

Planning Statement

Queen's Parade, Bangor

May 2026

Turley

Contents

Executive Summary	1
1. Introduction	2
2. Site and Surrounding Context	3
3. Planning History	4
4. Proposed Development	6
5. Legislative & Planning Policy Context	8
6. Planning Assessment	12
7. Conclusion and Planning Balance	25

Executive Summary

This statement supports a full planning application for a destination children's play facility, associated short-stay car parking and the relocation of an approved pavilion building within Marine Gardens, Queen's Parade, Bangor. The proposal forms part of the wider Phase 1 Marine Gardens redevelopment and must be considered in that context.

The principal issue for determination is whether the limited loss of existing open space is outweighed by the accessibility, regeneration, tourism and community benefits of the proposal. For the reasons set out in this statement, the proposal satisfies the Policy OS 1 exception and is acceptable in principle.

The proposal will deliver a regionally significant inclusive play facility, support the wider Queen's Parade regeneration, improve Bangor's visitor offer, and provide meaningful community benefits for residents and visitors. The proposed parking is modest in scale but essential to inclusive access, particularly for disabled users, families with young children, older visitors and others with reduced mobility.

The supporting technical work demonstrates that the proposal is acceptable in relation to access and traffic, flood risk and drainage, natural heritage, built heritage and residential amenity. The scheme has also been designed to integrate with the wider Marine Gardens public realm and to retain a high-quality waterfront environment.

Read in the context of the wider Marine Gardens and Queen's Parade regeneration, the benefits of the proposal decisively outweigh the limited loss of open space. The proposal accords with the relevant planning policy framework and should be approved.

1. Introduction

- 1.1 This Planning Statement has been prepared in support of an application for full planning permission for development at Queen's Parade, Bangor.
- 1.2 The application is made on behalf of Bangor Marine Ltd, hereafter referred to as 'the applicant', and seeks permission for:

"Proposed development of a children's play park, associated car park and relocated 'pavilion' building, including associated access, landscaping, and ancillary works."

- 1.3 This application is linked to the wider 'main' planning permission (ref: LA06/2024/0559/F) for the redevelopment of Queen's Parade.
- 1.4 This planning application is submitted alongside a non-material change (NMC) application relating to the above planning permission. The NMC application seeks to revise the 'Phase 1' design the new Marine Gardens public realm to account for the area of the site covered by the proposed play facility, together with other minor changes.

Purpose

- 1.5 The purpose of this statement is to provide an overview of the proposal, assess it against key planning policies, and set out the material considerations to be weighed in determining the planning application.
- 1.6 In drawing these conclusions, reference is made to the drawing package and technical assessments which form the suite of documents submitted as part of the planning application.
- 1.7 The statement is structured as follows:
- **Section 2** provides a description of the site and the surrounding context;
 - **Section 3** sets out the planning history pertaining to the site;
 - **Section 4** describes the proposed development and its relationship with the wider Queen's Parade regeneration;
 - **Section 5** examines the policy context relevant to the determination of this planning application;
 - **Section 6** sets out our consideration of the proposal against key policies; and
 - **Section 7** provides a summary of, and conclusions arising from, the above.
- 1.8 While this statement summarises the key elements and findings of the other application documents and explains how the proposal complies with prevailing planning policies, the application submission should be read as a whole.

2. Site and Surrounding Context

- 2.1 The application site is linear and extends to approximately 0.66ha. Aerial imagery is provided at **Figure 2.1** below, showing the site within its surrounding context.



Figure 2.1: Aerial image of site and its surrounding context

- 2.2 The site is developed and comprises part of an area of public realm located along the Bangor Marina waterfront. It consists predominantly of former car parking, maintained grass, hardstanding and footways, and incorporates seating areas, a fountain, and some trees and shrubs. The site is delineated to the south by an approximately 1m high stone wall. The marina lies directly north of the site.
- 2.3 To the east of the site lies the Queen's Parade car park, currently under development to provide a new area of public open space comprising Phase 1 of the Queen's Parade redevelopment¹.
- 2.4 To the south, a terrace mostly comprising residential dwellings fronts Queen's Parade. Additional areas of public realm are located to the west of the site. Pedestrian access to the site is currently taken from three points, with vehicular access from the Queen's Parade mini-roundabout.
- 2.5 The character of the site is reflective of its city centre location and its proximity to the marina, with a range of retail and service uses along Main Street. Established residential areas are located to the south, while leisure and recreational uses, including open space and Pickie Fun Park, lie to the north adjacent to Bangor Marina.
- 2.6 The site is predominantly flat. Land to the south, along Queen's Parade and the adjoining three-storey terraced housing, sits higher, resulting in an approximate fall of 3-4 metres towards the site.

¹ Planning permission reference: LA06/2024/0559/F

3. Planning History

- 3.1 Planning permission was originally granted under application reference LA06/2020/0097/F for a comprehensive redevelopment of lands within the Queen's Parade, Main Street, King Street and Southwell Road area. The location of this development is illustrated below at **Figure 3.1**:



Figure 3.1: LA06/2024/0559/F Aerial Location Plan

- 3.2 The scheme incorporated the redevelopment of Marine Gardens Car Park, including partial demolition of the sea wall to facilitate a new public realm along the waterfront.
- 3.3 Planning permission for the Queen's Parade Regeneration Project was granted (reference LA06/2020/0097/F) in October 2022. In February 2023, a Section 54 application (ref: LA06/2023/1500/F) was submitted to amend Condition 2, to allow elements of the development phasing to be delivered concurrently, and Condition 3, relating to the provision of public realm. This application was approved in December 2023.
- 3.4 A Non-Material Change (NMC) application was subsequently approved in October 2024 under reference LA06/2024/0614/NMC, to update the approved landscape design for Marine Gardens.
- 3.5 Concurrently, a further Section 54 application (ref: LA06/2024/0559/F) was granted in November 2024 for additional amendments to conditions attached to the original planning permission. This subsequent planning permission updated the approved phasing plans. In effect, this means that all of the Marine Gardens public realm area now falls within Phase 1, rather than being split between Phase 1 and Phase 2 as previously approved. LA06/2024/0559/F is the permission that has now been implemented, following discharge of all pre-commencement conditions pertaining to that phase.

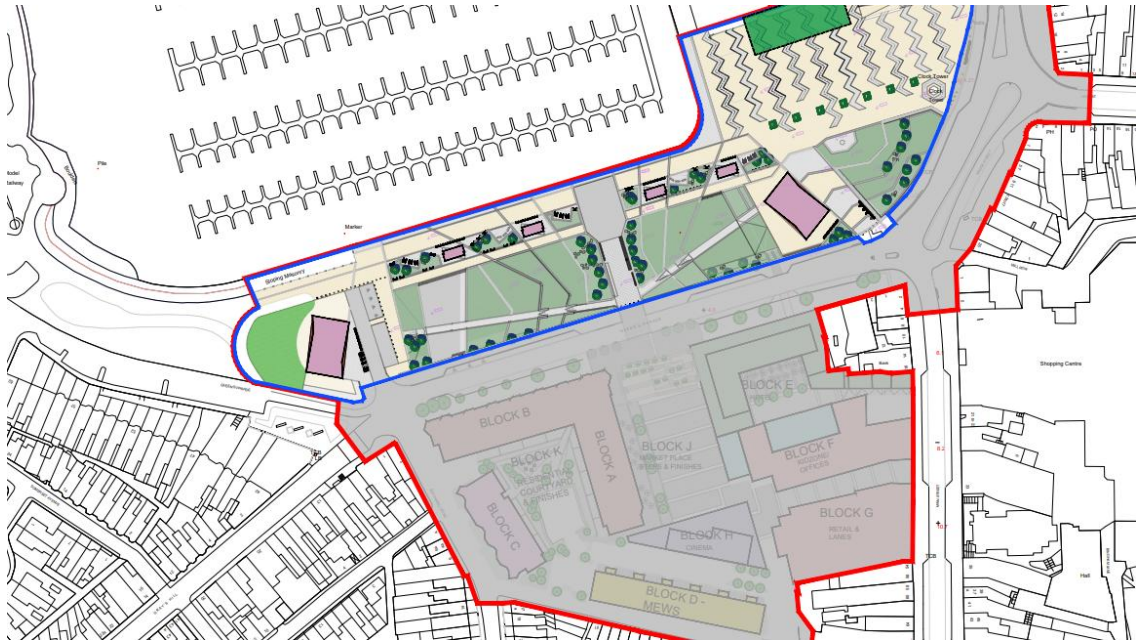


Figure 3.2: LA06/2024/0559/F Phase 1 Layout

- 3.6 Separately, planning permission was granted in February 2025 under application reference LA06/2024/0572/F for a children's play area within Marine Gardens. That extant approved development overlaps with the site boundary of Phase 1 of the 'main' permission and includes the provision of play equipment, safety surfacing, seating, boundary fencing and associated landscaping.
- 3.7 Importantly, a significant number of the existing trees are to be removed under the extant planning permissions, evident within Figures 3.1-3.3.



Figure 3.3: LA06/2024/0572/F Aerial Location Plan

4. Proposed Development

Details of the Proposal

- 4.1 The proposal comprises three main components:
- Play Facilities
 - Car Parking
 - Relocated Pavilion Building
- 4.2 The proposed play facilities cover an area of 2,073 square metres, approximately 1,500 square metres and around four times larger than the smaller play park previously approved. The play facility will have direct access from the promenade and the wider Marine Gardens. It will include:
- A 'Cliff Rocks and Ship' themed children's climbing frame area
 - Other themed play areas for varying ages and abilities
 - Sculptures
 - Climbing nets, swings and other play equipment
 - An internal 'Adventure Path' and other sensory pathways
 - Seating furniture, lighting and planting
- 4.3 The second part of the proposal comprises car parking to serve the play facilities. A total of 81 parking spaces will be provided, including 8 disabled access spaces, 23 family spaces (wider than standard), and 4 dedicated electric vehicle charging spaces. These will be accessed via the existing roundabout to the south on Queen's Parade, using the existing spur from the roundabout. A turning circle at the western end of the site will provide sufficient space for vehicles to turn, limiting any congestion within the site.
- 4.4 The car park will be charged at a rate to be agreed with the Council outside the planning process and will include height restrictions to prevent access by unsuitable larger vehicles. The parking tariff will be set to encourage short-term use by families and those using the play facilities and wider Marine Gardens, while discouraging longer-term parking.
- 4.5 A 1-metre wide landscaped buffer is proposed along the southern boundary of the site, alongside native tree planting to provide visual screening and softening of the site.
- 4.6 In addition, the relocated western 'pavilion' building is included within this planning application. The pavilion is one of two benefiting from extant planning permission (LA06/2024/0559/F). Relocation further east is required to accommodate the play facility.

Relationship with Phase 1 Redevelopment

- 4.7 The proposal is directly linked to, and forms part of, the wider Marine Gardens redevelopment. It includes the relocation further east of one of the approved pavilion buildings, together with associated realignments to accommodate that change.
- 4.8 The remaining associated changes will be secured through a separate consenting process to vary the relevant conditions and approved drawings.
- 4.9 Care has been taken through the design process to ensure that the proposal does not adversely affect the function, appearance or accessibility of the wider Marine Gardens. It will instead enhance Marine Gardens as a destination in its own right, with associated tourism, cultural and economic benefits for Bangor.

5. Legislative & Planning Policy Context

- 5.1 This section provides an outline of the planning policies relevant in the assessment of the proposed development.

Planning Legislation

- 5.2 Section 6(4) of the Planning Act (Northern Ireland) 2011 (the Act) sets out the following requirement:

‘Where, in making any determination under this Act, regard is to be had to the local development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise’

- 5.3 Similarly, Section 45(1) of the Act states that when determining a planning application, the Council ‘...must have regard to the local development plan, so far as material to the application, and to any other material considerations.’
- 5.4 The relevant policy considerations are detailed below.

Regional Policy

Strategic Planning Policy Statement for Northern Ireland (2025)

- 5.5 The provisions of the SPPS apply throughout Northern Ireland and are material to the determination of individual planning applications. Furthering sustainable development is the cornerstone of the SPPS. It states that planning authorities should deliver across the three pillars of sustainable development — economic, social and environmental — when determining planning applications.
- 5.6 Under the SPPS, the guiding principle is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposal would cause demonstrable harm to interests of acknowledged importance.
- 5.7 Paragraph 1.8 of the SPPS states that a transitional period will operate until a Plan Strategy for the whole council area has been adopted. During this period, planning authorities will continue to apply the existing planning policies contained within the suite of Planning Policy Statements, together with the relevant subject policies of the SPPS.
- 5.8 Importantly, should any conflict arise between the SPPS, and any policy retained under the transitional arrangements, the conflict must be resolved in favour of the policy provisions in the SPPS. It is our assessment that the policy provisions set out in the SPPS are broadly consistent with those within the suite of retained Planning Policy Statements. When a Council adopts its Plan Strategy, the retained policies operating under the transitional arrangements will cease to have effect in that district from that date and will no longer be material, whether a planning application was received before or after adoption (paragraph 1.9 of the SPPS).

Planning Policy Statements

5.9 The following retained Planning Policy Statements are of particular relevance:

- PPS 2 Natural Heritage
 - **Policy NH 5** - Habitats, Species or Features of Natural Heritage Importance
- PPS 3 Access, Movement and Parking
 - **Policy AMP 1** – Creating an Accessible Environment;
 - **Policy AMP 2** – Access to Public Roads;
 - **Policy AMP 6** – Transport Assessment;
 - **Policy AMP 7** – Car Parking and Servicing Arrangements;
 - **Policy AMP 8** – Cycle Provision;
 - **Policy AMP 9** – Design of Car Parking; and
 - **Policy AMP 10** - Provision of Public and Private Car Parks.
- PPS 4 Archaeology and Built Heritage
 - **Policy BH 11** – Development affecting the Setting of a Listed Building
- PPS 8 Open Space, Sport and Outdoor Recreation
 - **Policy OS 1** – Protection of Open Space.
- PPS 15 Planning and Flood Risk (revised)
 - **Policy FLD 1** - Development in Fluvial and Coastal Flood Plains;
 - **Policy FLD 3** – Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains; and
 - **Policy FLD 5**- Development in Proximity to Reservoirs.
- PPS16 Tourism
 - **Policy TSM1**- Tourism Developments in Settlements: and
 - **Policy TSM 7**- Criteria for Tourism Development.

Local Policy

North Down and Ards Area Plan (NDAAP) 1984-1995

5.10 Ards & North Down Borough Council does not have a published or adopted Local Policies Plan. As such, the NDAAP is the local development plan for the area for the purposes of the Planning Act (NI) 2011.

- 5.11 Within the NDAAP the site is located adjacent to the Town Centre on an area of 'white land', unzoned for any particular development.

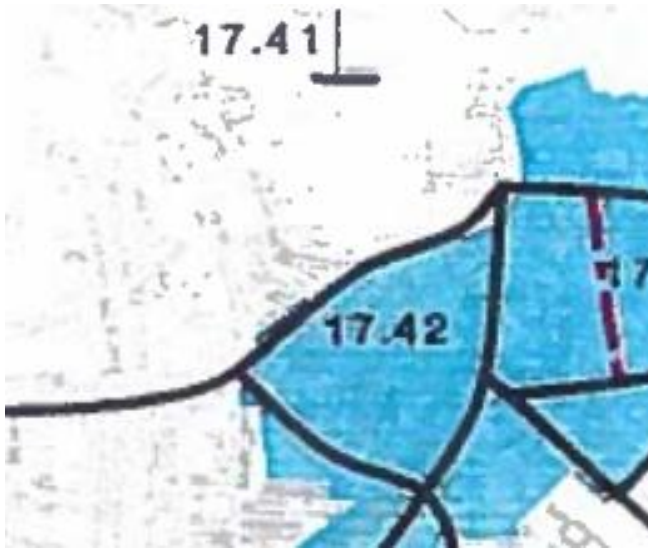


Figure 5.1: Extract from Map no. 5- Bangor (NDAAP)

Draft Belfast Metropolitan Area Plan (dBMAP) 2015

- 5.12 The dBMAP remains a material consideration within the Ards and North Down Borough Council area.
- 5.13 Under the provisions of the dBMAP the application site is located adjacent to the town centre boundary and is located within an Area of Existing Open Space.



Figure 5.2: Extract from Map No. 3a- Bangor (dBMAP)

- 5.14 For the purposes of this planning application therefore, the site is considered to be existing open space.

Emerging Local Development Plan

- 5.15 In early 2026, the Council consulted on its draft Plan Strategy (dPS), including draft operational planning policies. Insofar as they correspond to the PPS policies listed above, the dPS does not introduce significant changes in policy themes or content. As the LDP is at an early stage and remains subject to Independent Examination, it does not carry material weight in the assessment of this proposal.

6. Planning Assessment

- 6.1 This section assesses the proposal against the planning policy framework set out in Section 5. The principal issue is whether the limited loss of existing open space is decisively outweighed by the accessibility, regeneration, tourism and community benefits arising from the destination play facility and its supporting infrastructure.

Principle of Development

- 6.2 The site lies on white land within the settlement limit and, in part, already benefits from extant permissions for public realm works and a play facility. The principle of development is therefore established. The central question for this application is whether the proposed parking, as an intrinsic part of an inclusive destination play facility, justifies the limited loss of open space under Policy OS 1.

- 6.3 These matters are addressed below.

Play facility

- 6.4 PPS 16 Policy TSM 1 states that planning permission will be granted for a proposal for tourism development, including a tourist amenity such as the proposed play destination, within a settlement, provided it is of a nature appropriate to the settlement, respects the site context in terms of scale, size and design, and has regard to the specified provisions of the development plan. SPPS paragraphs 6.272 and 6.273 set out the strategic policy approach and are aligned with the PPS, albeit the PPS policies provide further detail and criteria.
- 6.5 PPS 16 recognises that tourism development can support existing services and facilities, including retail, catering, entertainment, leisure and transport, while also promoting urban vitality. It further notes that, in specific locations, tourism can provide a focus for regeneration schemes or form a key component of mixed-use development.
- 6.6 That is the case here. The proposed play facilities will create a destination attraction for families within Bangor and across the wider region, reinforcing the role of Marine Gardens and the Queen's Parade regeneration in increasing footfall, supporting vitality and strengthening Bangor's visitor offer.
- 6.7 The play facility is therefore a significant positive material consideration in the overall planning balance.
- 6.8 The relevant criteria of TSM 7 are addressed below:
- (a) a movement pattern is provided that, insofar as possible, supports walking and cycling, meets the needs of people whose mobility is impaired, respects existing public rights of way and provides adequate and convenient access to public transport*
- 6.9 The proposed play facility will integrate seamlessly with the wider Marine Gardens through ease of access from the promenade and the footpath to the south. The proposal must be considered within the context of the wider regeneration scheme.

Cycle parking facilities will be provided within Marine Gardens, and the replacement of the previous c.200 car parking spaces with high-quality public realm will enhance the pedestrian experience by helping to provide a permeable link between the city and the marina. The proposed car parking will not impede that permeability and is designed to cater for the needs of families and those with reduced mobility who wish to use the play facility and access the wider area.

- 6.10 It is expected that the majority of visitors to the play facility, as with the wider Marine Gardens, will arrive on foot or by wheelchair or buggy. Accordingly, the hard landscaped areas have been designed to be level, with ramped access where necessary, to ensure ease of movement for all users, including wheelchair users and parents or guardians with buggies.

(b) the site layout, building design, associated infrastructure and landscaping arrangements (including flood lighting) are of high quality in accordance with the Department's published guidance and assist the promotion of sustainability and biodiversity

- 6.11 The play park, surrounding landscaping and car parking have been designed to a high standard to complement the wider Marine Gardens. The use of the same material palette for areas of hardstanding (exposed aggregate concrete, granite, self-binding surfacing etc.) will ensure a high-quality, consistent appearance. The play equipment itself is of a high-quality specification and represents an investment of more than £1.25 million in a destination facility.

- 6.12 Soft landscaping and the planting of over 50 trees in this area will further enhance the quality of the proposal and improve biodiversity.

(c) appropriate boundary treatment and means of enclosure are provided and any areas of outside storage proposed are screened from public view

- 6.13 Hedging, trees and shrub planting will surround the car parking area and provide a visual buffer to both Queen's Parade and the play facility. The play facility itself will be secured via these natural boundary treatments in addition to a 1.1 metre high mesh fence.

(d) utilisation of sustainable drainage systems where feasible and practicable to ensure that surface water run-off is managed in a sustainable way

- 6.14 This criterion is addressed under 'Flood Risk and Drainage'.

(e) is designed to deter crime and promote personal safety

- 6.15 The play facility and car park area will benefit from lighting similar to that proposed for the wider Marine Gardens public realm, which will promote safety and help deter crime and antisocial behaviour during hours of darkness. The lighting will be designed to avoid light spill into surrounding residential areas.

- 6.16 During the day, 1.1 metre mesh net fencing will provide security for children using the play facilities.

(f) development involving public art, where it is linked to a tourism development, needs to be of high quality, to complement the design of associated buildings and to respect the surrounding site context

- 6.17 Criterion (f) is not relevant to this proposal.

(g) it is compatible with surrounding land uses and neither the use or built form will detract from the landscape quality and character of the surrounding area

- 6.18 This proposal forms part of the wider development. The project as a whole provides a significant enhancement to the built environment of this part of Bangor, unlocking the overall Queen's Parade regeneration which will positively transform the city. The use of a high-quality palette of materials for the proposed pavilion buildings and hardstanding areas, together with carefully selected native planting, will enhance the landscape quality and character of the surrounding area.

- 6.19 For the small car park area proposed, native hedging, trees and shrubs will provide a visual buffer between the parking spaces, the rest of Marine Gardens, the properties to the south along Queen's Parade and the promenade to the north. The sympathetic layout and design of the parking will retain 7 of the existing trees along the southern boundary and will offset the loss of non-native planting within the existing area of open space through new native planting, including 51 new trees, most of which will be heavy standard trees.

- 6.20 Discounting trees already scheduled to be removed under the extant planning permissions, only 7 trees will be removed. The proposal represents a significant net increase in the number of trees on the site.

- 6.21 Cross-section drawings are enclosed which show the relationship between this proposal and the wider built environment.

(h) it does not harm the amenities of nearby residents

- 6.22 This criterion is assessed under 'Residential Amenity' below.

(i) it does not adversely affect features of the natural or built heritage

- 6.23 This criterion is addressed under 'Natural Environment' and 'Built Heritage' below.

(j) it is capable of dealing with any emission or effluent in accordance with legislative requirements. The safeguarding of water quality through adequate means of sewage disposal is of particular importance and accordingly mains sewerage and water supply services must be utilised where available and practicable

- 6.24 The proposal will connect to the wider Marine Gardens drainage network to ensure that surface water runoff is managed through controlled discharge to the marina in accordance with the approved arrangements. Any foul drainage will arise only from the pavilion building, which already benefits from extant planning permission and an agreed connection to the foul sewer.

(k) access arrangements must be in accordance with the Department's published guidance

(l) access to the public road will not prejudice road safety or significantly inconvenience the flow of traffic

(m) the existing road network can safely handle any extra vehicular traffic the proposal will generate

6.25 These criteria are addressed under 'Access and Traffic' below.

6.26 The proposed development accords with all relevant criteria in Policy TSM 7.

Parking Need

6.27 The Queen's Parade redevelopment established a transport and placemaking strategy that intentionally reduced on-site car parking. At the time of the initial grant of planning permission, it was accepted that existing public car parking could be removed, given the wider availability of public car parks elsewhere across Bangor, particularly around the town centre, marina area and seafront.

6.28 Phase 1 of Queen's Parade, comprising the new public realm, is now under construction. The former public surface-level car parks have been removed, with these areas now being transformed into civic spaces, pedestrian zones and enhanced seafront landscaping. This reduces the supply of short-stay parking for visitors to the marina, promenade and families accessing local attractions.

Accessibility and Demographics

6.29 Since the original 2019 planning permission, material circumstances have changed such that accessible short-stay parking is now required alongside the proposed playpark at the western end of Marine Gardens.

6.30 The Borough population has grown by approximately 4,500 residents since 2019². More significantly, Census 2021 recorded 41,300 Borough residents with a limiting long-term health problem or disability — an increase of 31.4% compared to Census 2011, representing one of the highest increases across all 11 councils in Northern Ireland³.

6.31 Ards & North Down has the oldest population profile in Northern Ireland, with 23% of residents aged 65 and over and a median age of 45.2 years — significantly higher than the Northern Ireland average⁴. Census 2021 data shows that 34.6% of residents aged 65 and over have mobility difficulties⁵. The Borough also has the highest proportion of residents providing unpaid care in Northern Ireland (13.7%).

² NISRA Mid-Year Estimates

³ NISRA Census 2021 Phase 2

⁴ NISRA 2023 Mid-Year Estimates

⁵ NISRA Census 2021, Tables MS-D07/D08)

- 6.32 There are currently 132,833 valid Blue Badge holders in Northern Ireland, of whom over 60% are aged 64 and over⁶.
- 6.33 Among children aged 0–14, 7.9% have a limiting long-term health condition — nearly one child in twelve⁷. These conditions include autism spectrum disorder, mobility impairments, sensory disabilities, and complex health needs. Many of these families require vehicles with specific adaptations and close proximity parking.
- 6.34 The Big Plan for Ards and North Down, the Council’s Community Plan, commits to improving the accessibility of public services, creating welcoming and accessible spaces, and ensuring that all residents benefit from good health, wellbeing and a valued environment. Section 75 of the Northern Ireland Act 1998 places a statutory obligation on public authorities to promote equality of opportunity, with due regard to disability and age.
- 6.35 The proposed playpark has been designed with inclusivity at its core. An independent professional assessment by AccessibleUK confirms that the design meets, and in several respects exceeds, inclusive design requirements. The design aligns with the PiPA Framework (Plan Inclusive Play Areas), endorsed by the UK Government’s Accessible Britain Challenge and recognised as best practice by the British Design Council. A minimum of 30% of the play experience will provide meaningful inclusive engagement.
- 6.36 However, AccessibleUK’s own professional framework identifies three preconditions for genuinely accessible play:
- Can you get there?
 - Can you stay there?
 - Can you play there?
- 6.37 Without accessible parking provision, the first and most fundamental question cannot be answered. Independent visitor capacity analysis by the appointed playpark supplier confirms that the facility will generate between 100-200,000 visits per annum and strongly recommends changing places provision for families with complex care needs. Both the supplier and the accessibility consultant confirm that accessible infrastructure, including parking and changing places facilities, is essential to the facility’s inclusive purpose.
- 6.38 The main planning permission appropriately removed surface parking to create pedestrian-focused public realm. This application responds to changed circumstances by providing essential short-stay parking at the western end of Marine Gardens for users who cannot reasonably access the waterfront from more distant car parks, including wheelchair users, Blue Badge holders, families with young children and older

⁶ Department for Infrastructure, December 2023

⁷ NISRA Census 2021 Phase 2

visitors. This is a proportionate response that enables the public investment in the playpark and waterfront regeneration to be enjoyed more fully and more equitably.

Tourism

- 6.39 The extant planning permission established a public realm strategy that was appropriate for the scheme as it was originally proposed. Since that consent was granted, the design for the Marine Gardens (Queen's Parade Phase 1) has been substantially enhanced through the addition of a world-class destination playpark, funded by £9.8 million of UK Government Levelling Up Fund (LUF) investment.
- 6.40 Northern Ireland's visitor economy generates approximately £1.8 billion annually, including £703 million from 10 million same-day visits⁸. New NISRA data indicates that 80% of same-day visits are made by NI residents travelling by car, with an average expenditure of £70.50 per visit. This day trip data was not available at the time of the original grant of the main planning permission and represents a material change in the evidence base for assessing visitor access requirements at destination attractions.
- 6.41 Bangor is Northern Ireland's largest coastal city, granted city status in 2022, and home to the country's largest yacht marina with 5 Gold Anchor accreditation. The city's waterfront already attracts significant visitor numbers: Pickie Fun Park is recognised by Tourism NI as one of Northern Ireland's top visitor attractions; the Open House Festival has attracted a combined audience of 362,000 since 2013, generating an estimated £13.6 million in economic impact. The Belfast Region City Deal, representing total investment of up to £850 million, projects 100,000 new visitors per year to Bangor and the Ards and North Down council area. The Queen's Parade regeneration is a flagship project within this programme.
- 6.42 The enhanced destination playpark will be the first facility of this kind and scale on the island of Ireland: an inclusive playpark within a 5-acre waterfront park, designed to internationally recognised standards and serving a regional catchment of over 600,000 people within a 30-minute drive. There is no comparable facility in Northern Ireland. The appointed playpark supplier, Unipark, projects 100-200,000 visits per annum, with peak summer days of 1,000–1,250 visits and circa 220 vehicle movements during high-activity periods. These projections are supported by published visitor data from comparable UK destination playparks, including Lilidorei at Alnwick Garden and Wicksteed Park, Kettering.
- 6.43 Review of comparable visitor attractions across Northern Ireland and the UK confirms that dedicated car parking is provided as standard infrastructure at every facility, regardless of scale. In Northern Ireland, Hillsborough Forest Park required 145 car parking spaces (doubled from original capacity during a £4.26 million redevelopment) and still needs overflow parking at peak times.
- 6.44 This pattern is replicated across comparable UK coastal towns. Scarborough, North Yorkshire – a seaside resort of similar population to Bangor (61,000 vs 64,596) and ranked by VisitBritain as England's second most popular holiday destination – provides 300 car parking spaces at a single waterfront attraction and retains dedicated parking

⁸ NISRA Annual Tourism Statistics 2024

at every seafront facility. Whitley Bay's £64 million seafront regeneration, which explicitly prioritised sustainable and active transport, nonetheless retained visitor car parks as essential infrastructure. No comparable UK waterfront regeneration has been delivered without visitor parking provision.

- 6.45 The enhanced scheme now being delivered, with a destination playpark operating at a regional scale, will generate visitor demand beyond that contemplated when the earlier public realm strategy was approved. Providing managed short-stay parking at the western end of Marine Gardens is therefore a proportionate infrastructure response which supports accessibility, visitor function and the wider economic and community benefits of the regeneration project.

Summary

- 6.46 The proposal responds to reduced short-stay parking supply along the seafront and supports access to the upgraded Marine Gardens and existing attractions, particularly for families with young children, older visitors and people with mobility impairments.
- 6.47 Visitor parking is now dispersed across Bangor's public car parks, increasing walking distance for some users. In this context, the proposed short-stay, managed provision supports accessibility without undermining the pedestrian-focused intent of the earlier approval.
- 6.48 The proposed short-stay parking is necessary to make the play facility function effectively as part of the wider Marine Gardens offer. In turn, it helps unlock the social, accessibility and economic benefits associated with the destination play facility and Phase 1 regeneration works.
- 6.49 Sections 6.6 and 6.7 of the Transport Assessment detail likely demand and the justification for the specific quantum of car parking proposed.

Loss of Open Space

- 6.50 PPS 8 Policy OS 1 (and SPPS paragraph 6.205) carries a presumption against development which would result in the loss of open space. Both PSS 8 and the SPPS provide an exception to this, where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh that loss. In this case, that exception is met.
- 6.51 As outlined above, the proposal will deliver substantial community benefits, including:
1. *Unlocking delivery.* Enabling completion of the wider Marine Gardens redevelopment and subsequent phases of the Queen's Parade regeneration, including a significant net increase in public open space.
 2. *Destination play facility.* Providing enhanced amenity and inclusive play opportunities in Bangor.
 3. *Support for local businesses.* Increasing visitor numbers, dwell time and potential expenditure within Bangor.
 4. *Inclusivity.* Providing high-quality parking and access arrangements for young families, disabled users and others with mobility needs.

- 6.52 This proposal also forms part of the wider Marine Gardens redevelopment, Phase 1 of the Queen's Parade masterplan for this part of Bangor city. Although construction has commenced, these revisions are necessary to ensure the enhanced scheme functions effectively and can realise its intended public benefits.
- 6.53 The community benefits of the wider redevelopment are intrinsically linked to this proposal, particularly through Phase 1, including enhanced permeability between the town centre and the marina, visual improvements, and opportunities for cultural and social events. More fundamentally, Phase 1 will provide a net 2 hectares of high-quality public open space, inclusive of the current proposal.

Summary of Principle

- 6.54 Having regard to Policy TSM 7 and the wider Marine Gardens context, the proposal delivers significant economic and community benefits and supports completion of the regeneration scheme. While some existing open space would be lost, the wider project will still provide an overall net increase of approximately 8,000 square metres of enhanced public open space.
- 6.55 Native planting will be introduced in place of the current non-native species, which when established, will contribute to what will be a high-quality environment for residents and visitors to Bangor.
- 6.56 The community benefits of the proposed play facility are substantial. The associated parking is modest in scale, but essential to accessibility and to fully realising those benefits. It is therefore an intrinsic and justified part of the proposal.
- 6.57 For these reasons, the Policy OS 1 exception is met and the proposal is acceptable in principle.

Access and Traffic

Accessibility

- 6.58 The proposed play park, surrounding landscaped areas, pavilion building and car parking have all been designed with accessibility at the forefront. Level access between the promenade, Marine Gardens and the surrounding footpath network will be provided, and pedestrian permeability retained. In this regard, the proposal accords with Policy AMP 1.
- 6.59 There are numerous crossing points within 800m of the site, primarily located to the south and east of the site. Many of these crossing points are at signalised junctions.
- 6.60 There are two bus stops within the 400m walking catchment of the development, a further 10 are available within 800m. Bangor Bus and Rail Centre is within 600m of the development, which provides connections to Belfast Grand Central and onwards.
- 6.61 AMP7 states that:

"Development proposals will be required to provide adequate provision for car parking and appropriate servicing arrangements. The precise amount of car parking will be

determined according to the specific characteristics of the development and its location having regard to the Department's published standards or any reduction provided for in an area of parking restraint designated in a development plan. Proposals should not prejudice road safety or significantly inconvenience the flow of traffic."

- 6.62 There are no specific parking standards for play parks and wider public open space facilities such as the new Marine Gardens. As such, the provision of 81 spaces has been informed by traffic modelling and predicted visitor numbers of approximately 100-200,000 annually, drawing on a review of comparable play facilities elsewhere. A short-duration absolute peak is forecast to occur between 2:00pm and 3:00pm on a Sunday afternoon, during which parking accumulation may temporarily rise to approximately 76 occupied spaces. Operationally, this is treated as full capacity so that some spaces remain available for circulation. Capacity will be managed through signage visible to drivers before entering Queen's Parade, with the detail to be agreed through condition if required.
- 6.63 The policy further states that a proportion of the spaces provided should be reserved for people with disabilities. Eight disabled parking spaces are proposed, representing approximately 10% of the total.
- 6.64 Twenty-three spaces are 2.6m x 4.8m and are intended for family use, wider than the standard 2.4m x 4.8m spaces. Four electric vehicle charging spaces are also proposed.
- 6.65 Cycle provision will be retained within the wider Marine Gardens – both within the eastern and western parts of the new public realm, as approved.

Transport Assessment

- 6.66 In accordance with Policy AMP 6, a Transport Assessment (TA) by Atkins Realis has been submitted in support of the proposal.
- 6.67 The TA, informed by detailed modelling, confirms that the quantum of proposed parking and the level of predicted trips arising will ensure that the surrounding junctions continue to operate within capacity. Access from the roundabout to the south will remain as existing, and the internal road into the car park has been designed to aid the flow of vehicles accessing the car park, avoiding congestion on the surrounding network.
- 6.68 In this respect, the proposal accords with Policy AMP 2.

Car Park Design

- 6.69 Policy AMP 9 requires car parking to be designed, arranged and landscaped to a high standard, in a manner which respects the character of the local townscape, does not adversely affect local amenity, and provides for safety and the access needs of pedestrians and cyclists.
- 6.70 The latter has been addressed above, and the car park is well designed to integrate with the wider public realm in this part of Bangor. As noted above, the proposed landscaping, including tree planting and high-quality surfacing, will ensure design

integration with the world-class public realm at Marine Gardens and the wider area. Landscaped pockets will break up the rows of parking, and a planted buffer comprising the retained stone wall, existing trees and new trees will partially screen the car park from the residential area to the south. Considered in the round with the wider Queen's Parade redevelopment, this proposal forms a small part of a development that will provide a significant enhancement to the townscape compared with the pre-existing baseline.

6.71 AMP10 relates to the provision of public car parking and sets out the following criteria:

- they do not significantly contribute to an increase in congestion;
- are not detrimental to local environmental quality;
- they meet a need identified by the Department for Regional Development in Transport Plans or accepted by DRD following robust analysis provided by a developer ;
- within defined areas of parking restraint they are only used for short-stay parking and are appropriately managed to deter long stay commuter parking; and

6.72 they are compatible with adjoining land uses.

6.73 Congestion is addressed within the TA and summarised above. In summary, the predicted peak traffic will not exceed junction capacity in the area.

6.74 The provision of high-quality new planting of native tree species will offset the loss of non-native planting and maintained grass to be removed. An ecology survey has been undertaken by a qualified ecologist and the site is not of high biodiversity value. Taken within the wider context of this part of Bangor, the proposed car park will not be detrimental to local environmental quality.

6.75 A robust need case has been set out within this statement, and in the TA, for the parking proposed. The car park directly serves and is linked to the wider Marine Gardens and is compatible with adjoining land uses as a result.

Flood Risk and Drainage

6.76 A small section of the eastern part of the site lies within the coastal flood plain. This part of the site overlaps with the extant 'main' planning permission for Queen's Parade, where an exception to Policy FLD 1 was agreed by the Council when granting planning permission. No new uses are proposed within this area.

6.77 In accordance with Policy FLD3, the drainage network for the wider Marine Gardens site will be extended to facilitate surface water drainage for the car park and play facility. An updated drainage assessment and drainage drawings for the overall Marine Gardens is submitted in support of this application. The drainage assessment confirms that the site will discharge into the Cladeboye Stream and then into the Marina via the approved outfall. No expansion to this outfall is required.

- 6.78 Policy FLD 5 was addressed in detail in relation to the main planning permission and discussed within the case officer's report for LA06/2020/0097/F. Inundation risk arising from any failure of the Clondeboy Lake reservoir, 2.6 kilometres from the site, was identified as a concern by DfI Rivers when assessing that application. As noted in the case officer's report, paragraph 6.61 of PPS 15 refers to a presumption against development rather than an outright ban or moratorium. As accepted by the Planning Appeals Commission in appeal decision 2018/A0098, the use of the word 'presumption' is not absolute and allows for cases where approval may still be justified. Any such inundation would in any event affect a large proportion of Bangor, rather than only part of the application site.
- 6.79 The proposal forms a small part of the wider Queen's Parade development, which already benefits from planning permission, with the additional area comprising car parking and landscaping in place of existing landscaping and public footpaths. Given that an exception to this policy position has already been accepted, it is considered that the presumption against development within the inundation area does not directly preclude this proposal and that the FLD 5 issue has been sufficiently addressed through the earlier consent.

Natural Environment

- 6.80 A Biodiversity Checklist and Preliminary Ecological Assessment have been completed and submitted with the application. They conclude that the ecological value of the existing non-native planting is moderate and that any effects should be mitigated by carrying out felling works outside the nesting season and by planting native trees and/or hedgerow species to offset any adverse impacts. This approach has informed the proposals.
- 6.81 A Tree Survey has also been undertaken. While the proposal would result in the loss of trees and some ornamental planting, none of that loss would adversely affect, or comprise, priority habitats or species.
- 6.82 PPS 2 Policy NH 5 states that a development proposal likely to result in an unacceptable adverse impact on, or damage to, habitats, species or features may only be permitted where the benefits of the proposed development outweigh the value of the habitat, species or feature. No such unacceptable adverse impact will arise here. In any event, the proposal provides benefits which outweigh the limited loss identified, as set out in this statement.

Built Heritage

- 6.83 The terraced dwellings (Nos. 47–63 (odds)) along Queen's Parade to the south are B2 listed and date from the late 19th century. At the closest point, the terraces are 15 metres from the southern boundary of the application site. The distance between the front elevation of the closest dwelling (No. 55) and the proposed car park will be approximately 25 metres. Elsewhere, that distance will increase to around 40 metres. The proposed play facilities will be more than 40 metres from the closest listed building.

6.84 The buildings are prominent three-storey terraces with larger bay window features typical of late Victorian seaside properties. They sit higher than the proposed car park by approximately 3–4 metres. Each dwelling features a landscaped front garden which slopes down to the north, with surface parking and then the public road between the property and the application site.

6.85 Policy BH 11 sets out a number of criteria which must be met in relation to the setting of listed buildings:

(a) the detailed design respects the listed building in terms of scale, height, massing and alignment

6.86 The proposal will not significantly exceed the 8.59 metre height of the extant approved play park or exceed the approved pavilion height parameter of 6.5 metres respectively, and these structures will be located well in excess of 100 metres from the front elevation of the closest dwelling on Queen's Parade. Criterion (a) is therefore met.

(b) the works proposed make use of traditional or sympathetic building materials and techniques which respect those found on the building

6.87 It is considered that the proposed pavilion building design is appropriate to the context of Marine Gardens and should draw its design influence from its wider setting, namely the city and the marina. The building has been designed to have a low visual impact so as not to detract from the setting of the existing buildings behind, or the future larger buildings to be developed in the later phases of the Queen's Parade redevelopment.

(c) the nature of the use proposed respects the character of the setting of the building.

6.88 The impact of the proposal on the setting of these listed buildings has been carefully considered. The pavilion building and a smaller play facility have already been accepted and benefit from extant planning permission. The key visual change brought about by this proposal will be the loss of some landscaped and planted areas, and some trees, to enable the provision of car parking. Having regard to the notable separation distances, the existing street parking and public road along Queen's Parade, and the wider changes underway at Marine Gardens, the proposal will alter the setting of the listed buildings from some public vantage points, mainly when viewed from the promenade to the north.

6.89 However, the buildings are well elevated above the application site and benefit from front garden areas which positively frame them. In the context of the wider redevelopment, the proposal will not have an unacceptable adverse effect on their setting.

6.90 Having regard to the policy criteria, the proposal accords with Policy BH 11.

Residential Amenity

6.91 The closest residences to the application site are the properties along Queen's Parade to the south. The front elevations of those properties are between approximately 20 and 40 metres from the southern site boundary, and no less than 25 metres from the

proposed car parking area. The Queen's Parade dwellings sit well above the site and the proposed play facilities, pavilion and car park.

- 6.92 The principle of a play facility in this location has been accepted via the extant planning permission⁹. The proposed facility will be larger in scale and expected to generate greater visitor numbers. Nevertheless, the proposal is within an existing area of public open space. Activity and noise from the play facility will be limited to the daytime/light hours.
- 6.93 The same access point from Queen's Parade will be used. With the increasing proportion of electric vehicles, any associated noise is likely to reduce over time. Importantly, Queen's Parade runs between the site and the closest dwellings.
- 6.94 The proposal will not result in any unacceptable loss of privacy, having regard to the separation distances and relative levels described above. Similarly, it will not result in any unacceptable loss of light or outlook for properties on Queen's Parade. There will be a change in views across the marina from the south; however, loss of view is not a material planning consideration, and the proposed planting and landscaping will establish over time. Once established, the overall Marine Gardens area will provide an improved setting for this part of Bangor.

⁹ LA06/2024/0572/F

7. Conclusion and Planning Balance

- 7.1 The proposal forms an important part of the revised approach to Marine Gardens, comprising the first phase of the wider Queen's Parade redevelopment. The proposed play facility has the potential to operate as a destination in its own right, supporting visitor numbers to Bangor and enhancing the leisure offer for residents.
- 7.2 To realise that potential, a modest level of supporting car parking is proposed, targeted in particular at families with children, disabled users and others with reduced mobility. This is the key enabling infrastructure that allows the play facility to operate inclusively and effectively.

Summary of Impacts

Negative Impacts

- 7.3 The principal policy issue is compliance with Policy OS 1. Some existing open space will be lost; however, that effect must be considered in the context of the wider project, which will deliver a net increase of approximately 8,000 square metres of open space.

Neutral Impacts

- 7.4 There will be no adverse impact on residential amenity, noting that loss of, or impact on, views is not a material planning consideration, and no material impact on the setting or significance of the Queen's Parade terrace to the south due to the separation distance, relative levels, and retained and proposed planting.
- 7.5 The Transport Assessment confirms that there will be no adverse impacts in terms of highway safety and the capacity of the road network.
- 7.6 The ecology work undertaken confirms that no protected species are likely to be impacted by the development and that the site does not have a high biodiversity value.
- 7.7 Surface water drainage will connect with the wider drainage network for Marine Gardens and there will be no increase in flood risk arising from the proposal.

Positive Impacts

- 7.8 The proposal gives rise to clear and substantial community benefits sufficient to satisfy the Policy OS 1 exception. These are set out in Section 6 and are not repeated here.
- 7.9 Significant new native tree planting is proposed, which when established, will provide a strong natural screen and complement the wider setting of this part of Bangor, offsetting the loss of existing non-native planting.

Conclusion

- 7.10 The proposal is acceptable in technical terms and satisfies the relevant policies relating to transport, flood risk, the natural environment, built heritage and residential amenity.
- 7.11 The benefits of the proposal decisively outweigh the limited loss of existing open space. Read in the context of the wider Marine Gardens and Queen's Parade regeneration, the proposal satisfies the Policy OS 1 exception, accords with the relevant planning policy framework, and should be approved.

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