

— View selected questions



Seamus

Fay

**MAIN QUESTION**

**Name:**

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+ ADD TO ANALYSIS

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+ ADD TO ANALYSIS

**Are you responding on behalf of an organisation?**

Yes

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+ ADD TO ANALYSIS

**Organisation and Job Title (if applicable):**

Kircubbin Development Lands

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+ ADD TO ANALYSIS

**Are you an Agent responding on behalf of a client?**

Yes

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+ ADD TO ANALYSIS

**Client Name , address (if applicable):**

No answer

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+ ADD TO ANALYSIS

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+ ADD TO ANALYSIS

Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Oral Hearing (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.



+ ADD TO ANALYSIS

### Soundness of the Plan

No 

+ ADD TO ANALYSIS

**If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below.**

See attached report

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

## Test P1 Comments

No answer

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+ ADD TO ANALYSIS

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+ ADD TO ANALYSIS

## Test P2 Comments

No answer

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+ ADD TO ANALYSIS

## Test P3 Comments

No answer

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+ ADD TO ANALYSIS

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## Test P4 Comments

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+ ADD TO ANALYSIS

### Consistency Tests

No

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+ ADD TO ANALYSIS

### Test C1 Comments

See attached report

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test C2 Comments

No answer

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+ ADD TO ANALYSIS

### C3 Did the Council take account of policy and guidance issued by the Department?

No

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+ ADD TO ANALYSIS

### Test C3 Comments

See attached report

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test C4 Comments

No answer

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+ ADD TO ANALYSIS

### Coherence and Effectiveness Tests

No 

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+ ADD TO ANALYSIS

### Test CE 1 Comments

See attached report

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+ ADD TO ANALYSIS

**CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**

No

+ ADD TO ANALYSIS

**Test CE 2 Comments**

see attached report

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

**Test CE 3 Comments**

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

**Test CE 4 Comments**

No answer

+ ADD TO ANALYSIS

**If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound.**

No answer

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+ ADD TO ANALYSIS

**Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy?**

No answer

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+ ADD TO ANALYSIS

**Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)**

No answer

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+ ADD TO ANALYSIS

**draft Habitats Regulations Assessment(HRA)**

No answer

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

## Equality Impact Screening Report

No answer

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+ ADD TO ANALYSIS

## Rural Needs Impact Assessment

No answer

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+ ADD TO ANALYSIS

## Please add any additional comments

No answer

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Example tag 1 +

Example tag 2 +

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# **ARDS & NORTH DOWN LOCAL DEVELOPMENT PLAN 2032**

**Representations to Draft Plan Strategy**

**Lands adjacent Parsonage Road, Kircubbin**



Kircubbin  
LDP Reps  
Final  
March 2026

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### APPENDICES

Appendix 1: Subject Lands

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## **1. INTRODUCTION**

- 1.1 This representation has been prepared by Fay Planning Consultancy on behalf of our clients, in response to the consultation in respect of the Ards & North Down Borough Council (*'the Council'*) Local Development Plan 2032 Draft Plan Strategy (*'DPS'*) issued for formal consultation on 17<sup>th</sup> October 2025.
- 1.2 This representation relates to the growth strategy, the proposed settlement hierarchy, and the distribution of housing land within that hierarchy.
- 1.3 It relates to land that is not currently zoned under the North Down & Ards Area Plan 1984-1995 (see Appendix 1) and responds to the relevant strategy and policy considerations set out in the DPS with particular regard to the site-specific interests.
- 1.4 The consideration of the Council proposals and the preparation of this response to that proposal has taken account of relevant background documents that are material to the consideration of this matter.
- 1.5 For the reasons set out below, it our considered view that the DPS is unsound as the it fails the soundness tests in respect of:
  - Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
  - Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
  - Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
  - Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

## 2.0 THE PLAN PERIOD

- 2.1 While the Planning Act (NI) 2011 (*'The Act'*) does not set out a prescribed period that the plan should cover, the SPPS does require (paragraph 5.7) that LDPs should set out a long-term spatial strategy. Further, paragraph 2.6 of Development Plan Practice Note 1: Introduction: Context for Local Development Plans (DPPN 1) directs that, among other functions, the LDP should:
- *provide a 15-year plan framework to support the economic and social needs of a council's district in line with regional strategies and policies, while providing for the delivery of sustainable development;*
  - *facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the well-being of the community; • allocate sufficient land to meet society's needs;*
  - *provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place;*
  - *provide a plan-led framework for rational and consistent decision-making by the public, private and community sectors and those affected by development proposals; and*
  - *deliver the spatial aspects of a council's current community plan:*
- 2.2 The purpose of the LDP therefore is to provide a forward planning framework to direct sustainable growth in the Council area in the years ahead. The National Planning Policy Framework 2025 in England, at paragraph 22, states that:
- "Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."* (emphasis added).
- 2.3 That has led to the Planning Inspectorate in the UK engaging directly with local councils in relation to the LDP timetable to ensure that strategic policies do look ahead for a minimum 15 year period from adoption including the Wiltshire Local Plan as a recent example where discussions between the Inspectorate and the local council are considering what level of extension of the plan period will be required to ensure compliance with national policy and effective due to a delay in the plan process.
- 2.4 That general approach has been followed in Belfast where the Plan Strategy adopted in May 2023 which will guide future investment and development decisions to enable the sustainable spatial growth of the city up to 2035. The DPS for Ards & North Down Borough should be consistent with that approach.
- 2.5 The DPS documents state that the purpose of the Ards and North Down Borough Local Development Plan is to inform the general public, statutory authorities, developers and other interested parties of the policy framework and land use proposals that will guide development decisions within the Borough for a 15-year time frame. However, we are now 8 years into the LDP process and are only at the DPS stage and, going by past experience of other LDP processes the process is unlikely to be completed until near the stated end date of the LDP. That is an unsustainable approach to plan making and is contrary to the overall objective of providing a forward planning framework on which to base development management decisions going forward.

## **LDP Submission**

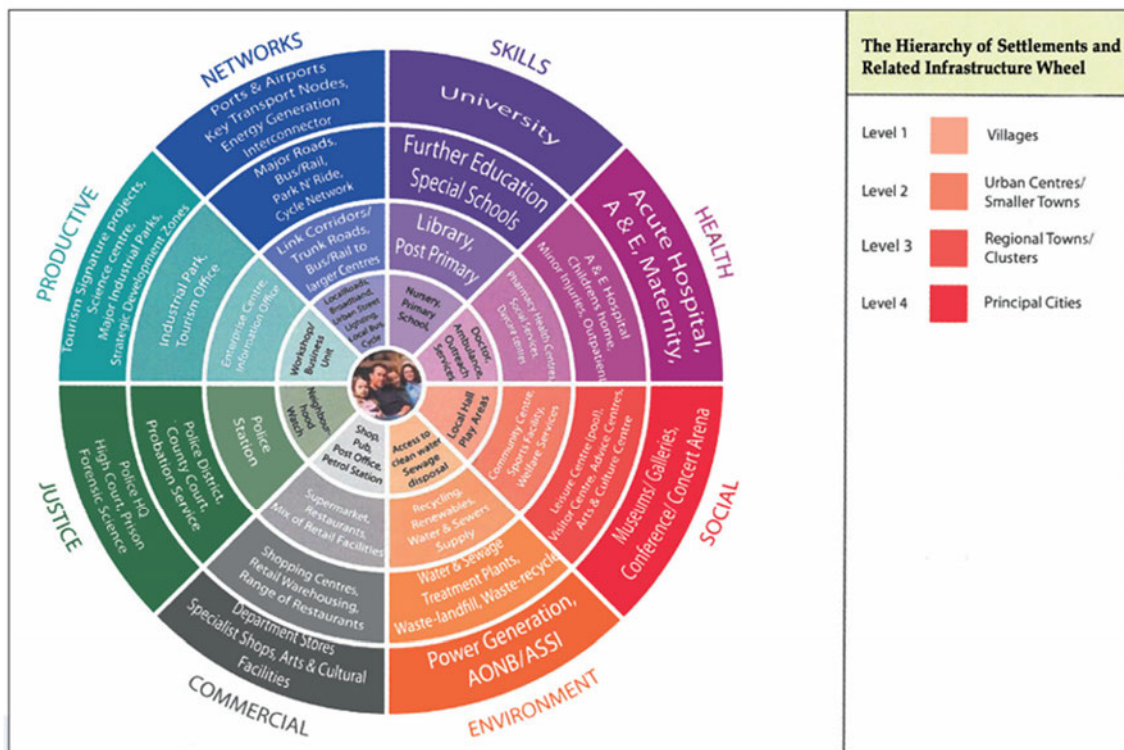
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- 2.6 Extending the Plan Strategy to a 15-year period from adoption would properly fulfil the role of the LDP in providing greater certainty for the Council, infrastructure providers, investors, developers and the public.
- 2.7 An alternative approach to adopting a longer plan period would be to identify additional reserves of land that could provide meet any emerging need by way of an over-allocation of land, in the form of a further flexibility allowance or reserve, as has been accepted practice in other cases including BMAP. Our clients land would offer a reasonable and realistic option to provide such necessary lands to meet anticipated need.
- 2.8 As things currently stand, it is our considered view that the DPS does not provide an appropriate long-term framework to support the economic and social needs of a council's district. The DPS is therefore unsound by virtue of its failure to meet the SPPS requirements to provide a long-term spatial strategy and its failure to fulfil the functions set out in DPPN 1. It is therefore unsound in respect of:
- Consistency Test C3 - failure to take account of policy and guidance issued by the Department.

### 3.0 KIRCUBBIN IN THE SETTLEMENT HIERARCHY

#### Spatial Growth Strategy & Settlement Hierarchy

3.1 The DPS proposes to designate Kircubbin as a village under Spatial Growth Strategy SG 2, and states that the designation is based on a full evaluation of all settlements as set out in Technical Supplement 1 - Settlement Hierarchy and Strategic Settlement Evaluation, which takes into account the RDS Regional Spatial Framework, including the six tests of the Housing Evaluation Framework (Resources, Environmental Capacity, Transport, Economic Development, Urban/Rural Character, Community Services), the Hierarchy of Settlements and Related Infrastructure Wheel, census data, the existing development plans.



**Figure 1: RDS Hierarchy of Settlements and Related Infrastructure Wheel**

- 3.2 We support the key aim of the DPS in seeking to define a spatial growth strategy that supports the development and regeneration of the area socially, economically and environmentally.
- 3.3 We acknowledge that the RDS provides a hierarchy of settlements and related infrastructure wheel (Figure 1), which outlines the patterns of service provision that are likely to be appropriate at different spatial levels including villages, smaller towns, regional towns and principal cities.
- 3.4 The RDS Hierarchy of Settlements and Related Infrastructure Wheel provides direction on the range of public and private services needed to ensure citizens have access to the necessary economic, social and cultural opportunities, as well as the infrastructure required by businesses to build a competitive dynamic and innovative economy. These services include transport and communication networks, education, health, social, environment, commercial and justice. The wheel outlines the patterns of service provision that are likely to be appropriate at different spatial levels in the settlement hierarchy. The model recognises the strong

relationship between settlement size and the levels of service that can be supported. The wheel provides a forward perspective, providing some understanding of the level of facilities and services anticipated at different spatial levels rather than necessarily reflecting the stock of services that are currently available in villages, towns, cities or regionally (emphasis added).

Infrastructure Group	Tier 2 – Local & Small Towns	Commentary
Skills	Library, Post Primary	2 primary schools
Health	Pharmacy, Health Centre, Social Services, Day Care Centre	Dental practice, Medical Centre/GP practice, pharmacy, optician, physiotherapy practice.
Social	Community Centre, Sport Facilities, Welfare Services	Telephone exchange, several Churches & 2 cemeteries within settlement limits, community centre, orange hall, masonic hall, 2 play parks, sports pavilion & playing pitch – Kircubbin FC.  Sailing club  Public toilets and car parks
Environment	Recycling, Renewables, Water & Sewer Supply	Council Recycling centre & bins. Capacity at Kircubbin WWTW.
Commercial	Supermarkets, Restaurants, Mix of Retail Facilities	Credit Union, MLA Advice Centre, Petrol filling station, Post Office, Off Licence, estate agents, 3 convenience stores, numerous public houses, restaurants/cafes, fast food outlets, internet café, charity shops, hairdressers, bakery, opticians, barbers, florist, bookmaker, butcher, ice cream parlour and pet shop.
Justice	Police	PSNI station closed – in line with practice in many local towns across the region.
Productive	Enterprise Centre, Information Office	No employment zoning. However, 2 significant employers in settlement.

<b>Networks</b>	Link Corridors, Trunk Roads, Bus/Rail to Larger Centres	Strategic location on Link Corridor providing connections to Newtownards, Bangor & Belfast. Main bus route to/from Belfast, as well as connection to bus station in Newtownards.
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**Table 1: Kircubbin: Comparison with RDS Small Towns Infrastructure Parameters**

- 3.5 The RDS Spatial Framework sets the context for determining future development priorities. The role of settlements located on key transport corridors and link corridors is a significant consideration in assessing the growth potential of a settlement as enhanced accessibility between the critical mass together with the settlement own services/employment/residential offer reduces the need to travel, encourages sustainable movement choices, makes efficient use of infrastructure and resources, as well as successfully and sustainably integrating new employment and residential development uses, all of which are aspirations within the RDS. The location of a settlement along a link corridor provides it with an advantage in terms of its role and its growth potential, which embodies the *'forward perspective'* envisaged by the RDS.
- 3.6 While it is recognised that Kircubbin lacks critical mass in respect of bald population numbers, the village does provide many of the services akin to a small town to its residents and the surrounding hinterland. The growth allocation for the next 15 years should reflect that position.

## 4 DPS HOUSING STRATEGY

### Spatial Growth Strategy & Strategic Housing Allocation

- 4.1 We welcome the DPS Strategic Objectives, and particularly the Spatial & Cross-cutting and Social Objectives to:
- Promote sustainable growth in the right places and at the appropriate level, to meet the needs of all those who live, work, visit and invest in the Borough.
  - To create sustainable places throughout the Borough through design, layout and mix of uses that enhance the character and identity of settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote prosperity, and well-being of citizens.
  - To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.
  - To create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.
  - To support rural communities by providing appropriate and sustainable opportunities for development in the countryside.
  - To build sustainable resilient communities where people have good access to housing, employment, shops, public transport, active travel, healthcare, community and cultural facilities.
  - To improve health and wellbeing - by facilitating health, education, community and cultural facilities in accessible locations and creating places that encourage a healthy lifestyle through the provision of high-quality open space and sporting facilities, informal leisure spaces and increase opportunities to walk, wheel, or cycle.
- 4.2 Further, the Spatial Growth Strategy set out under SGS 1 merits support and in the context of this submission, we particularly welcome the objective to:
- Sustain and maintain the diversity and quality of our villages by encouraging local development which supports the population and services of local communities.
- 4.3 We agree that the focus of growth and the need to direct new development is directed to the most appropriate places and that the scale of development for any given settlement should be commensurate with the capacity of that settlement to support it which will also capitalise on the benefits arising from the efficient use of existing community facilities, services and infrastructure in the villages that benefit from a strategic location on key transport corridors.
- 4.4 We also support the employment-led housing growth strategy as an appropriate approach to the calculation of the level of housing needed to support the job creation targets. However, in the context of our position in respect of the appropriate plan period set out in section 2 of this submission, we are strongly of the view that the number of new homes should be extrapolated upwards to apply to a more appropriate plan period.
- 4.5 The Strategic Housing Allocation proposed for the villages is 1,265 units of which 1,076 is taken up by 'existing commitments' and a further 690 units allocated against predicted windfall allowance. That scenario would leave the 16 settlements proposed as villages with an oversupply of housing.

## LDP Submission

- 4.6 One of the 8 stated aims of the RDS is to support our towns and villages and rural communities to maximise their potential: *“Our rural areas including our towns and villages have a key role in supporting economic growth. They offer opportunities in terms of their potential for growth in new sectors, the provision of rural recreation and tourism, their attractiveness as places to invest, live and work, and their role as a reservoir of natural resources and highly valued landscapes.”* Therefore, in that context, while acknowledging the need to grow the population of hubs and clusters (SFG12), the RDS also emphasises (SFG13) the importance of sustaining rural communities living in smaller settlements and the open countryside as the distinctive settlement pattern of main and small towns, villages and dwellings in the open countryside is unique within these islands. *“The rural community is the custodian of our exceptional natural and built environment. In rural areas, the aim is to sustain the overall strength of the rural community living in small towns, villages, small rural settlements and the open countryside.”*
- 4.7 The SPPS states that, in order to maintain and enhance the attractiveness of the countryside as a place to invest, live and work, the countryside requires a sustainable approach to new development, consistent with the RDS. The RDS recognises that to sustain rural communities, new development and employment opportunities are required which respect local, social and environmental circumstances. Facilitating development in appropriate locations is considered necessary to ensure proposals are integrated appropriately within rural settlements or in the case of countryside locations, within the rural landscape.
- 4.8 The SPPS also stresses that Government policy recognises the wide variations in the economic, social and environmental characteristics of rural areas and requires that policy should be tailored to reflect these differences, be sensitive to local needs and sensitive to environmental issues, including the ability of settlements and landscapes to absorb development.
- 4.9 While it is acknowledged that the Council have confirmed that the allocations set out under SG 5 is an indicative strategic allocation for settlements and that more detailed analysis will take place at Local Policies Plan stage, a blanket approach that concludes there is already an over provision in existing villages and doesn’t take proper account of the varying needs of different areas within the Borough such as the southern portion of the Ards Peninsula, will fail to deliver a sustainable approach to the direction of development.
- 4.10 The DPS needs to set the strategic context and direction by making provision now for a greater share of the allocation to go to settlements where there is an identified need and where delivery can be readily supported by existing infrastructure.

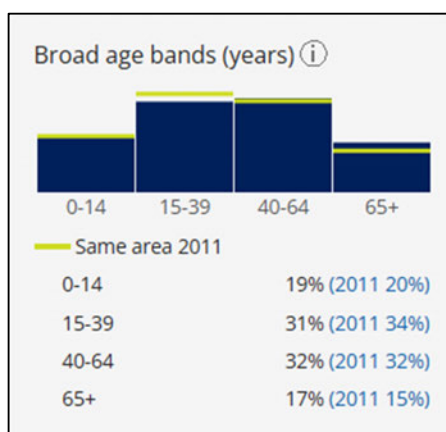


Figure 2: NI Census 2021 & 2011

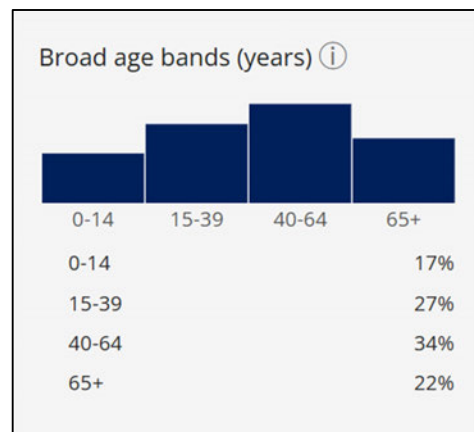
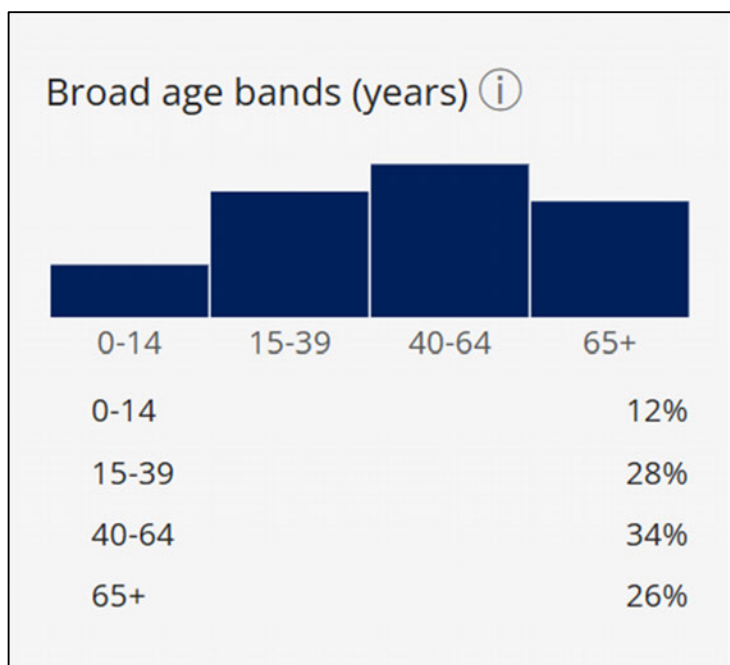


Figure 3: Ards & N. Down BC 2021



**Figure 4: Census 2021 – Ards Peninsula Data Zone F4: Kircubbin**

- 4.11 The developing demographic profile of the council area, and in particular, that of rural areas such as the Ards Peninsula, towards an ageing population and with an associated decline in the working age cohort 16-64 is a real cause for concern. Comparison of the 2021 census data<sup>1</sup> in respect of the key age groups with the 2011 figures confirms the pattern of decline in the 0-14 and 15-39 cohorts with an increase in the numbers in the 65+ grouping in Northern Ireland generally (Figure 2). The figures for Ards & North Down (Figure 3) confirm the DPS position that the Borough is below the NI average in respect of key indicators for population growth.
- 4.12 It is notable that the Ards Peninsula data confirms that the issue is even more of a problem in that part of the Borough and as Figure 4 confirms this is even more marked in the data zone that covers the village of Kircubbin, with a much lower proportion of the population in the younger cohort (0-14) and considerably higher proportion in the 65+ category.
- 4.13 There is clearly a need for the LDP to provide for appropriate growth in the Ards Peninsula generally but in Kircubbin, in particular, if the LDP is to fulfil its role of delivering sustainable rural communities. That position is supported by local estate agents (see Appendix 2) who have confirmed that there is a strong and ongoing demand for affordable homes for first time buyers in Kircubbin and the surrounding villages.
- 4.14 Kircubbin, with its current level of services, is well placed to accommodate future growth and indeed that growth will be critical to maintaining those services for the villages and its rural hinterland.
- 4.15 All of the land previously zoned for housing in Kircubbin has been developed. The HPA 2 zoning was fully developed prior to 2010. Suitable land to accommodate a suitable level of growth is in short supply due to the constraints set by the distinct landscape setting of the village around

<sup>1</sup> Source: NISRA Census 2021.

## LDP Submission

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the environmental designations associated with Strangford Lough, the rising land to the east and the sensitive landscape designations at Monaghan Bank and Nunsquarter.

4.16 Our clients' lands (Appendix 1) are well positioned along Parsonage Road close to the existing housing provision under HPA 2, the integrated Primary School, civic amenity site and local shops and services.

4.17 At paragraph 2.24 the DPS states that:

*“In defining settlement development limits at Local Policies Plan (LPP) stage the main objectives will be to promote and accommodate new development, and also to contain it within the limits in order to maintain a clear distinction between the permissible developable area and the surrounding countryside. Account will be taken of the RDS direction to achieve compact urban forms, concentrate resources and protect settlements from urban sprawl, and against the merging of settlements.”*

4.18 Our clients' lands offers the opportunity for Kircubbin village to expand in a manner that is consistent with the RDS direction to sustain the overall strength of the rural community living in small towns, villages, small rural settlements and the open countryside.

4.19 The strategic policy set out in the DPS should facilitate delivery of that necessary and appropriate expansion through its strategic allocations and policy framework. As things stand the DPS fails to provide that an appropriate framework to facilitate appropriate growth of settlements such as Kircubbin in a sustainable manner in line with the overall strategic objectives of the DPS, the RDS and SPPS. In that context the DPS is unsound in respect of:

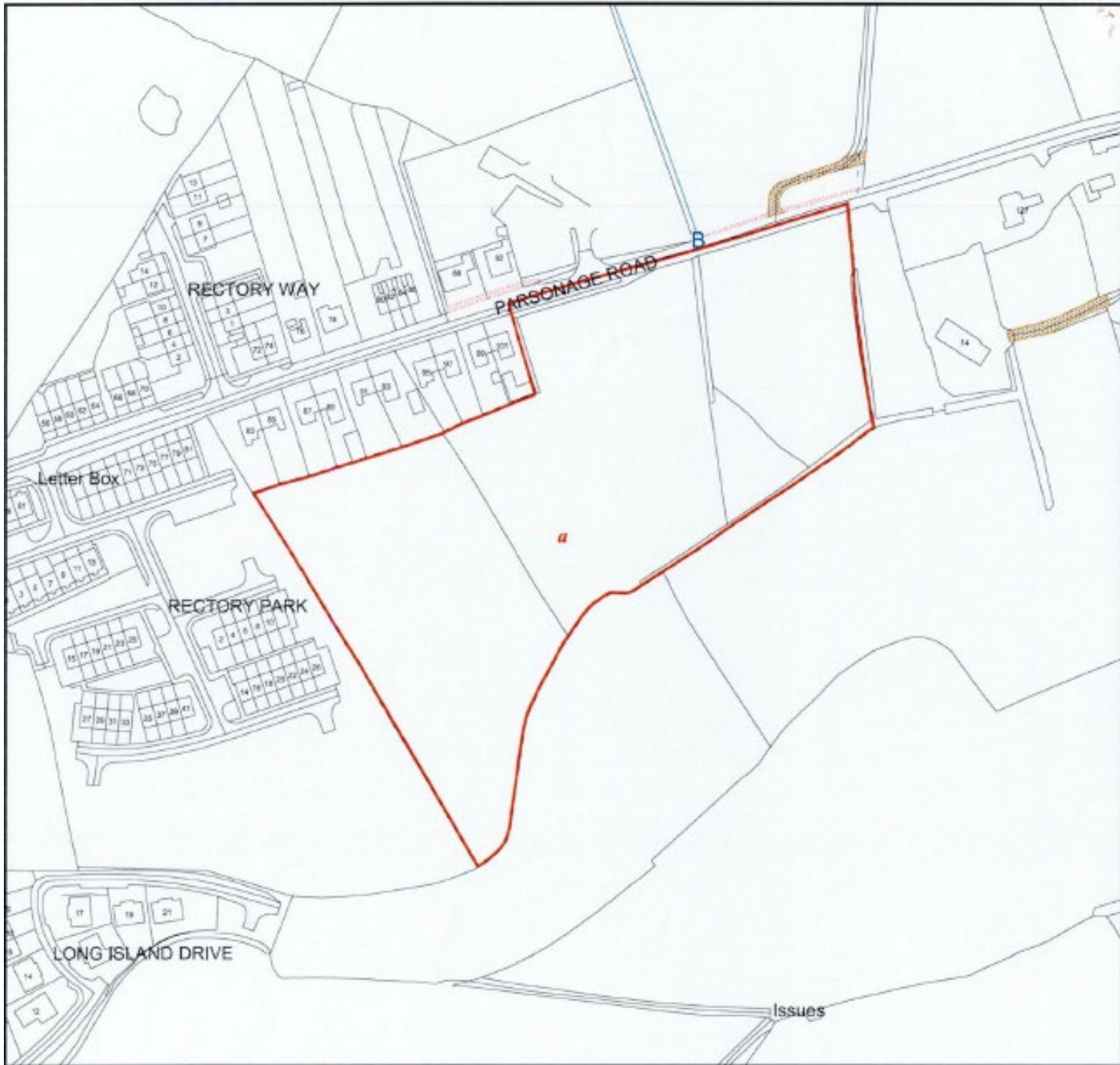
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
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- Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
- Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

## **5.0 CONCLUSIONS**

- 5.1 For the reasons outlined above the DPS is unsound in respect of:
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
  - Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
  - Coherence & Effectiveness Test CE1 – it fails to set out a coherent strategy from which its policies and allocations logically flow
  - Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.
- 5.2 Our client subject lands offer a real option in addressing the DPS shortcomings.
- 5.3 We would welcome further engagement with the Council in respect of these matters.
- 5.4 Our client would wish to participate in any oral hearing into the DPS.



## Appendix 1: Subject Lands



## **Appendix 2: Additional Supporting Information**

Belfast Office  
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Kircubbin Office  
T: 028 4272 1217

E: hello@dynesresidential.com  
W: dynesresidential.com



9<sup>th</sup> March 2026

To Whom It May Concern,

**Re: Demand for Affordable First-Time Buyer Homes in Kircubbin and the Ards Peninsula**

We are writing to confirm that, based on our experience as a local estate agency working across the Ards Peninsula, there is a strong and ongoing demand for affordable homes for first-time buyers in Kircubbin and the surrounding villages.

In our day-to-day work, we regularly speak with individuals and young families eager to get onto the property ladder. Many are looking for modestly priced homes within this area, attracted by the strong sense of community, access to local schools and amenities, and the convenience of living within the Ards Peninsula.

Currently, there is a noticeable shortage of housing that meets these needs. As a result, a number of interested parties we have registered on our books are unable to find suitable homes locally. We maintain a waiting list of prospective buyers actively seeking properties of this type, but unfortunately, the options simply aren't available at the moment.

We believe that the development of new, affordable homes aimed at first-time buyers would be very well received. Not only would it help meet the clear demand, but it would also allow local people and young families to remain in the community, supporting the long-term vitality of the area.

We fully support any proposals that seek to provide these kinds of housing options in Kircubbin and the wider Ards Peninsula, and we would be happy to provide further details about local demand or market conditions if required.

Yours Sincerely,



Alanna Dynes, ARLA, NAEA  
Director

Belfast Office: 17 Malone Road, Belfast, Co. Antrim, BT9 6RT

Kircubbin Office: 17 Ballygelagh Road, Kircubbin, BT22 1JQ

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