centres. We note the particular concerns in relation to the protection and promotion of Bangor town centre that were raised in the retail study and by the Council.

This District Centre is served by public transport and is convenient to large areas of housing. It is therefore in a sustainable location to provide services to this part of Bangor. The fact that the Mall and retail warehouses share a common access and car park means that there is the opportunity for linked trips. The Department accepted this and that the retail warehouses add to the offer available in the District Centre. We do not consider that this is an issue related to room for the centre’s expansion. The centre has been extended several times within the designated area in the Plan. This fact negates the Council’s objection seeking a restriction on the footprint of the designated centre in the Plan.

We must therefore consider the objection in the light of our strategic conclusions and the particular circumstances of this site. The units are physically related to the centre and whilst separate, they appear as an extension to the rear. The physical layout means that they enclose this part of the centre, however, and separate it from the adjoining land. The main access also separates the two portions of the site even though they share some car parking and a common access with the designated centre which links through to the main access onto the ring road. The existence of retail warehousing and offices on the edge of a District Centre is not justification for their inclusion in a centre which has a different retail function in PPS 5 terms. Exclusion of these areas from the District Centre will not alter their retail status in policy terms. We therefore conclude that notwithstanding the factors identified by the objectors seeking the centre’s expansion, the site should remain outside the District Centre and there should be no change to the Plan.

LOCAL CENTRES

Non-designation of 15 Ashbury Avenue, Bangor as a Local Centre
(Objection 3558/7)

The site was designated as a neighbourhood centre in North Down and Ards Area Plan. The centre has recently been re-developed and new units have been provided (planning permission granted in 2008). The Department agreed that the site met the requirements for designation as a Local Centre and requested that the Commission recommend that it was so designated in the Plan. We consider that the site contains sufficient retail floorspace and other complementary uses to warrant its designation as a Local Centre in accordance with the definition in PPS5.

Recommendation

We recommend that the objection site is designated as an additional local centre in the Plan.
Non-identification of sites as DOS and a District Centre / Local Centre
(Objection 3689)

This objection related to two separate sites on Rathgael Road that are several hundred metres apart. We have concluded at the strategic level that sites outside city or town centres would not normally be considered as DOS. Exceptionally, a significant landmark site on a main approach with definite regeneration proposals and benefits may be considered suitable for designation. We do not consider that either site falls into this category because of their location or the fact that no evidence of any regeneration benefits to support the objection was presented. The objection appears to be an attempt to achieve retail use on the sites. The sites are already in use and regional policy will address any future proposals. We were not presented with any evidence of an exceptional case for either site.

The objection sought designation of Site A adjacent to Lord Warden’s Wood as a District or a Local Centre. The site contains a Spar and filling station together with an off-licence and a take-away. At the time of our site visit, it appeared that planning permission had been granted for additional units and construction had just commenced. We have no further information on this matter but can see the size of the vacant land on the objection documents. The scale and range of these retail units does not meet the definition of a District Centre in PPS5 and such a designation is therefore not warranted. We consider that even if extended the scale would not meet the definition of a Local Centre in PPS5 and accordingly would not warrant that designation either. There are several small groups of shops like this in the BMA and indeed in Bangor that do not meet the criteria for designation as Local Centres. The objector did not supply any evidence to support their objection. We recommend no change to the Plan as a result of this objection.

URBAN ENVIRONMENT

Objections to policy UE3 and Key design Criteria in ATCs
(Objections 2523, 2760/54 and 55, 2804, 2854, 3572, 3577 & 3581)

These objections, inter alia, raised concerns with regard to policies UE1, UE 3 and the Key Design Criteria in the Plan. Our conclusions in Part 1 of our report were that Policy UE3 should be deleted, a detailed character analysis undertaken, and a design guide produced for each individual ATC. This latter document should be supplementary guidance to the Plan. In light of this we will not comment on objections to either the key features of the ATCs or the key design criteria proposed. We will therefore only consider objections to the boundaries of the ATCs where the objection has suggested specific changes.

Objection to all Areas of Townscape Character
(Objection 3797)

This objection referred to all ATC designations in North Down District. Whilst the objection stated that none of the proposed ATCs were justified in whole or in part, no specific arguments were presented that would enable our further consideration of the matter. We recommend no change to the Plan as a result of this objection.
Objections to Bangor East ATC – BR14

Objection 1920/18

This objection from NDBC sought the inclusion of a small area of land off Bellevue within the ATC. The site contains a windmill, now converted to a dwelling, together with adjacent cottages.

The Department accepted that the amendment to the ATC boundary would be acceptable. We have no reason to disagree with this position and recommend accordingly.

Recommendation

We recommend that the boundary of the ATC is amended to include the area shown on the attached Plan 1.

Objection 3572/2

This objection was to the ATC generally, as well as to policies UE1 and UE3. We have already dealt with the latter point.

We have considered the information provided by the Department including consultant’s reports and, in the absence of any specific reasoning from the objector, we conclude that the ATC designation is merited. We recommend no change to the Plan in this respect.

Objection 1678/2

This objection related to the inclusion of the Kings Fellowship Church within the ATC. The property lies on the junction of Seacliff Road and Ward Avenue. The building is a two storey flat roofed building of 1960’s design, with a large pitched roof extension to the rear. The site frontage along Seacliff Road is open to the road, with concrete bollards delineating the site boundary with the public road. There is a concrete wall stepping up the eastern boundary along Ward Avenue. There is a terrace of 3 storey buildings adjacent and west of the site. Adjacent and south-west of the site lies the Royal Ulster Yacht Club.

The building itself has little merit in terms of the character and features of the proposed ATC given its design, which is discordant with the surrounding Late Victorian and Edwardian buildings. However, the site itself occupies a prominent roadside location in an otherwise attractive and open part of the ATC. It would be illogical to remove this small portion from within the ATC designation. We recommend no change to the Plan.
Objection 2854/1

This objection sought the removal from the ATC of several three storey Victorian properties along Clifton Road. They are in reasonable physical condition although one is vacant and boarded up. There is a yard area to the eastern end of No. 60. The buildings themselves are representative of the architecture and resultant character of the Seacliff Road, with its Late Victorian and Edwardian buildings with painted stucco walls, natural slate roofs, canted bay windows, robust chimney stacks and vertically proportioned double hung sliding sash windows with views across Bangor Bay and Belfast Lough; for this reason they should be retained in the ATC. In addition, to remove the objection buildings from the designation would be illogical given the gap this would create in the fabric of the ATC. We do not consider it appropriate that the site be removed from the proposed ATC and recommend no change to the Plan.

Objection 3747/1

The objection related to the Bangor East ATC, however, no reasoning or specific arguments were presented that would enable our further consideration of the submission. We recommend no change to the Plan.

Objections seeking designation of Bangor West ATC as a Conservation Area

There were many objections which sought the above. The designation of Conservation Areas is not part of the development plan process and we are therefore unable to deal with the issue. We note the Department’s position that, subject to a review of the boundaries, Bangor West could be added to the list on page 105 of the Strategic volume of the Plan of as an area for future designation as a Conservation Area. Whilst we have no difficulty with that approach, it is a matter for the Department. We make no recommendation on the designation issue, which is ultimately outwith the scope of the Plan.

With regard to the many comments in respect of inappropriate planning proposals in the Bangor West Area, these are matters for the Department and the development management system to address. The ATC designation in the Plan will clearly be material in the consideration of future proposals.

Objections to Bangor West ATC BR 15

Objection 1755

Although the objection was entitled ‘Bangor West ATC, the text referred to the inclusion of No. 5 “Lochglen, Helens Bay, Bangor…..and the whole of Lochglen in the Area of Village Character”. We cannot find a Lochglen within the proposed Helen’s Bay AVC. There is, however, a Lochglen within the proposed Bangor West ATC. We presume it is this designation that the objection relates to.

We would agree with the objector that this modern housing development displays little in the way of the character that would justify its inclusion in an ATC. However, the
proposed ATC includes a substantial area of open space, a LLPA and a SLNCI at Stricklands Glen to the west of Lochglen, to which there were no objections. The exclusion of the latter would leave an illogical gap in the designation and we therefore do not support the objection. The objector has not explained how the designation would be inappropriately restrictive and we thus cannot consider this element of the objection further. Our conclusions on policy UE3 and ATCs are set out in Part 1 of our report. We recommend no change to the Plan.

**Objection 36**

This objection sought deletion of the ATC designation in respect of a small portion of land at Glen Park, as it makes no contribution to the character of the area. The site is on the edge of the designation and its removal would not result in an illogical boundary. The Department agreed with the objector. We have no reason to demur and recommend accordingly.

**Recommendation**

We recommend that the area shown hatched on Plan 2 is excluded from the Bangor West ATC.

**Objection 58**

This objection was to the key features of Kensington Park as identified in the Plan. Our conclusions in Part 1 of our report were that Policy UE3 should be deleted, a detailed character analysis undertaken, and a design guide produced for each individual ATC as supplementary guidance to the Plan. As already stated, therefore, we will not comment on objections to either the key features of the ATCs or the key design criteria proposed. The objection can be addressed by the Department as part of the aforementioned exercise.

**Objection 1134**

This objection argued that the area from the top of Grays Hill to the roundabout at the end of Bryansburn, Brunswick and Maxwell Roads, together with all the Victorian and Edwardian roads and houses in between, should be afforded Conservation Area status. As already stated, the designation of Conservation Areas is outwith the scope of this Plan. The objector also suggested that the area in question should be renamed West Bangor or West Central, since 'Bangor West' refers to an area built largely in the 1960's and later, which lies to the west of the subject area. It was submitted that the term ‘Bangor West’ could diminish the cause for protection of this area.

The area referred to by the objector is within the Bangor West ATC. We see little merit in considering a subdivision of the ATC as part of the current process, given the Department’s statement that it will examine designation boundaries when considering declaration of a Conservation Area. In terms of the name of the designation, we cannot see how this is relevant to the protection of the area; however, this is a matter to which
the Department can give further consideration if it so wishes. We recommend no change to the Plan.

**Objections 2523 and 2804**

These objections sought the exclusion of No.29 Maxwell Road from the proposed ATC. This property is well inside the designation and its exclusion would leave an illogical gap in the ATC. We therefore recommend no change to the Plan as a result of the objections.

**Objections 876/2 and 3369**

This site comprises the building and curtilage of No. 67 Bryansburn Road. The site contains a two storey detached property, currently in use as a veterinary clinic, which was clearly previously a dwelling. The property is bounded by dwellings to the east, west and south.

The site lies within a stretch of Bryansburn Road that is within the Proposed Bangor West ATC. The adjacent properties are not subject to objection and removal of No. 67 would leave an unnatural and illogical gap in the designation. Whilst a general concern has been put forward, the objector has not explained how the proposed designation would adversely affect the veterinary business. We do not consider that the designation would preclude further development on the site, provided that it respected the character of the ATC.

The objector referred to the inclusion of “unattractive housing” in Cedar Mount, to the rear of No.67. We agree that housing in this short street, and indeed in the adjacent Cedar Grove, exhibits little in the way of character that would appear to merit its inclusion in the ATC. Cedar Mount should therefore be removed from the designation. Its exclusion, in isolation, would not result in an illogical boundary to the designation, given its peripheral location. We recommend accordingly.

**Recommendation**

We recommend that Cedar Mount, and the properties therein, be removed from the ATC designation. The extent of the area excluded should be as indicated on the attached Plan 2.

**Objection 3577**

This objection was to the proposed designation of the ATC in the Kensington Park/Kensington Drive area. We were not presented with a plan identifying the area in question, nor was any argument put forward as to why the designation is not justified. We note that these residential areas are well within the boundaries of the proposed designation and their removal would result in a large, illogical gap in the ATC. We recommend no change to the Plan as a result of the objection.
Objection 3581

This objection was to the inclusion of lands at Downshire Road, Bangor within the proposed ATC. No map was submitted, identifying the site that would enable our further consideration of the matter.

Objection 3750

The objection related to the Bangor West ATC, seeking deletion or alteration of the designation. However, no reasoning or specific arguments were presented that would enable our further consideration of the submission. We recommend no change to the Plan.

NATURAL ENVIRONMENT

OBJECTIONS TO SITES OF LOCAL NATURE CONSERVATION IMPORTANCE

BR 17/01 – Carnalea Glen and Slopes (also to LLPA BR 23, identification of the site as existing open space, and inclusion in the BMA Coastal Area)
(Objections 1751/1-3 and 2500)

Objection 1751 related to the grounds of Ballykillaire, Killaire Road. No map was submitted giving a precise boundary for the objection site. Objection 2500 referred to No.2 Killaire Road, presumably the same property. The objection site comprises part of the garden area of the dwelling. It is situated adjacent to, and overlooks, the North Down Coastal Path. The land includes planted areas containing mature trees and more recently planted trees on a lower area sloping down to the Coastal Path. The Department stated that there is an unscheduled archaeological site and monument within the objection site in the form of the remains of a rath, which whilst not visible, has archaeological value. The Department provided information relating to a full planning approval on 25th November 2004 for a new dwelling within the curtilage of No.2. The application site included a large portion of the garden area to the rear of the existing dwelling. Development does not appear to have commenced and the consent will have lapsed if not renewed. We note that a new dwelling has been constructed in the southeast corner of the objection site. We do not know if this was a substitution for the earlier consent, and we have no information as to the planning history of the site subsequent to November 2004.

Objection 1751 stated that the proposed environmental designations were arbitrary, inconsistent, unrelated to the specifics of the area and unnecessary. It was also stated that the designations imposed excessive restrictions on the homeowner’s enjoyment of his property and its potential. This was reiterated in objection 2500.

We note that none of the actual dwellings on Killaire Road have been included within the proposed LLPA, SLNCI or Coastal Area designations, or identified as existing open space. Whilst there are variations in the boundaries of the designations, an attempt seems to have been made to draw the boundaries of the designations to include areas containing trees and significant vegetation.
The Carnalea LLPA lists the unnamed rath as a feature of the LLPA, as well as the North Down Coastal Path as an area of amenity importance. We presume that the rath does not lie within the site of the dwelling approved in 2004. The sloping lands planted in trees within the objection site form part of the setting to the Coastal Path whilst the rath remains also lie within the site. Given the vegetation on the site and that on the adjoining lands, we agree with the Department that the much of the site forms part of a local wildlife corridor which merits inclusion within the SLNCI designation. The inclusion of part of the site within both of these designations is justified and not an arbitrary one. However, if a consent for an additional dwelling exists on the site, we see no reason why it should be included in the designation. We remit the matter to the Department to examine the site’s planning history.

Neither SLNCI nor LLPA designations necessarily prohibit development that is respectful of the features that merited the designations. In this case the designations would still potentially allow the homeowner to carry out appropriate development on his land. Development within the curtilage of a dwelling that does not require planning permission, such as laying out of domestic hard surfaces, and that representing permitted development, is in no way constrained by the designations in question.

The BMA Coastal Area comprises a mix of public and private space along the North Down coastline. The Plan’s policy (COU4) aims to protect the coastal area from inappropriate development; we note that the policy makes reference to ‘nature conservation value’. This implies that areas with nature conservation value at the coast should logically be included in the BMA Coastal Area. With regard to the objection site, and in light of our conclusions in respect of the extent of the SLNCI and LLPA, we consider that the part of the site subject to these designations should be included within the Coastal Area.

PPS8 makes provision for the identification of major areas of open space on development plan maps for information. Whilst the Plan seeks to identify open space for information purposes only, it must be consistent in so doing. We note that the objector’s lands are distinctly similar in character to those of adjacent properties to the west which have not been included, to the same extent, in the area of open space identified in the Plan. The identified area of open space does not appear to follow any logical boundary. We consider that this inconsistency should be addressed in respect of the objection site by excluding land that is in formal use as garden and amenity space by the existing dwelling. Any approved dwelling should also be excluded. It will be for the Department to determine the correct boundary.

We do not consider that justifiable environmental designations in a development plan represent a disproportionate burden when balanced against the objector’s rights to the enjoyment of his private property.

**Recommendation**

We recommend that:

- Any approved dwelling within the site is excluded from the SLNCI, LLPA, and BMA Coastal Area designations and the area identified in the Plan as existing open space.
• Land in formal use as garden and amenity space within the grounds of Ballykillaire is identified by the Department and deleted from the area shown as existing open space in the Plan.

BR 17/02 – Clandeboye (also to LLPA BR 24) 
(Objection 2721)

The objection related to the inclusion of the Clandeboye Estate within the proposed BR 17/02 SLNCI and BR24 LLPA. The Estate comprises a large swathe of land situated on the south-western edge of Bangor. The landform is undulating in nature with areas densely treed and vegetated. Under designation BR24 the Department list a series of features that contribute to the environmental quality, integrity or character of the LLPA. Paragraph 2.24 of Planning Policy Statement 6 – Planning, Archaeology and the Built Heritage states that development plans will, where appropriate, designate LLPAs and contain local policies and guidance to maintain the intrinsic environmental value and character of such areas. There is no reference in PPS6 to there being a requirement for an overriding need for an LLPA designation, as was suggested by the objector.

The designations in question seek to protect the land from inappropriate development, and we are not persuaded that they would unduly interfere with the running of the farm within Clandeboye Estate as was suggested. Agricultural works do not comprise development under the Planning Order and we note that various developments may fall within Part 6 of the General Development Order and not require planning permission in the first place. Notwithstanding these factors, we do not consider the designations to be unworkable as they would still afford protection to the land from potential inappropriate non-agricultural development. We consider that the designations should remain in place and recommend no change to the Plan.

OBJECTIONS SEEKING ADDITIONAL SLNCIS

Blackwood Golf Course 
(Objection 1261/10)

The objection sought the designation of Blackwood Golf Course as a SLNCI. The site lies in proximity to the Clandeboye SLNCI as proposed in the Plan under BR 17/02. This large SLNCI abuts the south-western edge of Bangor and extends across the Clandeboye Estate. The Plan states that the SLNCIs have been proposed on the basis of their flora, fauna or earth science interest. Whilst a golf course could well contain some or all of these interests, no evidence was provided to support this case that would enable further consideration. We recommend no change to the Plan.

OBJECTIONS TO LOCAL LANDSCAPE POLICY AREAS

BR 20- Bangor Central (also seeking identification of land for Health Use) 
(Objections 906/4 & 2024/8)

Both objections sought the removal of lands from the Bangor Central LLPA. Although no map was submitted with either objection, both stated that an area of 1.5 ha should be
identified for health use on the western boundary of the existing Bangor Health Centre. We presume the objection actually seeks land to the east of the Health Centre since its western edge abuts Newtownards Road.

The Bangor Health Centre comprises two buildings and a car park situated on the eastern side of Newtownards Road. The main building is single storey and of a 1970s design. The other building to the rear is a 4 storey block, also of that era. The site sits several metres above the level of the health centre car park and comprises maintained, grassed areas with mature trees and vegetation throughout. There are pedestrian walkways through the site, including one from the Abbey Park residential estate that abuts the site to the south.

The lands east of the Health Centre form part of the proposed Historic Park, Garden and Demesne designation BR 16 at Castle Park. They are an integral part of the Park and have significant amenity value, both visually and in terms of recreation. The lands are also in proximity to the Grade ‘A’ listed Bangor Abbey, a building cited among the features of the LLPA designation. We consider the inclusion of the lands within the LLPA to be justified and they should not be excluded.

Whilst we cannot be definitive about the site without a map, it is likely that development of a 1.5 ha area for health use would cut into the proposed LLPA in a highly intrusive manner given the differences in levels between the Park and the adjacent Health Centre. It would probably also result in the need to remove a number of mature deciduous trees from the land. We have no convincing information that there is a firm proposal for the expansion of the Health Centre, nor a need for additional land at this specific location that would outweigh our concerns. We consider that development of the site could have a significant adverse impact on the LLPA and the site should not therefore be identified in the Plan for Health Use. Our conclusion would not automatically preclude a Health Service proposal on the land. If such were to come forward, it would be considered through the development management process, in the context of the LLPA and other relevant Plan designations. We recommend no change to the Plan as a result of the objections.

**BR 23 - Carnalea**

See BR 17/ 01

**Objection 2550**

This objection was to the inclusion of the general area of Killaire Road within the LLPA designation and the BMA Coastal Area COU3. The objection stated that the designations were unnecessary, but did not provide any explanation as to why this was so. In this context we can make no further comment and recommend no change to the Plan.
Objection 2480

This objection highlighted the area north of Killaire Road but did not refer to any specific element of the Plan affecting the area. The objection stated that the Plan proposals are arbitrary, inappropriate and unnecessarily and excessively restrictive. The Department has provided justification for the LLPA, SLNCI and BMA Coastal designations affecting the area. No explanation was provided by the objector to support the submission, nor to explain how the Plan should be amended. We therefore cannot further consider the matters raised and recommend no change to the Plan.

BR 24 - Clandeboye
(Objection 1469/17)

This objection related to the descriptive text for the proposed designation. The text made reference to Ballysallagh CP School, stating that the building has been de-listed. The objector stated that the reference to de-listing could render the building vulnerable as it could be interpreted as having no merit. The description reference to de-listing is informative in respect of the building. The text lists Ballysallagh School as being of local importance and we do not consider that the existing wording reads as an encouragement to remove or replace the building, or that it suggests the building has no merit. However, we do not see a need for this reference within the descriptive text of BR24 as it adds no value to it and serves no purpose. We therefore consider that the reference to de-listing should be deleted.

Recommendation

We recommend that the words ‘now de-listed’ are deleted from the descriptive text for designation BR24.

BR 31 – Wilson’s Point
(Objection 1920/4)

This objection from NDBC referred to LLPA BR31 and appears in the Department’s spreadsheet as an objection to that designation. However, the objection actually states support for the LLPA. The objection, in fact, relates to the identification of the land around the Esplanade Gardens, Marina walkway and McKee’s Clock Tower as existing open space. The Council submitted that this will, in effect, “limit the potential future development of the site and constrain the area of the site for Council use as community events etc”.

Our conclusions on the identification of existing open space are set out in Part 1 of our report. The area in question is clearly an area of public open space with significant amenity value for both residents and visitors to the area. It would be inconsistent if this extensive area were not to be identified as existing open space in the Plan. This is for information purposes and has no bearing on the applicability, or otherwise, of PPS8 policy OS1 or any other relevant regional policy. We recommend that the Plan should not be changed as a result of the objection.
COAST

Designation BR 32 - Urban Waterfront Bangor
(Objection 1856/7)

The objector sought that development within the proposed Bangor Urban Waterfront should ensure that the population of black guillemots is protected, where appropriate, through siting of more nest boxes. The policy for consideration of development within the Urban Waterfronts is contained in Policy COU5. COU5 makes no references to the protection of birds or other wildlife. It is not the function of the Plan to protect particular species. The impact of development proposals on wildlife would be a material consideration in any application submitted, and dealt with through the development management process. We therefore recommend no change to the Plan in respect of BR32.

OPEN SPACE, SPORT AND OUTDOOR RECREATION

Objections relating to open space at Ambleside Drive/Windermere Drive
(Objections 1920/10 and 3232/3)

The site is an overgrown area between Ambleside Drive and Windermere Drive. It contains a small enclosed electricity sub-station and a number of trees. It is generally level but slopes down towards Ambleside Drive. The site is surrounded by housing. Boundaries consist of post and wire fencing to the roads, and hedging to the houses. The site is unzoned in the Plan and is not identified as existing open space. We note that the site is identified for information purposes as a children’s casual play area within the Open Space Technical Supplement. It is indicated as being in the ownership of the Council and 0.31 Ha in size. This conflicts with the statement in objection 3232 that the site is privately owned.

Objection 3232 argued that the site should not be designated as an informal children’s play area but instead should be zoned for housing in order to reflect the need for additional residential land. It was claimed the site encourages anti-social behaviour and is a nuisance to neighbours. The objector considered that ample open space provision exists in the area. The submission referred to two previous planning applications on the site; a single dwelling, refused in 1996, and six dwellings, withdrawn in 2003. NDBC’s objection 1920 sought the identification of the site as open space in order to acknowledge and protect its value as open space in terms of visual and environmental amenity and benefit to the community.

The house numbering in the surrounding residential estate is one indication that the site was originally intended as undeveloped space. We consider it possible that the reference to Council ownership in the TS is an error and that the current condition of the site is likely to be reflective of the owner’s intentions to develop the land. Current regional policy and guidance requires the provision of open or play space within new housing developments to address the amenity needs of residents, particularly children, and in order to create quality living environments. Many older developments lack such spaces. We do not accept the objector's statement that other open space in the area is within easy reach, particularly for young children. In our opinion it would be entirely at
odds with the thrust of current policy and guidance to permit the loss of an open space within a built up residential area where no alternative open space exists. We do not consider the objector’s suggested ‘Home Zone’ to be a realistic option in this area; such concepts require to be addressed at the road layout design stage. The anti social behaviour on the site is a matter for the Police Service and, in all probability, is exacerbated by the condition of the site. Although some properties are gable-on to the open space, there is a good degree of overlooking of the site from other dwellings. We do not consider that the site requires to meet a particular ‘standard’, as argued by the objector.

We have commented on the housing allocation for North Down in Part 1 of our report. The need for additional housing land, even where it exists, would not outweigh the need to protect open space, which is of value to the community. Given the condition of the site, it is clear that it has little current value as play space; it has marginally more as a green, amenity space. This situation may alter in the future, however, particularly if the Council were to become involved in the provision of resources to improve the land. The Council’s objection is a clear indication that it has an interest in the site. We do not therefore accept that the site should be zoned for housing.

As we have indicated in Part 1 of our report, open space, regardless of whether or not it is identified on Plan maps, benefits from the protection afforded by PPS8 policy OS 1 unless the site is identified for an alternative use in the Plan itself. The Council’s objection acknowledges this policy protection. The site is less than 1 Ha in size, which we have endorsed as an appropriate threshold for the identification of open space in the Plan. Irrespective of the Council’s arguments, we see no need to identify the area as open space on the Plan map. To make an exception would be at odds with our recommendations in Part 1 of our report. We do not consider that the Plan should be altered as a result of the objections.

**Objection seeking zoning of land as open space – North Down Allotments**
(Objection 1261/7)

The objector stated that these allotments, which are not zoned in the Plan, should be designated as open space, as they were in the statutory NDAAP. The allotments are situated to the rear of dwellings fronting Princetown Road and Bryansburn Road, with access from Bryansburn Lane. The site is bounded by mature hedge and some trees at points, with a 2m metal fence fronting the Lane. The land slopes gently down northwards. There are a number of sheds and greenhouses at various locations within the site.

Allotments are listed in point (vii), Annex A, of Planning Policy Statement 8 (PPS8) as open space of public value. The protection contained in the regional policy would therefore apply to the site, irrespective of whether or not it is identified as open space in the Plan. The site is referred to in the Technical Supplement as ‘General Amenity Open Space’ with an area of 0.4 Ha. As such, and in accordance with our recommendation in Part 1 of our report, the land need not be identified as existing open space in the Plan.
OBJECTIONS TO COMMUNITY GREENWAYS

BR 34/01 – Ballycrochan Walkway
(Objection 1920/12)

This objection from NDBC was to the portion of Greenway to the north of East Circular Road. The Department indicated that the subject section of Greenway was shown in the Plan in error and that the designation should have ended at the East Circular Road, in line with the description of the route provided in the Technical Supplement. This addresses the objector’s concerns.

Recommendation

We recommend that the section of Community Greenway to the north of East Circular Road is deleted from the Plan map.
BANGOR TOWN CENTRE

Objection seeking extension of the Town Centre boundary
(Objection 1920/9)

NDBC sought the extension of the boundary in three locations:

Albert Street

This site comprises a row of terraced dwellings containing one vacant commercial property. The terrace is located opposite the car park attached to the Marine Court Hotel. The majority of the dwellings are occupied. The site abuts the Town Centre boundary on Albert Street and Bank Lane.

Prospect Road

This site lies opposite Protected Town Centre Housing Areas BR 46/03-05. It comprises a Presbyterian Church and a row of dwellings, primarily terraced, the majority occupied.

Parkmount

This site contains a row of dwellings, detached and semi-detached, overlooking an attractive area of open space. Bangor Community Hospital lies to the southeast.

The Council has not provided an explanation for its argument in respect of the objection. Bangor Town Centre is an extensive zoning and includes a varied mix of land uses. Ample opportunity exists within the proposed boundary to permit growth and expansion of typical town centre uses. With a few exceptions the objection sites are occupied by residential properties. Although it is commonplace to find dwellings in a town centre, and such is the case in Bangor, we see nothing in the character of the areas in question that would justify amendment of the boundary proposed in the Plan to secure their inclusion within the town centre.

DEVELOPMENT OPPORTUNITY SITES

BR 43 – Lands to the rear of High Street, Stanley road, Holborn Avenue and Clifton Road
(Objection 701/3)

The objector stated that the site should be identified as being suitable for housing or commercial development rather than simply commercial development. The objector also suggested two separate accesses for the development, one onto High Street for any commercial element and the existing access onto Clifton Road for the residential element.

The site comprises several buildings including a snooker hall, retail store, storage and car parking areas. Access is through an entrance and exit from Clifton Road. There is
also a narrow access through from Stanley Avenue. The site abuts residential
development on the eastern, western and northern sides, whilst it is abutted by retail /
service development on the southern side.

In Part 1 of our report we concluded that, depending on the circumstances of individual
sites, the promotion of housing within DOSs was desirable. We consider that given the
character of the surrounding area, housing would be an acceptable use on the site, or a
mixed use development of residential and other appropriate commercial use. We are
not however persuaded of the need to have two separate access points in the instance
where a mixed use development was proposed for the site. High Street has a strongly
defined frontage of buildings that would suffer harm were an access for this site to
penetrate through it. The matter of access for any future development could be
addressed adequately at the planning application stage, as could ensuring that the
proposal respected its surroundings.

Our recommendations in Part 1 stated that DOS KSRs should include only the range of
land uses that are to be promoted within them and the specific constraints that need to
be addressed. Despite the counter-objections, we recommend that the Plan incorporate
a KSR that housing or a mix of housing and other suitable commercial use(s) will be
acceptable within the DOS.

Recommendation

We recommend that the key site requirements for BR 43 state that housing or a mix of
housing and other suitable commercial land use(s) would be acceptable on the site.

BR 44 – Lands between Queen’s parade and King Street
(Objections 1920/5 and 3732)

The NDBC Objection sought the extension of the DOS to include additional properties
on Queen’s Parade, Southwell Road, Kings Street, and Main Street. Objection 3732
sought inclusion of additional land and buildings on Main Street, overlapping with the
Council’s objection site. We note from the evidence that a full planning application had
been submitted in 2005 for comprehensive redevelopment of the site advocated by the
Council.

Our conclusions on the zoning of DOSs are set out in Part 1 of our report and we have
recommended that buildings or land in beneficial use should not be included. For this
reason we do not support the extension of BR 44 to include adjacent occupied
buildings. We have no information as to the status of the planning application on the
site. We accept that a comprehensive redevelopment of this part of Bangor Town
Centre is desirable. However, we do not consider that designation as a DOS is
necessary to achieve this. Regional policy relating to town centres and ATCs,
implemented through the development management process, would ensure that the site
would be developed in an appropriate manner. It is clear from the history of the site that
a comprehensive scheme can come forward in the absence of a DOS zoning. We do
not see an advantage in extending the DOS and the extent of the attached KSRs in this
location in terms of securing regeneration of the area. Irrespective of the Department’s
view, we do not consider that the DOS should be extended as per the objectors’
suggestions, which would include occupied buildings.
It would be consistent with our strategic recommendations to include vacant buildings or land within the zoning provided it resulted in a rational boundary; however, this was not specifically sought by the objectors. We cannot therefore recommend any change to the Plan as a result of the objections.

**BR45 – Lands bounded by Springfield Avenue and Hamilton Road**  
(Objection 1920/6)

NDBC sought the inclusion of the Royal British Legion Hall and the Borough Gymnasium on Hamilton Road, and the Sea Scouts Hall on Springfield Avenue within the BR 45 DOS zoning. It was argued that this would allow a more comprehensive and all encompassing approach to the redevelopment of the site, which is within an ATC.

Our conclusions on the designation of DOSs are set out in Part 1 of our report. We do not consider that a DOS should include land or buildings in beneficial use; given this, and irrespective of the Department’s view to the contrary, we do not consider that either the Royal British Legion premises, or the Council’s Gymnasium, should be incorporated within the subject zoning. This recommendation would not preclude a comprehensive approach to redevelopment of the area in the context of its position within an ATC, should a proposal for such come forward. Inclusion of the British Legion building within the DOS would have no direct bearing on the retention, or otherwise, of the building.

The Sea Scout Hall appears to be disused and the site on which it lies has an unkempt appearance. This building was individually referred to in the objection and we can therefore consider it as a discrete element. We consider that this site should be part of the DOS as it clearly can be described as vacant or underutilised land.

**Recommendation**

We recommend that the Scout Hall at Springfield Avenue is incorporated into zoning BR 45.

**TRANSPORTATION**

**Bangor Town Centre Area of Parking Restraint – Proposal BR47**

**Objection 2760/56**

The objection stated only that the proposed Bangor Town Centre Area of Parking Restraint was overly prescriptive. Proposal BR 47 states that car parking standards within the designated Area of Parking Restraint will be assessed in accordance with Policy TRAN 4 of the Plan. Subject to our recommendations at Part 1 with regard to the amended wording for Policy TRAN 4 we consider that the parking standards are not overly prescriptive. The amended wording of TRAN 4 allows for a reduction in exceptional circumstances subject to provision of evidence of alternative transport measures being clearly demonstrated. We recommend no further change to the Plan.
Objection 701/2

This objection stated that the APR boundary of BR 47 was illogical given that in two locations, Albert Street and Prospect Road, the Area of Parking Restraint (APR) only ran down one side of the street, whilst Parkmount was omitted in its entirety. It was stated that both sides of Albert Street and Prospect Road should have been included in some cases to avoid there being a different parking regime on opposite sides of those streets. The issue of there being differential benefits in the present proposed boundary was raised, along with displacement.

The APR has been designated to correspond to the proposed boundary for the town centre and it is logical that these two are the same. The APR relates to reduced parking standards to be applied to new development proposals in that area, as opposed to parking regimes for existing development. We consider that although the opposite side of Albert Street and Prospect Road would be treated differently in terms of the standard of parking to be provided, this is logical given the town centre boundary and the aim of promoting renaissance of the town centre. Parkmount lies outside the town centre boundary and APR and runs at a right angle to Park Drive. Its context is completely outside the town centre and we see no logic in including the street within the APR.

The fear of displacement was referred to by the objector although we cannot discern what exactly is meant in the context of this objection and therefore cannot comment further on it. We note the counter-objections to this matter and given our consideration above recommend no change to the Plan.

URBAN ENVIRONMENT

Objections to Urban Design Criteria – Policy BR 48
(Objection 2760/57)

The objection related to the Bangor Town Centre urban design criteria (BR 48). The objector submitted revised wording for the 4 urban design criteria which involved inserting the words ‘normally’ or ‘generally’ into each of the criteria. We have already concluded in Part 1 of this report that the wording of Policy UE1 be changed to state that proposals should be ‘in general accordance with the urban design criteria’. There is therefore no need for the inclusion of further wording within the criteria themselves as suggested by the objector. We recommend no change to the Plan.

OBJECTIONS TO AREAS OF TOWNSCAPE CHARACTER

Objections to Bangor Central ATC - BR49
(Objections 3742/1 & 3797/3)

No reasoning or specific arguments were presented that would enable our further consideration of these objections. We cannot recommend any change to the Plan as a result of the objections.
OPEN SPACE, SPORT AND OUTDOOR RECREATION

Objection to the inclusion of Bangor Castle Leisure Centre in an area of identified open space and within a Historic Park, Garden and Demesne
(Objection 1920/7)

The leisure centre site already lies within the proposed Bangor Town Centre; this element of the Council’s objection is therefore misplaced. The Department presented the Inquiry with a Plan showing the Leisure Centre building and its car park removed from the area identified as existing open space. This is in line with our conclusions in Part 1 of our report where we stated that we see no reason why recreational buildings should be identified as such; the same would apply to car parks serving those buildings. We concur with the Department’s position.

Only the area of hard and soft landscaping along the western frontage of the leisure centre is included within the proposed Bangor Castle Historic Park Garden and Demesne (HPGD). This land was clearly once an integral part of the large area of open space/demesne that lies to the north of the Castle. It is accessible from the adjacent footways. It helps to provide a visual frame for the Castle on the approach from the south. We consider that the objection site still reads with the larger area, notwithstanding that its character is somewhat different, containing hard and soft landscaping and footpaths. We agree with the Department that it remains an important element of open space and should continue to be identified as such in the Plan. For the same reasons it should also remain within the HPGD.

Recommendation

We recommend that Bangor Castle Leisure Centre and its car park should be deleted from the area identified as existing open space in the Plan.
HOLYWOOD

OBJECTIONS TO THE SETTLEMENT LIMIT

General objection to Settlement Development Limit of Holywood
(Objection 2007)

This objection indicated that there was insufficient land zoned for housing within the settlement development limit of Holywood. No further arguments were advanced and in light of our recommendations at Stage 1, we cannot consider this limited objection any further. We recommend no change to the Plan.

Lands at Mertoun Hall
(Objection 3133)

The objection sought the removal of the site from ND03 and LLPA HD18 and its inclusion within the settlement limit for Holywood as a DOS, mainly residential. No justification was provided for the objection. We see no basis to disagree with the Plan designations for the site in this context. They appear to be eminently reasonable. The RLW at this location is critical in maintaining separation between Metropolitan North Down and Holywood and development of the site would have a significant adverse effect this role. We have already stated that it would be inappropriate to zone a DOS on land currently outside a SDL. We recommend no change to the Plan as a result of this objection.

Land at Church Road
(Objection 3151)

The objection site extending to 2.3ha is an open agricultural field on the west side of Church Road to the SW of the settlement development limit of Holywood. The roadside boundary is a post and wire fence with intermittent hedgerow. The site rises up from the road to the brow of a hill on the skyline. The boundary fence of No 169, an elevated detached dwelling, demarcates the present development limit with a row of fir trees forming the rest of the northern boundary of the site. A single storey dwelling at No 173 and its hedgerow forms the southern boundary of the site. The objector did not explain why the site should be included in the settlement development limit. In view of the prominent nature of the land, the established boundary of the settlement limit and the absence of any arguments to the contrary, we are not persuaded that the land should be included in the settlement limit. We concur with the Department that to include these lands would result in urban sprawl along the western side of Church Road that would mar the setting of the town. We recommend no change to the Plan.
Land at Browns Brae/Upper Croft Road/Ballymenoch Road/Creightons Green Road

Objections 1323/1 and 3655/1

These objections sought the exclusion of land on the southern side of Browns Brae from the SDL. The site identified is occupied by around 9 dwellings in the Coaches – a modern medium density housing estate – and two dwellings and a block-built shed fronting onto Browns Brae itself.

Irrespective of the line of any previous SDL, the current limit has been drawn to include all of the built development on the southern side of Browns Brae. This development, including the shed, has an urban character and we consider the Department’s approach to be sound at this location. It would be illogical to revert to the limit suggested by the objectors and we recommend no change to the Plan.

Objections 758, 963, 3571 and 3386

These sites fall within a block of land located between Browns Brae and objection site 795 at Ballymenoch Road. Site 3386 has a substantial frontage to Upper Croft Road that is defined by hedges and trees, sparse in places. The site, currently used for grazing, sits above the level of Upper Croft Road and rises steeply towards the southeast. Objection site 3571 is occupied by a large detached property known as Braeside Country House (B&B). The site is surrounded by mature hedges and trees and land within rises from west to east. Site 758, as reduced, has frontage to Browns Brae and comprises a narrow field, rising steeply from south to north. The higher parts of the site contain a good number of trees. Site 963 consists of 3 parcels of land with frontage to Browns Brae, which rises very steeply from west to east. There is an overlap between sites 758 and 963.

All of the objections sought inclusion within the settlement limit for housing. Only objection 758 referred to the proposed HD 15 LLPA in the original submission. One of the notable features of the proposed LLPA is the “Areas of local nature conservation interest - North facing wooded slopes which lie either side of Creighton’s Road, southeast of the Ballymenoch Road” (sic). Site 758 clearly lies in such a location. Site 758 is on the periphery of the proposed LLPA; however, it contains a substantial number of trees and coarse vegetation, which is clearly of nature conservation interest, even in an unmanaged state, and irrespective of its origins. Its importance as habitat was acknowledged by the objector. The absence of a proposed SLNCI designation is not an indication that this is not the case. The site is important to the setting of Holywood, given its elevated position. We consider the LLPA designation on site 758 to be justified and reject the objector’s arguments to the contrary.

We do not consider any of these sites to be comparable to site 795/3570, which contains a number of existing dwellings. When travelling along Upper Croft Road, there are gaps in the roadside vegetation and the prominent and elevated nature of objection site 3386 is readily apparent, as are the treed upper parts of site 758 (which includes the westemmost part of site 963) beyond. Housing development on these lands would be very prominent in the local landscape and would extend the settlement onto an elevated hillside that is important to the setting of Holywood when seen from the hill.
immediate vicinity and from more distant viewpoints to the north, across Belfast Lough. Irrespective of proposals to carry out additional planting, the impact of even low density housing on the lands would be detrimental to visual amenity and the proposed LLPA. Site 3571 has a rural character and the building thereon does not alter this. We acknowledge that the site is well screened and development would be less visible than on adjacent sites. However, this is not justification in itself for inclusion within the urban area. Browns Brae and Upper Croft Road represent logical, defensible limits to the settlement at this location and it would be inappropriate to include the site within the urban area, in isolation. Buffer planting would not alter our conclusion, nor would it provide a better urban/rural interface than currently exists. We do not accept that the inclusion of site 3571 within the SDL would represent rounding off.

We note that the low housing yield, acknowledged to be appropriate by the objectors, would do little to address the accompanying strategic arguments relating to the need for additional housing in North Down. We do not consider that sites 758, 3386, 3571, or the western of the three fields within site 963, should be included within the SDL. The eastern two fields within site 963 are detached from the settlement and it would be illogical to include them within the urban limit. We do not agree that it is appropriate to ‘link’ the SDL at The Coaches with our recommended new limit at objection site 795, which we consider below; the arguments in this respect adopt a two-dimensional approach to the urban edge. Neither do we consider that the development limit on the northern side of Browns Brae should be extended simply to mirror that on the southern side. The apartments constructed further north on Browns Brae do not read with the urban area and their existence does not alter our conclusions. We recommend no change to the Plan as a result of the objections.

**Objections 795, 1920/1, 3570, and 3642**

The NDBC objection referred to the inclusion of Nos. 1, 5, and 7 Creightons Green Road within the settlement limit. The other objections are largely overlapping and sought the inclusion of lands fronting onto the Upper Croft, Ballymenoch and Creightons Green Roads, and a small portion of land to the north of Creightons Green Road. Objections 795 and 3570 referred to housing. None of the original submissions contained any objection to the proposed HD 15 LLPA, which includes all of the subject lands, and we thus do not propose to consider arguments pertaining to this matter. The Department’s final position was that the site would be suitable for housing development.

The area contains a number of dwellings of various styles, sizes and age. The majority of the dwellings are visible from the adjacent roads. The row of road frontage development on the southern side of Ballymenoch Road visually relates to other development inside the SDL. We acknowledge that in plan form, the site appears as a salient of development protruding into the countryside. However, this impression is less apparent on the ground. We must also recognise that the density and form of housing development within the site is such that the character of the land is more urban than rural. We consider that there is considerable logic in the inclusion of the site within the settlement. Creightons Green Road represents a logical northern edge to the limit and we therefore do not consider that the small area within the objection site that lies to the north of the road should be included within the settlement.
The objectors acknowledged that the yield from the site would be limited to the few infill opportunities that exist. The purpose of a housing zoning is to provide certainty that new housing will be secured on the site. In this case the land contains a number of established, occupied dwellings on mature plots. The proposed LLPA will also be confirmed and this will have a strong bearing on any development proposals that come forward. In view of those factors, we consider that it would be inappropriate to zone the site for housing, even with a KSR strictly limiting density. If the site is within the SDL, there would be no obstacle, in terms of principle, to housing development. We recommend accordingly.

We disagree with the point put forward by counter objectors that inclusion of the site within the settlement would compromise the setting of Holywood as the land already contains built development. Its inclusion within the SDL as unzoned land is unlikely to result in any significant change to its character, or that of the locality, particularly given the LLPA designation.

**Recommendation**

We recommend that the site as identified in objection 795 is included within the Holywood settlement development limit, with the exception of the area north of Creightons Green Road.

**Land at Ballymenoch Road**  
(Objection 2197)

This objection sought inclusion of the lands for housing. The objection to the Folk Park/Creighton LLPA HD 15 was withdrawn by the objector at the Inquiry. This site, as reduced, comprises parts of two road frontage fields on the eastern side of Ballymenoch Road. The fields sit above road level and rise towards the southeast. A large, prominent, 2 storey dwelling is located at the northern end of the site. A row of well-screened dwellings lies on lower land on the western side of Ballymenoch Road. The road frontage boundaries are defined by hedges and trees. The eastern boundary is undefined. The Department’s final position at the Inquiry was that the site would be suitable for inclusion within the settlement.

Notwithstanding the roadside hedges, the site is still perceptible through gaps when travelling along Ballymenoch Road. In the winter months the level of visibility greatly increases. From the vantage points the gently rising topography within the site is evident. Dwellings constructed thereon would be prominent and inclusion of the site within the SDL would extend Holywood into land that has an overtly rural character. The existing development on the western side of Ballymenoch Road is very well screened and has little visual impact. The road is a logical and defensible settlement limit at this location. It represents the point of transition between the urban and rural areas. There is no definition to the eastern site boundary that would form a new limit for the settlement and the offer of buffer planting would not outweigh our objections to the inclusion of the site within the SDL, notwithstanding the Department’s acquiescence on the point. We must assess the site as it currently exists and not how it might appear if buffer planting took place. The 100m contour has no definition on the ground. The low density of development proposed does not render the site acceptable; neither, in view of the anticipated yield of 9 or 10 units, would it go far in addressing objectors’ arguments in...
respect of the need for additional housing in Holywood. The absence of a proposed AOHSV designation is not an indication that the land is suitable for development. We agree with the counter objectors that the site should remain in the rural area and recommend no change to the Plan as a result of the objection.

**Land at Whinney Hill/Woodlands Avenue**  
(Objection 763)

This objection sought inclusion of the site within the SDL and its exclusion from the proposed LLPA HD 15. The latter element of the objection was withdrawn at the Inquiry. The objection referred to the Plan’s housing allocation HOU1. The site comprises a number of semi-detached cottages with access to Whinney Hill, a detached dwelling to the northwest of the Cottages, and a very large dwelling set in spacious grounds at Woodlands, accessed off Bangor Road. A well treed area between the Cottages and Knocknatten Avenue lies within the site, as does a grassed area between the Cottages and Whinney Hill. Land in the area rises markedly from northwest to southeast. A laneway runs from Whinney Hill to Woodlands House; however, this was closed off at the time of our visit. The Department’s final position was that the site should be brought within the SDL.

Whinney Hill Cottages lie opposite a modern housing estate at Carlston/Invergourie. Travelling into Holywood, on Whinney Hill, the development on both sides of the road is perceptible and there is an impression of having arrived at the edge of the settlement. This impression persists, notwithstanding the undeveloped treed land between the Cottages and Knocknatten Avenue. In our opinion, the Cottages do not exhibit a particularly rural character. Infill opportunities between the dwellings exist and we anticipate that the urban nature of the site could be reinforced in future. Development on the land to the front of the Cottages would help to consolidate the SDL. The laneway to Woodlands House would represent a strong new physical edge to Holywood at this location. Given the particular characteristics of this part of the site, we consider that it should fall within the SDL.

The grounds within which Woodlands House sits, are spacious and contain a number of mature trees and shrubs. In its current state, this part of the site does not have an urban character and we understand why the Department would have differentiated it from the rest of the development in Woodlands Avenue, which was included within the SDL. We were advised that 4 No. dwellings have been approved within the grounds of Woodlands House. We are unaware as to the current status of the approvals but note that development does not appear to have commenced. In our opinion, these dwellings would greatly alter the grounds and render them similar in character to the development to the northwest and west. The application numbers indicate that the dwellings must have been approved subsequent to the publication of the draft Plan and the latter must have been a material consideration in the Department’s deliberations. Given the planning history, we consider that this part of the site should be included within the SDL.

Whilst the site lies in an area that is transitional in terms of a change in character between town and country, we deem it more appropriate for it to be located within the settlement. We disagree with the point put forward by counter objectors that inclusion of the site within the settlement would compromise the setting of Holywood or result in loss of rural character. The latter could, in any event, only occur outside the urban limit.
The objector referred to TPOs within the lands but did not identify their position and extent. We note that the proposed LLPA must be confirmed within the site, given the withdrawal of this element of the objection. The site also contains a number of existing dwellings, which, presumably, will be retained. The need to protect trees subject to TPO, and the LLPA designation, will inform the design process in respect of any proposals that come forward. The purpose of a housing zoning is to provide certainty that new housing will be secured on the site. There is no such certainty in this particular case. In view of the foregoing factors we consider that it would be inappropriate to zone the site for housing, even with a KSR limiting density to 5 dpha. If the site is within the SDL, there would be no obstacle, in terms of principle, to housing development. We recommend accordingly.

**Recommendation**

We recommend that the site is included within the settlement development limit and left unzoned.

**OBJECTIONS TO HOUSING ZONINGS**

**HD03/01 – Shore Road**
*(Objection 3728)*

This objection was to the zoning of the site for housing. It sought identification of the site as a DOS for a mix of offices and housing. This site has already been developed for housing, and we thus need not consider the objection further. We recommend no change to the Plan.

**OBJECTIONS SEEKING ADDITIONAL HOUSING**

**Lands at Holywood Golf Club (also to identification as open space)**
*(Objection 925)*

The objection related to Holywood Golf Club. It sought inclusion of part of the course within the settlement development for housing, and deletion of its identification as open space. The site lies on Demesne Road on the south-eastern edge of Holywood. The land slopes gently up from the roadside towards the east/south-east within part of the site, the remainder sloping up more steeply in the same direction. The roadside boundary is defined by a line of mature trees and hedge, as are the other boundaries. Part of the site abuts the dwellings fronting Demesne Road. The higher portions of the site to the east are heavily wooded and form part of the Redburn Site of Local Nature Conservation Importance (SLNCI). The clubhouse and parking area are located centrally within the site.

The objectors stated that the site had a limited lifespan as a modern golfing facility given its constricted size and that relocation would be necessary. It was proposed that the lower portion of the site be zoned for housing with the remaining land used for a 9 hole golf course and an area of open space that would be opened to the public. We note that part of the site is already within Redburn Country Park.
The site itself lies on a slope on the edge of the town, contributing to the setting of Holywood. It contains dense vegetation which provides an attractive setting to the town. We agree with the counter objectors that development of the site would adversely impact on the setting of this part of Holywood.

Irrespective of the Club’s perceived difficulties, we do not find the site acceptable for housing. Arguments relating to housing need do not outweigh our conclusion. The suggested planning gain in the form of an area of open space available for public use would not outweigh our concerns in terms of the impact of housing on the remainder of the site and its effect on the setting of Holywood. We recommend no change to the Plan.

**URBAN ENVIRONMENT**

**Objections to HD 07 - Additional Design Criteria, Holywood Conservation Area**

(Objections 544, 1323/5, 1469/19, 2760/62 & 3655/5)

Objection 544 was to the inclusion of the site within the Holywood Conservation Area. Objection 1323 sought extension of the Conservation Area boundary. Objection 2760 referred to HD 07 but stated that the objection was to the Conservation Area designation. Objections 1469 and 3655 sought changes to the Additional Design Criteria. As we have stated elsewhere, we cannot consider objections to Conservation Areas as their designation is outside the ambit of a development plan. In addition, we recommended in Part 1 of our report that Policy UE 2 should be deleted from BMAP. As a result, the Additional Design Criteria in the Plan are rendered redundant. We need not, therefore, give any further consideration to these objections.

**Objections to Holywood North ATC – Designation HD 08**

**Objections 2760/58, 3162/1, & 3576/2**

These were general objections to the designation of the ATC and did not relate to specific sites. As no arguments were presented that would enable our further consideration of these objections, we recommend no change to the Plan.

**Objection 2853/1**

This objection sought the exclusion of the site from the ATC. The site identified by the objector is presently vacant and is situated opposite the underpass under the A2. It is a prominent open site which has no physical boundary definition. The objector did not explain why the site should be excluded from the designation. The site lies in a central position within the northern part of the ATC, and in the absence of any information, its exclusion would be illogical. We recommend no change to the Plan.
Objection 3154/1

This objection sought exclusion of the site from the ATC. The site is at the periphery of the ATC and is occupied by two large semi-detached dwellings positioned gable end-on to the road with a large garden to the north. The roadside boundary of the site is defined by a 2m stone effect clad wall. While this boundary wall presents an unattractive and discordant feature, the dwellings themselves reflect the age and character of other buildings within the ATC which forms the basis of the designation. In the absence of any justification for their exclusion, we consider that the buildings and their curtilages make a contribution to the ATC. We recommend no change to the Plan.

Objection 3655/7

The Holywood Conservation Group requested that the ATC designation should be extended to include the single storey pensioner dwellings at Woodlands which are bounded on three sides by the proposed ATC. While these buildings erected circa1950 are attractive and have a distinctive character, they do not reflect the features and character of the other buildings in the ATC and their inclusion would introduce a discordant element. We therefore recommend no change to the Plan.

The objectors also requested the inclusion of Glenlyon House located at No. 83 Victoria Road. Glenlyon House is a large detached dwelling erected circa 1850, which is located to the east of Glenlyon Park and the River Twisel. Part of the access way and the gardens of the property already fall within the proposed boundary of the ATC. The age and setting of this dwelling in mature grounds with specimen trees merits inclusion in the ATC. Whilst the objectors did not provide a map, a more definitive boundary for the designation would be formed by the curtilage of the property; this is easily discernible on the Holywood settlement map.

Recommendation

We recommend that the boundary of the designation be extended to include the dwelling and all of the grounds of Glenlyon House at No. 83 Victoria Road.

Objections to Holywood South ATC – Designation HD 09

Objection 2760/59

This was a general objection to the designation of the ATC and did not relate to a specific site. As no specific argument was presented that would enable our further consideration of this objection, we recommend no change to the Plan.

Objection 814/1

This objection sought the exclusion of an identified site from the ATC. The objection site abuts the Marine Parade section of the A2 and is highly visible to the large number of commuters using the road every day. Part of the site is formed by its boundary with the Shore Road, a key gateway from the A2 which lies within the town centre. The site
adjoins the existing properties fronting onto the Shore Road and High Street which lie within the Holywood Conservation Area. The site is currently vacant and enclosed by hoarding. Technical Supplement 6: Urban Environment has identified the corner of Marine Parade and Shore Road as a key node in the historical structure of the town. An identified key objective in the TS is to strengthen the street frontage to the A2 to create a coherent image to the town edge. Any development of the site would be prominent and would be readily read in the context of the entrance to the Conservation Area. The objector did not explain why the site should be excluded from the ATC designation. Given the prominence of the site, the sensitivity of the surrounding area and the potential impact on views into the Conservation Area, the site’s inclusion within the ATC is appropriate. We recommend no change to the Plan.

Object 3655/8

The Holywood Conservation Group requested that the ATC designation should be extended at a number of locations. The suggested inclusion of the remainders of Inver Park, Demesne Park and Demesne Avenue seems reasonable as many of these properties have features which are in keeping with the character, age and style of the other dwellings in those sections already included in the designation. We agree that the inclusion of these properties also creates a more rational boundary especially to the east by following the defining line of the boundary of the adjoining Holywood Golf Club.

The properties at Nos 1 to 6 Plas Merdyn, accessed off Church Road, form a cul-de-sac and are located immediately to the north of the dwellings at the end of Demesne Park. The properties on Plas Merdyn form a varied yet coherent group of 19th century dwellings of considerable architectural interest consisting of a large pair of semi-detached stuccoed villas, a 2½ storey suburban terrace and an arts and craft house. The dwellings are set in mature gardens with a backdrop of woodland which is visible from parts of Demesne Road within the designation. The age and setting of these properties reflect key elements of the ATC and merit inclusion in the designation.

The objectors submitted that it would not be appropriate to exclude the land running on the east side of the Demesne Road from its junction with Church Road from the designation as this section runs alongside the boundary of the existing Conservation Area. The identified land includes the strip of land between Demesne Road and 1 and 4 Winsor Avenue and the side or front gardens of 77 Church Road and Nos. 2A, 2, 4, 6, 8A and 10 Demesne Road. The boundaries of these properties are defined by a 1m stone wall which mirrors the slightly higher wall on the other side of Demesne Road demarcating the Conservation Area. While the wall reflects the character of its surroundings and the mature vegetation in the gardens is attractive, the wall and the gardens in themselves do not reflect the features justifying the designation of the ATC. Consequently, the identified land does not merit inclusion in the designation.

While the Group referred to Nos 71 to 113 Demesne Road, located opposite the Holywood Golf Club, as a coherent group of largely unaltered semi-detached houses, the properties at this location also include detached dwellings which vary in style. While many of the properties display features of hipped roofs, shallow porches and bay windows seen elsewhere in the designation, the buildings are of a more recent period of construction circa 1930s. Though the dwellings along with the boundary hedge of the Golf Club provide a pleasant and distinctive approach to this part of the town, they are
visually divorced from the ATC and lie approximately 170m to the south of its boundary. The suggestion to include these dwellings in the designation is not supported.

The houses at Nos 137, 141, 143, 147 and 149 Church Road are an eclectic mix of large detached dwellings of various styles, designs and plot sizes which are quite distinct from the age and character of the other dwellings within the designation. The suggested inclusion of these and the other dwellings located to the SE of Plas Merdyn up to The Spires would not merit inclusion in the designation.

**Recommendation**

We recommend that designation HD09 is extended to include the remaining properties on Inver Park, Demesne Avenue and Demesne Park and Nos. 1 to 6 Plas Merdyn.

**Objections to Bangor Road ATC – Designation HD 10**

(Objections 2060/1 and 2102/1)

The objectors argued that the properties and gardens at Nos. 72 and 122 Bangor Road should be excluded from the ATC designation. These large detached properties are sited towards the southwest edge and the centre of the ATC, respectively. No explanation for their suggested exclusion was provided. In any event, excluding the properties would result in illogical gaps in the designation. We recommend no change to the Plan.

**Objections to Kinnegar ATC – Designation HD 11**

(Objection 3655/10)

Holywood Conservation Group suggested amendments to the key features of the ATC and the Key Design Criteria in the Plan. In view of our conclusions in Part 1 of our report, we do not propose to consider the objection further.

**Objections to Marino, Cultra and Craigavad ATC – Designation HD 12**

**Objections 323/2 and 3655/11**

Objections from the Cultra Residents Association and the Holywood Conservation Group referred to a number of issues in the area. Concerns relating to the effects of new development on infrastructure, drainage, traffic, and the need for new pedestrian footways, are matters for the development management process and are not for this Plan to address.

The objections also referred to the Key Design Criteria for this designation. Our conclusions in Part 1 of our report were that Policy UE3 should be deleted, a detailed character analysis undertaken, and a design guide produced for each individual ATC. This latter document should be supplementary guidance to the Plan. In light of this we have not commented on objections to either the key features of the ATCs or new/amended key design criteria suggested, including those relating to trees.
The NDAAP contained a Policy Zone relating to plot size in Cultra/Craigavad in order to “protect the inherent qualities of this locality”. The objectors argued that this policy should be retained in BMAP. We do not consider that there is a need for such a policy, given the ATC designation, which is also intended to protect the area’s character. Impact on the area will be a matter for the development management system. It would be for the Department to consider the issue of plot size when producing the design guide for HD 12.

**Objection 346 (Also to BMA Coastal Area)**

The objector sought the exclusion of No. 17 Seafront Road from the ATC designation and the BMA Coastal Area. We were not presented with any reasoning to explain why the property should be excluded from either designation. This large detached property is sited within the northwest part of the ATC and its exclusion would create a large gap in the designation along Seafront Road, which would be illogical. We have concluded elsewhere that the boundary of the BMA Coastal area should not be reduced to exclude the properties along Seafront Road. We recommend no change to the Plan as a result of the objection.

**Objections 3552 and 3573/2**

Objection 3552 was to the Key Design Criteria for HD 12. Objection 3573/2 was a general objection to the designation of the ATC. No specific arguments were presented in either submission that would enable our further consideration of the objections. We recommend no change to the Plan.

**NATURAL ENVIRONMENT**

**OBJECTIONS RELATING TO SLNCIS**

**HD 13 – Objection seeking additional SLNCI Designation**

(Objection 3655/14)

The Holywood Conservation Group sought designation of a glen between Nos. 2 and 20 Ballymenoch Road as a SLNCI. The objectors argued that the site was an important habitat for badgers. No plans were submitted to identify the extent of the objection site but from our site visit, we assumed it to comprise a small stream which flows to the west of No. 20 Ballymenoch Road and No. 2 Ballymenoch Lane. We were provided with no information about the broader nature conservation interests on the site and we are not persuaded of the need for a SLNCI at this location as badgers are already afforded protection under the Wildlife (Northern Ireland) Order 1985. We recommend no change to the Plan.

**OBJECTIONS TO PROPOSED LLPAS**

**HD 14 – Ballymenoch LLPA**

(Objections 2060/2 and 2102/2)
These were general objections to the designation of the LLPA. However, no specific arguments were presented that would enable our further consideration of the matter. We recommend no change to the Plan.

**Objection to extend HD 15 – Folk Park / Creighton LLPA**
*(Objection 3655/2)*

The Holywood Conservation Group argued that the LLPA designation should be extended to include properties on the northwest side of Ballymenoch Road up to Croft Road, including the grounds of The Rudolph Steiner School. The roadside boundaries of these properties are defined for the most part by mature trees and hedgerows with other trees within gardens. Though some clearance of trees appears to have taken place within a number of the properties between Nos. 26 and 34, the roadside trees are a notable feature when driving along Ballymenoch Road. While the objectors stated that the trees on this side of Ballymenoch Road are highly visible in views from Cultra and the A2, these are for the most part intermittent, transient views which are restricted by intervening vegetation along the A2. The trees on more elevated ground within the designation are more discernible from these perspectives and are more crucial in contributing to the setting of Holywood. Nonetheless, the trees and gardens of the properties along this side of Ballymenoch Road do contribute to the environmental quality and character of this part of Holywood. We are persuaded that they are worthy of protection by inclusion in the LLPA and listing as a feature.

The objectors suggested that reference should be made to a lane known as King John’s Highway which reputedly was the route taken by King John on his journey from Holywood to Dundonald. The lower part of the lane which rises quite steeply from Princess Gardens to the north of No 26 Ballymenoch Road is bounded by mature trees and hedgerows and provides pedestrian access. This part of the historic laneway falls outside the proposed LLPA designation. The other part of the identified historic route falls within the LLPA and consists of the lower part of Creightons Green Road up to Creighton Wood. This mix of pedestrian laneway and public road does not read as one feature. Nonetheless, given the local amenity value of the lower part of the laneway and its local historic significance, we are persuaded that it is worthy of protection by extending the LLPA to include it and that reference should be made to it as a notable feature.

The objectors suggested that reference should be made to two other features; firstly the woodland which they describe as protected to the rear of Whinney Hill Cottages located off Whinney Hill. From the elevated approach travelling north along Whinney Hill, the woodland and cottages are a notable feature of environmental quality which contributes to the character of this part of Holywood. It would be appropriate that reference is made to it as a notable feature. Secondly, it was suggested that reference should be made to the grounds of Ardvon House at 16 Glen Road. This is a large house set in mature grounds. However, is not of such distinction that it would merit mention as a notable feature in itself. We recommend accordingly.

**Recommendation**

We recommend that:
The designation should be extended to include:

- The properties on the northwest side of Ballymenoch Road up to Croft Road, including the grounds of The Rudolph Steiner School, and,
- The lane from Princess Gardens to the north of No. 26 Ballymenoch Road known as King John’s Highway.

Reference is made to Whinney Hill Cottages and the protected woodland to the rear as a notable feature of the LLPA.

**HD 16 – Glenlyon / Twiselburn LLPA**
(Objection 3655/3)

The Holywood Conservation Group requested that the LLPA designation should be extended to include a number of features of amenity value. A tree-lined lane is located to the north of the designation and extends from between 18 Victoria Road and 2 Tudor Park and emerges beside 15 Bangor Road. The lane provides pedestrian access in the oldest part of the town and is within an unspoilt part of the Holywood Conservation Area. We agree that the lane and trees are of high amenity value in the area and are worthy of protection by inclusion in the LLPA.

The area to the south of the LLPA designation including Plas Merdyn and the grounds of the houses to the east up to The Spires and wooded glen to the south was identified as worthy of inclusion. Plas Merdyn is a development bounded by mature trees with a backdrop of woodland which is visible from parts of Demesne Road. The trees also contribute to views on the approaches along Church Road and are of amenity value and worthy of inclusion in the LLPA. However, the area to the east of the properties of Plas Merdyn is not judged to be of sufficient amenity value to merit inclusion in the LLPA.

The designation already extends to the north of Church Road and includes a number of properties to the north of Twisel Burn. As these properties are visible from Croft Road and Browns Brae, there would appear no justification for extending the LLPA further to the north.

The objectors suggested that specific reference be made to a number of features within the designation including the gardens in front of Riverside Terrace and to the rear of 94-110 Church Road and hall at 92 Church Rd which are within the Conservation area. We agree that the layout of the gardens is unique and merits mention as a feature of the LLPA designation. The avenue of lime trees at rear entrance to the Holywood PS from Church Road marks the boundary between the Conservation Area and ATC. The trees are of amenity value and provide a feature of local significance which is worthy of mention. We therefore consider that they should be specifically mentioned in the designation.
Recommendation

We recommend that:

- The designation HD 16 be extended to include the lane which extends from between No. 18 Victoria Road and No. 2 Tudor Park to beside No. 15 Bangor Road and the grounds of the properties in Plas Merdyn and their woodland backdrop;

- Specific reference is made under the relevant bullet points to the gardens in front of Riverside Terrace and to the rear of Nos. 92-110 Church Road and the avenue of lime trees at the rear entrance to the Holywood PS from Church Road.

**HD 19 – Redburn LLPA**
(Objection 3655/4)

The objectors requested that the LLPA designation should make specific reference to the local amenity importance of Nun’s Walk and the field beside it. Nun’s Walk is a tree lined avenue that serves as the main vehicular entrance to Holywood Golf Club off Demesne Road. Public views of the adjacent field are limited by the trees on the avenue and by the roadside hedge along Demesne Road. While the avenue is an attractive feature of the LLPA, we do not consider that it is of such amenity value or local significance that it merits specific reference as a key feature of the LLPA. We recommend no change to the Plan.

**Objection to non-designation of Sullivan Upper playing fields as an LLPA**
(Objection 3655/14)

This objection relates to the non designation of an LLPA in respect of the playing fields at Sullivan Upper School, Loughview and Spafields accessed off the Belfast Road, and the associated avenue of trees on the A2. These playing fields have been identified as areas of existing open space in the Plan and are already afforded protection under Policy OS1 of PPS8: Open Space, Sport and Outdoor Recreation. As their amenity value, landscape quality and local significance in terms of their contribution to the setting of the town when viewed from the A2 are already protected under regional policy, we are not persuaded of the need for a designated LLPA at these locations. We recommend no change to the Plan.

**OPEN SPACE, SPORT AND OUTDOOR RECREATION**

**Objection to failure to zone land for open space at Invergourie Road**
(Objection 240/1)

This objection identified a parcel of land situated between Invergourie Road and Kintyre Avenue. The land forms a level green area to the south side of Invergourie Road and falls away steeply to Kintyre Avenue. Though the site is located within designation HD14 Ballymenoch LLPA, the objector questioned whether it should have been identified as open space. While areas of open space over 1 hectare within the BMAP area are identified on maps for information only, areas of open space below 1 ha such
as the objection site are not identified. Policy for the protection of open space is contained in PPS8: Open Space, Sport and Outdoor Recreation and Policy OS1 applies to all open space whether or not it is indicated in a Plan Proposal Map for information. Therefore, we are not persuaded of the need for this existing area of open space to be identified. We recommend no change to the Plan.

OTHER MATTERS

Objections to the BMTP Strategy and the absence of specified proposals therein (Objection 1529)

This objection was submitted by the Holywood Road Safety Committee. As we have stated elsewhere, BMAP is not the appropriate forum for amending the content of the BMTP. The roads proposals in this Plan emanate from the BMTP and not vice versa. As such, the merits of the schemes suggested by the objectors is not a matter that we can consider further. We recommend no change to the Plan.
**HOLYWOOD TOWN CENTRE**

**Designation HD 22 – Town Centre Boundary**
(Objection 3301)

The site comprises two sheltered housing complexes and a public car park south of the town centre. No reasoning, evidence or analysis was provided to support the objection. We agree with the Department’s general approach to the effect that the defined town centre should focus on the area in retail use and should be defined to concentrate new development in order to support the vitality and viability of the town centre. The site identified is in residential use and provides valuable parking to support the town’s economy. We do not consider that it should be included within the town centre. As the site is in use already we do not consider that it is a candidate for designation as a DOS. No evidence was provided to substantiate the objection merely a bald statement that the site should be included in the town centre as a DOS. There is therefore no basis for us to consider further in relation to the objection. We recommend that there should be no change to the Plan as a result of this objection.

**Designation HD 23 – Primary Retail Core**
(Objection 814/2)

The site is a designated DOS within Holywood town centre. We were presented with no evidence to support the inclusion of the site within the Primary Retail Core. We note from our site visit that a mixed use development is proposed on the site. Even if this includes an element of retail we agree with the Department that the Primary Retail Core should remain focussed on the main street of the town. We also note that the planned development has not been constructed. In the absence of any statement of case from the objectors we cannot consider the objection further.

**Objection to HD 28 – Urban Design Criteria, Holywood Town Centre**

**Objection 2760/61**

This was a general objection to the urban design criteria. However, no specific argument was presented that would enable our further consideration of this objection.

**Objection 3655/12**

This objection by HCA related to the second criterion and submitted that the building height of development facing the Holywood By-Pass/Marine Parade should not be determined by a minimum height factor but rather by good appropriate design. The Technical Supplement states that a key objective is to strengthen the urban form and character of the western edge of the town and create an edge of urban scale and quality. This western edge directly relates to Marine Parade/Holywood By-Pass. We consider that the 2\textsuperscript{nd} urban design criterion, stipulating that heights in this part of the town shall generally be 4 storeys with a maximum of 5 storeys on corner sites, is
appropriate in this context and is consistent with the key objective of strengthening the western edge of the Town Centre.

Concerns were raised by the objectors that there may be conflict between the urban design criteria and PPS 6 in relation to Holywood Conservation Area. The only part of the Conservation Area adjacent to the By-Pass is at Shore Road. We note that the policy states that buildings shall ‘generally’ be of the specified height and that heights shall step down to a minimum of three storeys where they meet Shore Road. We consider that cognisance has been taken of the scale of buildings in the Conservation Area in drawing up these height requirements and see no inherent incompatibility between the policy requirements and those of PPS 6. The setting of existing buildings including their scale, form, materials and detailing are factors that must be taken into consideration in the determination of individual proposals. Good appropriate design responsive to its context is implicit in all design proposals and it is not necessary to specify this requirement in policy. Accordingly, we recommend no change to the Plan.

DEVELOPMENT OPPORTUNITY SITES

Seeking DOS at Patton’s Lane, Holywood
(Objection 1920/8)

This objection related to the non-identification of lands at Patton’s Lane as a development opportunity site. No map was provided to confirm the extent of the objection site. Patton’s Lane is a pedestrian footpath linking High Street and Church View. It lies partly within the proposed Primary Retail Core and partly within the Town Centre. Both ends of the Lane are defined by the side gables of the occupied properties at 82 and 84 High Street and 33 and 35 Church View. Of the 7 properties facing onto Patton’s Lane, only No 5 is occupied and in use. No. 6 is an unoccupied two storey dwelling; the other 5 properties are single storey flat roofed buildings which were former commercial premises but are now bricked up.

We see considerable benefit in a redevelopment of this part of the Town Centre. However, zoning of the site as a DOS will not actively achieve this. Nor will failure to identify a DOS hamper regeneration. We have not been presented with any land use proposals. Given this, and the lack of clarity over the site’s exact boundaries, we cannot consider the objection further and recommend no change to the Plan as a result of the objection.
NORTH DOWN VILLAGES


Elevate made objections to every village settlement limit. We propose to deal with them generically in this section. The rationale for each settlement limit is set out in the relevant section of the Plan. The RDS in chapter 8 at SPG-RNI 3 states that within the BMA the strategy is to consolidate villages and resist their large-scale expansion. We have recommended that the limits of villages are strictly controlled in Part 1 of our report with several exceptions related to small scale expansion of certain villages for particular reasons. We cannot therefore agree with the generic argument that the settlement limits are too restrictive. We consider that the limits generally allow for sufficient growth in the context of villages being towards the bottom of the settlement hierarchy and that there are opportunities for further development within limits. The objections did not specify any sites for inclusion and therefore we cannot consider the inclusion of any land as a result of these objections anyway. We shall consider the individual site specific objections received below. We recommend no change to the Plan as a result of these objections.

CRAWFORDSBURN

Objections to the Settlement Limit

Lands to the rear of Crawfordsburn Country Club (Objection 643)

The objector sought the inclusion of approx 1 ha of land to the rear of Crawfordsburn Country Club within the development limit. The objector stated that the retention and enhancement of its existing club facilities which is a long established community facility can only be achieved by the redevelopment for residential purposes of the front portion of the site and the relocation of the club facilities (building and open space uses) to the rear. Almost all new buildings would be facilitated within the development limit and the new bowling green, tennis courts and parking would be outside the limit. The alternative for the club is to sell the site for redevelopment and move elsewhere.

We note that at present the Country Club within the development limit is vacant and could be redeveloped for housing which would make a significant windfall contribution to housing growth in the village. We also note that there is a planning application for a replacement Country Club facility with bowling green, tennis courts, underground parking, 17 houses and 33 apartments.

The objection site is bounded by the development limit along its western, northern and eastern boundaries and consists of grasslands which rise gradually towards the southern boundary. The site sits into the urban form and would be suitable for open space or recreational use; displacement of the existing facilities to accommodate
housing is, however, undesirable in strategic terms in view of our conclusions about the scale of development required at this level in the settlement hierarchy.

Whilst we acknowledge the community benefits of the Country Club within the village, in view of the current condition of the buildings, it is unclear if the proposal is still being pursued. Even if it remains a firm proposal, we have insufficient evidence of the Club’s financial circumstances to conclude that there is a necessity for extension of the development limit in order to sustain it or to balance its needs against the implications of additional housing in the village. In all the circumstances, we consider that the proposals would be more appropriately evaluated through the development management process which would allow full consideration of the Club’s circumstances and proposals in the context of PPS8. If found acceptable, the different elements of the proposal could be secured by condition or by means of an Article 40 agreement if appropriate. Accordingly, we recommend no change to the Plan as a result of this objection.

OTHER MATTERS

Objection seeking additional childcare facilities in Crawfordsburn
(Objection 975/1)

The objection stated that childcare facilities in the Crawfordsburn ward are urgently needed and that the Plan should allow such development.

Area plans focus on the wider needs of the Plan area over a specific period of time and we are satisfied that such provision is more appropriately achieved through the development management process. In any case, the objection did not proffer a specific site for such facilities. We are not persuaded that the Plan should specifically identify land for this use and recommend no change to the Plan.
GROOMSPORT

OBJECTIONS TO THE SETTLEMENT LIMIT

Lands at Donaghadee Road
(Objection 1836)

The objector sought the inclusion of approx 10 ha within the development limit for housing. The objection lands comprising of agricultural fields extend along the Donaghadee Road and the Springwell Road and rise towards the south to an undefined boundary. We consider that development on the objection lands would appear prominent and would significantly extend development into the open countryside resulting in excessive growth and sprawl. Notwithstanding the linear roadside development to the western side of the Springwell Road, inclusion of this large objection site would result in development out of scale relative to the size of the existing village. Accordingly, we recommend no change to the Plan.

URBAN ENVIRONMENT

Objections to GT 05: Groomsport Area of Village Character

Objections 355 & 1679

These objections stated that additional key design criteria should apply to the AVC. Our recommendations in Part 1 concluded that Policy UE 3 should be deleted and a detailed character analysis undertaken and design guide produced for each individual ATC/AVC. This document should be produced in the form of supplementary guidance to the Plan. In light of this we will not comment any further on objections to the Key Design Criteria proposed. We recommend no change to the Plan.

Objection 2852

This objection referred to designation HD 08 but actually relates to the Groomsport Area of Village Character. We refer in the above paragraph to the issues relating to the Key Design Criteria.

The submission highlighted property at Main Street and sought its exclusion from the AVC. No reasoning for the objection was provided. In any event, such an exclusion would leave an illogical ‘gap’ in the centre of the designation. We recommend no change to the Plan.
HELEN’S BAY

OBJECTIONS TO THE SETTLEMENT LIMIT

Lands at Craigdarragh Road

Objection 3129

This objection sought the inclusion of 3.35 ha within the development limit. The objection site abuts the settlement limit and the railway line to the south of the village which strongly defines the settlement edge. Development on this prominent site would extend development out into the open countryside beyond the railway line creating an illogical limit and significant urban sprawl to the south. Its inclusion would not consolidate or create a compact village form and we consider that its inclusion would be unacceptable. We also consider that the objection site is not an appropriate location for a DOS due to its rural location. Accordingly, we recommend no change to the Plan.

Objection 3392

This objection sought the inclusion of 1.77 ha within the development limit for housing. The site is isolated and divorced from the settlement limit. It would therefore be illogical to include it within the settlement limit as it is free standing and unrelated to the existing urban form. We recommend no change to the Plan.

Lands at Bridge Road
(Objection 2173)

The objection site extends to 1.24 ha and is a triangular wedge formed by the railway line to the north, Bridge Road to the south west and an access road into Wightman’s Plantation and Crawfordsburn Country Park to the south east. The site slopes up from Bridge Road and is screened by a mature roadside hedgerow and by a wooded area along its south west and south east boundaries respectively. The site is visually separated from the existing village development limit defined by the railway line and bridge spanning Bridge Road. A dwelling is located on the most western part of the site and planning permission has been granted for the erection of three other replacement dwellings on the north east part of the site which is well screened and not visible from the road. The siting and low density of the existing and proposed dwellings coupled with the boundary screening would continue to portray a rural setting distinct from the character of development to the north within the proposed development limit. While the mature boundaries of the objection site could provide a natural limit, the railway line presently provides a stronger, more definitive boundary. That the site would provide a natural limit similar to that of the Wightman’s Plantation to the north is not persuasive as this area of planting also lies outside the settlement limit. The site and its setting are distinct from the character of the site referred to by the objector at Milltown in Castlereagh which was brought within the development limit in BMAP. Given the character of the objection site and its visual separation from the rest of the village we are not persuaded that the development limit should be amended. We therefore recommend no change to the Plan.
Objection to Housing Land Use Policy Areas HY 02/01 and HY 02/02  
(Objection 1135)

These Housing Land Use Policy Areas are two relatively small sites located on Bridge Road and adjacent to 8 Old Fort respectively. The objector did not elaborate on what the nature of his objection was to either designation. As a dwelling has already been constructed on each site, we do not need to consider these objections any further. We recommend no change to the Plan.

URBAN ENVIRONMENT

Objections to Helen’s Bay Area of Village Character – Designation HY 03

Objection 74/1

The objector challenged the designation of the AVC and specifically the inclusion of the properties on the SW side of Bridge Road from opposite the Golf Road to the Railway Cottages. While a number of new properties have been constructed within the AVC on sites created by the sub-division of plots following the demolition of individual dwellings, we do not consider this has been substantial over the whole of the AVC nor is it so extensive that it would undermine the rationale for its overall designation as set out in the character appraisal for the AVC.

In respect of the protrusion of the AVC to the SE along Bridge Road extending from No 20 to No 6, this part of the village has been subject to change. The recent subdivision of the plot at No 8 for the current construction of a separate dwelling and the development of the maisonettes for Trinity Housing at Nos 12-14 have contributed to a change in the character of this part of the village. While the detached dwelling at No 6 exhibits features which are reflective of architectural qualities of classical and Italianate houses such as full height bowed bays, projecting architrave and cornice to the doorcase, the other detached dwellings at No 8 and 10 and the semi-detached dwellings at Nos 16-18 exhibit few characteristics associated with such period dwellings. The combination of the changes in the character of this part of the AVC, the lack of period features on the majority of the properties which form the basis for the designation and the peripheral location of the objection site warrants the exclusion of this finger of development from the designation.

Recommendation

We recommend that the objection site is excluded from HY 03.

Objection 110

This objector challenged the general designation of the AVC and specifically the inclusion of No 1 Kathleen Drive within its boundary. While the Department has allowed the subdivision of plots by demolition of dwellings and erection of higher density development on parts of Kathleen Avenue, this has not been to such an extent as to irreparably change the character of the village of Helen’s Bay or undermine the overall

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rationale for the designation of the AVC. No 1 Kathleen Drive is sited in a central location within the AVC and specifically reflects the design and style of the other detached Arts and Crafts timber clad dwellings within Kathleen Drive. It also reflects the age and character of other dwellings in the vicinity of Kathleen Avenue which form the basis of the designation and its inclusion within the AVC is justified. The exclusion of the property from the designation would be illogical. We therefore recommend no change to the Plan.

Objection 989/1

This objection related to the inclusion of a large tract of land within the designation encompassing five properties facing onto Church Road, the public toilets and car park on Fort Road and the four dwellings which comprise Sheridan Grove, a cul de sac off Fort Road. However, no explanation was provided as to why this large part of the AVC should not be included. This part of the AVC has been subject to change with the clearance of the former building on the plot between Nos 50-52 Church Road and granting of planning permission for 4 semi-detached dwellings. Planning permission has also been granted for a dwelling on the side garden of No 4 Sheridan Grove. Nonetheless, this part of the AVC retains much of the village’s historic built form and layout with most of the buildings exhibiting architectural features commensurate with Edwardian and Arts and Crafts periods which form the basis for the designation. In the absence of any justification for their exclusion, we recommend no change to the Plan.

Objection 1135

This objection related to the nature and extent of the AVC and specifically to the inclusion of Bennet House on the east side of Kathleen Avenue. No further explanation was given in respect of this objection. Bennet House is a large Italianate dwelling which is situated in a central location within the historic built form and layout of the village. Although the property has been subdivided into 4 separate dwellings, it still retains many of its original architectural features. Given its central location within the AVC and the absence of any justification for its non-inclusion, the exclusion of Bennet House would not be logical or warranted. We recommend no change to the Plan.

Objection 1759

This objection sought the exclusion of part of the property at 19 Bridge Road from the designation. The objection site is located at the junction of Bridge Road and Kathleen Avenue. The proposed boundary of the AVC at this location does not follow any physical feature and appears to cut through the middle of the dwelling on the site. This is inconsistent with the extent of the AVC elsewhere where the boundary tends to follow curtilages of the dwellings. Temporary fencing sections demarcate the site boundary and though some mature trees have been retained, open views are available into the site. The dwelling on the site is of limited architectural merit and its setting has been compromised with no visual separation from that part of the property outside the AVC which is currently being developed for new housing. The inclusion of a small part of this property seems illogical and hence its inclusion is inappropriate. A more appropriate
boundary for the AVC would be achieved by following the perimeter boundary of the property along Bridge Road and Kathleen Avenue.

**Recommendation**

We recommend that the AVC boundary is amended to exclude all of the property of No 19 Bridge Road.

**Objection 3556/1**

This objection related to the inclusion of lands adjoining Fort Road and Grey Point. The site also has a prominent location at the junction of Fort Road and Church Road and at a pedestrian entrance to the Crawfordburn Country Park. The site has been the subject of recent redevelopment. The layout and design of the new housing has altered the character and appearance of this prominent site. As it no longer retains any of the vestiges of the justification for the AVC, the inclusion of the objection site within the designation is not appropriate.

**Recommendation**

We recommend that the objection site adjoining Fort Road/Grey point is excluded from the AVC designation.
SEAHILL

OBJECTIONS TO THE SETTLEMENT LIMIT

Lands at Craigdarragh Road

Objection 47

Objection site 47 (approx 7.44 ha) partially abuts the south east of the settlement limit. It is bounded by the Belfast Road to the south and Craigdarragh Road to the east. The site contains undulating agricultural lands and is visible and prominent from both Belfast Road and Craigdarragh Road. Development on the objection site would contribute to urban sprawl extending development significantly along both roads. At present the development limit provides a strong boundary and clear definition to the village. The objection site does not sit into the urban form and its inclusion would project development into the open countryside creating an illogical development limit.

The objector also sought the inclusion of a smaller portion of the objection site between Enfield House and the first property on the western side of the Craigdarragh Road. This portion of land is isolated and detached from the settlement limit. It would be illogical to include it within the settlement limit as it is free standing and unrelated to the village form. Accordingly, we recommend no change to the Plan.

Objections 2945 & 3434

Objection site 2945 contains objection site 3434 which is to be considered in 2 parts. Portion (1) comprises of the field on the Seahill side immediately adjacent to Martello Drive and (2) is the field to the rear of properties on Craigdarragh Road. The large objection site 2945 is located off the Craigdarragh Road and consists of a large detached dwelling set within extensive well maintained gardens and 2 fields to the south and west of the dwelling (portion 1 and 2 of 3434). It abuts the settlement limit along its northern and western boundaries. Development on this 9.4 hectare site would create excessive growth and expansion of Seahill which we consider to be unacceptable both in principle and in relation to the scale of the village. The northern boundary of Portion (1) of objection site 3434 is formed by the railway line and to the west is Martello Park. It rises steeply from the railway line to the south and sits above the railway line and development along Seahill Road. In view of our conclusions about the scale and growth appropriate to the villages, we consider that development on portion (1) which is 3.38 ha would still lead to excessive growth in one direction and cause urban sprawl to the south eastern side of the village out into the open countryside. We consider this objection site to be out of scale relative to the size of the village in terms of achieving the objectives of consolidation and compact village form. We conclude elsewhere that there is no justification for a small settlement to be designated along the entire length of the Craigdarragh Road. Therefore portion 2 to the rear of dwellings on the Craigdarragh Road is an isolated site, detached from the settlement limit and unrelated to the built form of Seahill. We recommend no change to the Plan.
**Lands at Craigowen Road**  
*(Objection 3757)*

This objection sought the inclusion of lands within the settlement limit and exclusion from the Seahill Coastal Area LLPA (SL 05). This 4.93 hectare site abuts the eastern boundary of the development limit, is bounded by the railway line to the south east and lies within the extensive LLPA. It consists of agricultural fields, one of which is relatively flat containing trees and steep banks along the railway line and the other is steeply sloping and wooded. We consider that inclusion of this objection site would result in an excessive extension of development into the open countryside creating urban sprawl to the east of Seahill which would also be detrimental to its setting. We consider the objection lands to form an integral part of the LLPA, due to location, topography and landscape attributes. The site also lies within a SLNCI and development would have an adverse impact on these features. We recommend no change to the Plan.

**Lands at Carney Hill**  
*(Objections 420, 926 & 927)*

These objections sought the inclusion of land within the settlement development limit. Objection 420 sought all or part, stating that it was a natural rounding off of Seahill. Objections 926 & 927 sought the inclusion of two portions of land roughly corresponding with 420.

The sites comprise two large areas of agricultural land situated to the south of Seahill, lying on either side of the Carney Hill lane. The land to the west of the lane abuts the southern edge of the dwellings at Seahill and slopes down from both the edge of the settlement and Carney Hill lane towards a watercourse. The landform also rises then drops steadily to the south in line with the topography of Carney Hill itself. The boundaries are predominantly defined by mature hedge, save for the southern boundary of objections 926 & 927, which is undefined.

The land to the east of Carney Hill is bounded by the Bangor Road to the north and the Ballymoney Road to the east. The land slopes upwards from Ballymoney Road to the west, gently at first and then more steeply as it approaches Carney Hill. There are several detached dwellings along the eastern boundary that lie on Ballymoney Road. The site boundaries are predominantly mature hedge, aside from a stretch of post and wire fencing along Ballymoney Road.

Inclusion of these large objection sites would result in development out of scale relative to the size of the existing village and would be excessive at this level of the settlement hierarchy. The eastern parcel of land does not read with the settlement given the steep drumlin top at Carney Hill lane and the vegetation thereon. It forms part of the setting and approach to the settlement for Seahill when travelling towards Holywood and its development would read as urban sprawl when viewed from both the Bangor and Ballymoney Roads. The western parcel, whilst adjacent to the development in Seahill, does not lie within the natural form of the settlement, even if much of the land cannot be seen from the public road network.

We agree with the counter-objectors that this land should remain outwith the settlement development limit and recommend no change to the Plan.
Lands between Holywood and Seahill  
(Objection 2773)

The objection sought the inclusion of land within the settlement development limit between Holywood and Seahill. Correspondence dated July 2005 was produced at the Inquiry, identifying the land as that on the southern side of the A2, between the draft Plan development limits of Seahill and Holywood. It was argued that the land in this area was already built up and the two settlements had already conjoined. The objection went on to say that the decision to exclude this area was arbitrary and disadvantaged those living outside the limits. It was stated that new development could be controlled through the imposition of density requirements to maintain the character of the Cultra / Craigavad area.

The landform slopes steadily upwards from the Bangor Road in a southerly direction. Portions of the land fall within two proposed LLPAs, SL 05 and HD 15. The original objection made no reference to these designations.

The presence of development within the site, and the absence of a RLW designation, are not factors which dictate that the land should be included within the SDL. Whilst much of the subject area has been developed for one-off dwellings, there are various gaps/undeveloped plots between the buildings, and this, together with the mature vegetated boundaries, maintains a sufficiently rural ambience that allows this area to be distinguished from the settlements of Seahill and Holywood. We disagree with the objector that development within the objection site resembles that within Seahill, to the east and that there is no distinction between Holywood and Seahill at present. We do not agree with the submission that inclusion of the site within the SDL would be the optimum way to ensure separation between the two settlements. The RLW ND 05 lies on the opposite side of the A2. Inclusion of the site within the SDL would result in a landscape wedge on the northern side of the road and a continuous settlement on the southern side; this would be illogical.

If the site remains within the rural area, we do not agree that landowners would not have certainty about the development potential of land since regional planning policy in PPS21 provides for new development in rural areas. It is notable that the objection lands have lain outside the settlement limits of adjacent settlements for some considerable time. The fact that residents within the rural context are subject to a different policy context to those within the urban area does not justify inclusion of the land within the settlement limit.

Reference was made to the density requirements in the statutory North Down and Ards Area Plan 1984 – 1995 (NDAAP). This was a policy that controlled development through a plot size policy for Cultra / Craigavad. We are not persuaded that the existing character of the area would be retained through the imposition of similar density controls as inclusion of the land within the limits of development would allow for much greater scope for new building with potential loss of existing vegetation and consequent detrimental change in character.

The fact the RDS does not recommend a maintained separation between Seahill and Holywood does not justify inclusion of the objection lands within the settlement development limit. We agree with the Department that the area in question should remain in the rural area and that there should be no change to the Plan.
Whilst the objector’s written submission in response to the Departmental rebuttal also attacked the inclusion of part of the site within the SL 05 LLPA, this is outwith the scope of the original objection and cannot be considered.

**OBJECTIONS TO HOUSING LAND USE POLICY AREAS**

**SL 02/01**
(Objection 2626/7)

Seahill Residents had various concerns and sought clarification in relation to this designation. We note that these objection lands have been developed and therefore the objection is no longer relevant. We recommend no change to the Plan.

**SL 03/01**
(Objection 717)

The Department confirmed that the objection lands were included within the overall planning approval for SL 03/01. We consider therefore that these objection lands do not need to be included within the housing land use policy area. Accordingly, we recommend no change to the Plan.

**NATURAL ENVIRONMENT**

**OBJECTIONS TO SLNCIs**

**Designation SL 04/03 Rockport Coast and St Columbanus**
(Objection 2626/4)

The objectors stated that a large area has been omitted from the SLNCI designation. NIEA confirmed that this central field was not included within the designation as it had been reseeded and the improved grasslands were not of sufficient importance to merit inclusion within the SLNCI. The objector indicated that they were content with this explanation. Accordingly, we recommend no change to the Plan.

**OBJECTIONS TO LLPAs**

**Designation SL 05 : Seahill Coastal Area**
(Objection 2626/3)

The objectors stated that there was no protection within the LLPA for the Ulster Way. The only routes protected in the Plan are Community Greenways. The Ulster Way would have protection under other legislation. Its protection is not within the remit of this Plan. However, we consider that the Ulster Way is an important feature and should be listed as a key feature of the LLPA.
The objectors also sought the addition of 3 listed buildings to bullet point 3. The Department conceded that references to these should be included. We see no reason to depart from the Department’s position and recommend accordingly.

**Recommendation.**

We recommend that the Ulster Way should be listed as a key feature of the LLPA and the 3rd bullet point should include references to the following listed buildings; Craigowen Lodge, No. 208 Bangor Road and Glencraig House.

**Designation SL 07 Carney Hill**  
(Objection 1983/1)

The proposed LLPA encapsulates the property of Westwinds which falls within the development limit of Seahill and includes two agricultural fields outwith the limit. However, the features or combination of features cited for justifying the designation refers only to the derelict house at Westwinds and associated vegetation and does not refer to the fields. The boundaries of Westwinds are defined by mature trees and the dwelling is not visible to any significant degree from outside its curtilage. Though the dwelling has some local significance, it is not listed and does not exhibit any particular architectural merit. The property formed part of the lands which were the subject of an unsuccessful planning application. In a subsequent appeal decision in March 2007, it was established that there was no Departmental objection to the demolition of the dwelling and that the importance of the LLPA was more to do with its landscape setting. The elevated setting of the mature trees around Westwinds is visible from approaches to Seahill. The trees undoubtedly contribute to the local amenity and character of Seahill and are worthy of protection. However, it is noted that the trees are already afforded protection by a Tree Preservation Order (TPO). Therefore, the designation of an LLPA for their protection is not required and is not appropriate.

**Recommendation**

We recommend that Designation SL 07 is omitted from the Plan.

**General Objections to lands at St Columbanus**  
(Objection 3486)

The objection related to the St Columbanus house and grounds situated at Seahill. Objections are to its inclusion within the Rockport Coast and St Columbanus SLNCI, BMA Coastal Zone and LLPA SL05. The objection sought the land designated as a DOS.

St Columbanus house comprises a large listed building last used as a nursing home. It sits within mature grounds with mature trees and vegetation throughout. It is accessed via a long laneway from the Craigdarragh Road which drops below the level of the road.

The objection did not state why the site should be excluded from the environmental designations. We also consider that the objection site is not an appropriate location for
a DOS as it is located within the rural area. We can therefore make no further comment and recommend no change to the Plan.

OTHER MATTERS

Objections seeking zoning of Open Space
(Objection 2626/5)

Seahill Residents sought an open space designation within the Coastal Park SLNCI and the adjacent wooded glen. The Department confirmed at the Inquiry that the objection lands lie outside the settlement limit and Open Space is indicated ‘for information only’ within the settlement limits. The objector indicated that they were content with this explanation. Accordingly, we recommend no change to the Plan.

Objections of a General Nature
(Objection 2626)

Seahill residents generally objected to the lack of community facilities within Seahill. We note the Department’s comment that it has consulted the relevant bodies with statutory responsibility for service provision and where it has been advised of a specific proposal for the provision of facilities land has been identified. It would not be appropriate to identify land for this purpose in the absence of an identified need by the statutory providers. However, any proposals for community facilities can still come forward if required through the development management process.

The renaming of Seahill is not a matter for the Plan. Accordingly, we recommend no change to the Plan as a result of these objections.

Objection to absence of transportation proposals to meet development needs in Seahill Area
(Objection 2626/6)

The BMTP contains Roads Service proposals for the BMA. It deals with all aspects of transportation planning for public and private transport. BMAP seeks to ensure that land use proposals are in line with those in the BMTP. This Plan cannot amend the BMTP and we cannot, therefore address the issues raised in the objection. We note that the development proposal at Carney Hill, to which the objection refers, was dismissed at appeal in 2007 and that, in terms of growth in Seahill, little expansion of the settlement has been provided for in the Plan.
NORTH DOWN SMALL SETTLEMENTS

General Objections to the Settlement Limits of Small Settlements

Elevate made objections to almost every small settlement development limit. We propose to deal with them generically in this section. We have recommended that the limits of small settlements are strictly controlled in Part 1 of our report. We cannot therefore agree with the argument that the settlement limits are too restrictive. We consider that the limits allow for sufficient growth in the context of small settlements being at the bottom of the settlement hierarchy. In any case as no specific amendments were suggested to settlement limits then these objections cannot result in any changes to these limits. The designation of LLPAs accords with the Plan Strategy and as development is not precluded within LLPAs then there is no need to extend development limits to compensate for them. Several other objectors referred to various settlement limits and claimed that they did not offer any opportunities for new development. We would question the veracity of this assertion in most cases and even if it were true it would not be a factor that should be taken into account in the consideration of individual objections, given our strategic conclusions on the expansion of small settlements.

CRAIGANTLET

OBJECTIONS TO THE SETTLEMENT LIMIT

Objections 248 & 720

This small settlement comprises of 4 nodes of development and the limit has been drawn to prevent their further encroachment into the open countryside. Development of objection site 248 would lead to an extension of the Dunlady Road node across open countryside towards the Holywood Road node which would result in ribbon development along Holywood Road. We agree with the Department that the objection site is exposed and prominent along the Holywood Road.

Objection 720 sought the inclusion of 2 portions of land at either side of the crossroads. We consider that development on either portion would appear prominent and exposed. Development on portion A would extend development across open countryside from Craigantlet Cottages to the Dunlady Road node. Notwithstanding the existing dwelling sited in the middle of this roadside swathe of land, inclusion of the objection site would constitute ribbon development rather than consolidation of the settlement form. Development on portion B would also extend road frontage development from the Mission Hall node across open countryside to the junction. Development on either portion would represent urban sprawl on open and prominent land. We consider both objection sites to be excessive in relation to the size of the nodes within the settlement and the settlement overall. Inclusion of the objection sites would be unacceptable in principle given our conclusions in respect of the role of small settlements at lowest tier of the settlement hierarchy and due to their topography and characteristics. Accordingly, we recommend no change to the Plan.
SIX ROAD ENDS

OBJECTIONS TO THE SETTLEMENT LIMIT

Objections 31 and 1762

Both submissions were on behalf of Ballygrainey Presbyterian Church. Objection 31 sought the inclusion of a strip of undeveloped land to the north of No. 459 Gransha Road within the settlement limit. The land is in an overgrown state and is bounded by a ditch and hedge along its northern side. Its southern edge is undefined. The objection referred to an approval for a car park extension in the area immediately to the east of the church and No. 459 and stated that the church would seek a new manse on the objection site. The objection also stated that the Plan should take into account the (then) proposed road scheme and existing development to the west and south of the proposed settlement limit. Objection 1762 referred to the impact of the new road scheme on the settlement and sought the removal of the church from the proposed LLPA SS 002.

Ballygrainey Presbyterian church is a listed building and is named in the Plan as one of the features justifying the designation of the LLPA. We consider this logical, given the prominent position of the church in the settlement and local landscape, and its historic interest. It would be unjustified for one of the main features of an LLPA to be excluded from it and we therefore reject the objector’s submission.

The SDL at Six Road Ends has clearly been drawn to incorporate the majority of development in the immediate area, to utilise Gransha Road and Cotton Road as strong, defensible limits, and to retain a compact form for the settlement. We consider that inclusion of additional development to the south and west would extend the settlement unnecessarily. The new road scheme has been implemented. It includes a roundabout to the south of the Orange Hall, a new section of road, also south of the hall, linking through to Cotton Road, and a new link from Cotton Road to Ballycrochan Road. The old section of Ballycrochan road now truncates to the north of No. 531. All of the new roads are outwith the proposed SDL. There are now areas of vacant land between No. 531 Ballycrochan Road and the Old Ballycrochann Road, and immediately adjacent to the Orange Hall. Incorporation of these areas into the limit would be logical, since the new roads would form strong physical limits for the settlement. However, these changes would result in the creation of development opportunities out of keeping with the status of Six Road Ends in the settlement hierarchy.

With regard to the land in church ownership, we note that the northern limit to development in the settlement is undefined and runs through a field. We agree with the objector that this is an artificial boundary. The northern boundary of the field would have represented a more logical SDL; however, this also would result in the creation of an inappropriate development opportunity. We therefore agree with the Department’s approach in defining the limit at this location. A new car park has been constructed to the rear of the church; this would appear to be ample for the needs of a good sized congregation. The area to the east of No. 459 Gransha Road, within the proposed SDL, remains undeveloped. This area would be more than capable of accommodating a new manse. We recommend no change to the Plan as a result of the objection.
SUGGESTED NEW SMALL SETTLEMENTS

Junction of Craigdarragh Road/ Belfast Road
(Objections 764,3434 & 3684)

We recommended a small settlement is designated at the junction of Craigdarragh Road and the Belfast Road in Part 1 of our report. We shall now consider the extent of the small settlement. Objection 3684 and 3434 sought large swathes of land which contain dwellings set back from the road along both sides of the Craigdarragh Road stretching from the Belfast Road as far as Helens Bay. Objection 764 sought lands within this around the junction of Craigdarragh Road and Belfast Road. The objection lands offer potential for considerable expansion of the limit which we consider to be unacceptable given our conclusions regarding the role of small settlements. The Department identified a much reduced settlement limit that omitted lands to the south of Belfast Road and west of the Craigdarragh Road, concentrating the settlement limit to the eastern side of the Craigdarragh Road only. This was generally agreed by the objector of site 764 with the exception of the lands to the west of Craigdarragh Road which they stated would provide opportunities for consolidation. We agree with the Department that the Craigdarragh Road forms a logical western boundary as objection lands beyond this contain prominent open fields and a farmhouse set back from the road. This land visually relates with the open countryside to the north rather than the built form. Given our conclusions in respect of the role of small settlements we consider that the concentration of development to the east of Craigdarragh Road and at Grays Park should be the extent of the defined settlement.

Recommendation.

We recommend that the boundary of the small settlement at the junction of Belfast Road and Craigdarragh Road is as shown on the attached Plan 3.
NORTH DOWN COUNTRYSIDE AND COAST

OBJECTIONS TO HISTORIC PARKS, GARDENS AND DEMESNES

Designation ND 01/04 Guincho (also LLPA SL 05 & SLINCI SL 04/01)
(Objections 3210, 3522).

The objection lands are the historic gardens at Guincho which are included within the Register of Parks, Gardens and Demesnes of Special Historical Interest for Northern Ireland. The basic layout of the gardens created in 1947 is retained and contains mature beds, lawns, borders, a stream and glasshouses, as well as a mature wooded shelterbelt. The gardens have historical and visual merit. The plants originally formed a very valuable collection, including specimens from famous collectors. The objectors have not forwarded any reasons why this historic garden should not be designated in the Plan. We have considered the information provided by the Department including their consultant’s reports and visited the site and conclude that the designation is merited.

For the same reasons we consider that the LLPA – SL 05 in which the objection lands are included and Blackhill SLINCI which applies to the south western portion of the site, should not be removed. Accordingly, we recommend no change to the Plan.

OBJECTIONS TO RURAL LANDSCAPE WEDGES

OBJECTIONS RELATING TO ND 03 – HOLYWOOD RURAL LANDSCAPE WEDGE

Objection to the failure to designate an Urban Landscape Wedge (ULW) at the Harbour Estate
(Objections 2965/144 & 3819/6)

The objection sought the extension of ND03 – Holywood Rural Landscape Wedge (RLW) to include an area of land adjacent to Kinnegar waste treatment works. It was claimed that this would be an extension to an Urban Landscape Wedge and would be appropriate because there was a landscape wedge including these lands in the previous BUAP. The submission argued that their proposal would separate Belfast and Holywood and link important habitats with the countryside. The Department considered that a wedge was not required at this location as there is no need to separate different localities. It should be noted that these comments were made in the context of the objection relating to a suggested ULW and not a RLW extension.

Much of the site is a SLINCI (HD13/02), which is not the subject of objection and so is protected under policy ENV2. The site would not separate communities because it is between the Harbour Estate and Holywood. This part of the BHA is not intensively built-up due to the presence of the airport runway. It would not therefore merit designation as an ULW. The Department did not address the point of an extension of ND03 RLW into this area. It would appear to meet the criteria for designation in Policy COU2, equally as well as the designation in the Plan. This area also previously formed part of a landscape wedge as defined by BUAP. The case for the site’s inclusion is stronger...
Planning Appeals Commission

now with the new development that has taken place in the area such as B & Q and Sainsbury’s. We would recommend that the Department includes the objection lands in Designation ND03.

**Recommendation**

We recommend that the site is included in Designation ND03 – Holywood Rural Landscape Wedge.

**Lands at Knocknagoney**

(Objections 2760/3, 2760/4 2760/51, 2760/60 & 2760/64)

This objection relates to an area to the rear of the Tesco store at Knocknagoney. The site had planning permission for an extension to the store and so the objector considered that it should be removed from ND03 and included within the settlement limit (MND01). They also suggested that the site should be excluded from LLPA HD18 – Maryfield. The Department agreed with all these matters because of the extant planning permission which has now been implemented. We agree that the Plan should exclude the area that has been developed and recommend accordingly.

**Recommendation**

We recommend that the site is excluded from Rural Landscape Wedge ND03 and LLPA HD18, and that the site is included within the settlement limit (MND01).

**OBJECTIONS RELATING TO ND 05 – SEAHILL RURAL LANDSCAPE WEDGE**

**Land between Seahill and Helen’s Bay**

Objections 2626/8 & 3655/13

Seahill Residents sought the extension of ND 05, creating a RLW between Seahill and Helens Bay to prevent the coalescence of the 2 villages and also to the south and north of the village. Objection 3655 stated that a Rural Landscape Wedge (RLW) was required between the settlements to protect the land from the pressure for development in that area. The RLW would also protect the settings of these settlements. No map was provided with 3655 to identify the area suggested for designation.

The Department conceded that a RLW should be applied to the east of Seahill between the village and Helens Bay. Given the strategic functions of RLWs to distinguish and maintain the separate identities of settlements, preventing merging and protecting the setting of settlements, we agree with the Department that the land to the north of the Bangor Road and east of Seahill as far as the Craigdarragh Road should be designated as a RLW. We also agree that the RLW is unnecessary to the south of the village as there are no settlements to the south. It is also unnecessary to the north extending out to the coast. The objection lands which we consider to merit a RLW designation to the east of Seahill cannot be considered as an extension to ND05 and therefore we recommend a separate RLW. We note that the map supplied with objection 2626 does not suggest extending the RLW as far as Helens Bay. Objection 3655, however, refers
to the area between the settlements, which addresses the omission. We remit the matter to the Department for consideration of the boundaries of the RLW.

**Recommendation**

We recommend the designation of a RLW to the east of Seahill, extending to Helen’s Bay. The extent of the designation is remitted to the Department.

**Objection 3854**

This objection was to the “landscape wedge delineation” in relation to No.1 Station Road, Holywood. Although no map was provided to identify the property, it would appear that the dwelling in question lies on land between the A2 and the railway line, which is outwith the proposed wedge. We do not therefore need to consider the objection further and recommend no change to the Plan.

**OBJECTIONS SEEKING DEVELOPMENT/ZONINGS IN THE COUNTRYSIDE.**

**Land at Guincho**  
(Objection 3522)

The objector sought housing on lands at Guincho, Craigdarragh Road outside the settlement limits of Helens Bay and Seahill within the rural area. It is not appropriate to zone the land for housing as it is not within or adjacent to a settlement. No case was put forward for the objection lands to be included within any nearby settlements. Housing in the rural area is a matter for the development management process. Therefore, we recommend no change to the Plan.

**Land at Green Road, Bangor**  
(Objection 3482)

This site lies in open countryside, roughly mid-way between Bangor and Six Road Ends. It straddles Green Road and comprises a large portion of agricultural land and a complex of buildings, some of which appear to have had a commercial use in the past, but which are now largely derelict.

The objection sought designation of a DOS; there was no reference to a land use in the original submission. The subsequent submission refers to housing and employment uses. The objection also referred to the proposed Ballygrainey Dismantled Railway SLNCI and AOCMD designations. The objection did not seek inclusion of the site within the SDL.

No part of the site is within the SLNCI in question and we need not consider this element of the objection. Our recommendations in respect of AOCMD are set out in Part 1 of our report. Our conclusions on the zoning of DOSs are also contained in that document. The site is physically separated from the proposed settlement limit and other
objection sites where inclusion within the urban area is sought. Irrespective of the previous uses of buildings on the land, it would be inappropriate to apply a DOS zoning to this site in the open countryside as it would serve no purpose in terms of urban regeneration. Regional policy generally presumes against new housing and employment development in the countryside.

The North Down Area Plan 1972 proposals have no relevance to BMAP. Our conclusions on strategic housing matters are contained in Part 1 of our report. The accepted need for a small additional allocation for housing in North Down does not outweigh our conclusions in respect of the site. Neither does the physical suitability of the land for development, its accessibility, or the improvements to infrastructure that development of the site may provide. We have no evidence that the employment zonings in Bangor are inadequate. In any event, regional policy seeks to secure employment uses within urban areas. We fail to see how comprehensive development of part of the rural area would be a desirable goal. We recommend no change to the Plan as a result of the objection.

**Objection seeking Employment zoning at Donaghadee Road, Bangor**
(Objection 689)

This site comprises two fields on the southern side of Donaghadee Road, around 0.5 km from the proposed development limit. A dwelling lies to the west of the site, and a complex of farm buildings to the east. The objection, which erroneously stated that the site was within the urban limit, stated that the land has excellent access standards and is on the main road network with connections to Belfast, Newtownards, Bangor, Donaghadee, and beyond. The objector stated that additional employment land is needed to meet the demand for business and employment opportunities resulting from the growth in housing supply in the surrounding area.

We have no convincing evidence that there is a need for additional employment land in Bangor. In any event, the site lies well outside the urban area, where regional policy presumes against the establishment of new industrial or commercial development. We do not consider that the site should be zoned for employment use and recommend no change to the Plan.

**OBJECTIONS RELATING TO BMA COASTAL AREA**

**Land at Seafront Road, Cultra - Objection to extent of the BMA Coastal Area**
(Objection 3574/2)

This objection related to the extent of the BMA Coastal Area and in particular to the inclusion of the properties on the landward side of Seafront Road, Cultra. It was argued that the boundary of the designation should not extend beyond Seafront Road itself. We note that Seafront Road demarcates the extent of the boundary of the Belfast Lough Ramsar, ASI and ASSI and that the properties fall outwith these designations. Apart from the Royal North of Ireland Yacht Club and the Richmond Nursing Home, the properties on Seafront Road consist of dwellings, associated outbuildings, gardens and driveways. The buildings are generally level with Seafront Road and are set in large
plots with extensive front gardens. While it was submitted that these properties are well above high water mark, are not part of the shoreline and have no significant landscape or environmental importance, the setback of the buildings from Seafront Road provides a pleasant landscape setting which forms part of the coastal landscape at this location. Inclusion in the designation does not preclude the principle of development and Part 1 of the Report has recommended rewording of Policy COU4 which would allow for appropriate new development or redevelopment within existing domestic curtilages provided that no harm would result in respect of the coastal landscape and its nature conservation interests. We are not persuaded that boundary of the BMA Coastal Area should be reduced to exclude the properties along Seafront Road. We recommend no change to the Plan.
APPENDIX 1 – PLANS

Plan 1  Objection 1920/18 – Extension to BR 14 ATC

Plan 2  Objections 36, 876/2 and 3369 – Exclusions from BR 15 ATC: - Glen Park and Cedar Mount

Plan 3  Objection 764 et al. – New Small Settlement at Craigdarragh Road/Belfast Road junction
Plan 1
Objection 1920/18
Extension to
ATC BR 14

III Proposed extension to boundary of Bangor
East ATC BR14.
Plan 2
Objection 36
Area to be excluded from ATC BR 15
Appendix 3:

Belfast Metropolitan Area Plan 2015 - Public Inquiry
Appendix 3 - Craigdarragh Road

- Proposed Settlement Development Limit

Plan 3
Objection 764 et al
SDL for new settlement at Craigdarragh Road