

Local Development Plan, draft Plan Strategy (DPS) Reconsultation - Reconsultation Survey

Instructions

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

Formal Consultation period

The Statutory Consultation period opens on 16 January 2026 and closes at 4.30pm on 16th March 2026

Responses to be returned to the LDP team at
2 Church Street , Newtownards BT23 4AP

or by email to planning@ardsandnorthdown.gov.uk

Respondents should note that any representations should be made in full to the Council. Further information or clarification will not be sought unless requested by an independent examiner.

Soundness

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

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

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

Tests of Soundness

The tests of 'Soundness' for Development Plan documents are as follows:

Procedural tests

P1 - Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

P2 - Has the Council prepared its Preferred Options Paper and taken into account any representations made?

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

Consistency tests

C1 - Did the Council take account of the Regional Development Strategy?

C2 - Did the Council take account of its Community Plan?

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

C4 - Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

CE2 - The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

CE3 - There are clear mechanisms for implementation and monitoring.

CE4 - It is reasonably flexible to enable it to deal with changing circumstances.

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

**Choose exactly 1 option*

Yes

No

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

**Choose exactly 1 option*

Yes

No

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

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

**Choose exactly 1 option*

Yes

No

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

Mr G. Dynes & Mr F Lyttle

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

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

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

12. 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.

Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

**Choose exactly 1 option*

Written (Choose this procedure to have your representation considered in written form only)

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.

13. Soundness of the Plan (optional)

Do you believe the draft Plan Strategy is sound?

**Choose exactly 1 option*

Yes

No

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

15. Procedural Tests - (optional)

P1 Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

**Choose exactly 1 option*

Yes

No

16. Test P1 Comments (optional)

17. P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made? (optional)

**Choose exactly 1 option*

Yes

No

18. Test P2 Comments (optional)

19. P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal? (optional)

**Choose exactly 1 option*

- Yes
- No

20. Test P3 Comments (optional)

21. P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD (optional)

**Choose exactly 1 option*

- Yes
- No

22. Test P4 Comments (optional)

23. Consistency Tests (optional)

C1 Did the Council take account of the Regional Development Strategy?

**Choose exactly 1 option*

- Yes
- No

24. Test C1 Comments (optional)

See attached report

25. C2 Did the Council take account of its Community Plan? (optional)

**Choose exactly 1 option*

- Yes
- No

26. Test C2 Comments (optional)

27. C3 Did the Council take account of policy and guidance issued by the Department?
(optional)

**Choose exactly 1 option*

Yes

No

28. Test C3 Comments (optional)

See attached report

29. C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district? (optional)

**Choose exactly 1 option*

Yes

No

30. Test C4 Comments (optional)

31. Coherence and Effectiveness Tests (optional)

CE 1 The DPD sets out coherent strategy, from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils?

**Choose exactly 1 option*

Yes

No

32. Test CE 1 Comments (optional)

See attached report

33. CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
(optional)

**Choose exactly 1 option*

Yes

No

34. Test CE 2 Comments (optional)

See attached report

35. CE 3 There are clear mechanisms for implementation and monitoring? (optional)

**Choose exactly 1 option*

- Yes
- No

36. Test CE 3 Comments (optional)

37. CE 4 It is reasonably flexible to enable it to deal with changing circumstances? (optional)

**Choose exactly 1 option*

- Yes
- No

38. Test CE 4 Comments (optional)

39. If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound. (optional)

40. Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy? (optional)

41. Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)
(optional)

Do you have any comments?

42. draft Habitats Regulations Assessment(HRA) (optional)

Do you have any comments on the draft HRA?

43. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

44. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

45. Please add any additional comments (optional)

What Happens Next?

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

You will receive a formal acknowledgement letter from the Council's Planning Department . We will issue this within 5 working days of your response.

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

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

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

ARDS & NORTH DOWN LOCAL DEVELOPMENT PLAN 2032

Representations to Draft Plan Strategy

Lands at Ballygalget Road, Ballygalget



Ballygalget
LDP Reps
Final
March 2026



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APPENDICES

Appendix 1: Subject Lands

Appendix 2: Letters of Support

1. INTRODUCTION

- 1.1 This representation has been prepared by Fay Planning Consultancy on behalf of our client, in response to the consultation in respect of the Ards & North Down District Council (*'the Council'*) Local Development Plan 2032 Draft Plan Strategy (*'DPS'*) issued on for formal consultation on 16th January 2026.
- 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 Ards & Down Area Plan 2015 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 The Council needs to reconsider the allocation of housing to small settlements. Further it needs to direct development to appropriate levels in the hierarchy and to areas and small settlement where there is a need for further growth and the capacity to accommodate such growth. A failure to do so would render the DPS 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 coherent strategies from which its policies and allocations logically flow and deliver consistency across the strategies and policy.
 - 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, it has not followed the Councils own evidence base.
- 1.6 We respectfully request that the Council re-consider this proposal, taking account of the concerns raised in this submission. We would welcome the opportunity to discuss these matters with the Council.
- 1.7 Our clients wish to be represented in any inquiry process to discuss these matters further.

2 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, Edition 2 (December 2025) 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.
- 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.
- 2.3 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,(added emphasis) to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."*
- 2.4 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.
- 2.5 That general approach has been followed in Belfast where the Plan Strategy adopted in May 2023 will guide future investment and development decisions to enable the sustainable spatial growth of the city through the period 2020-2035 in a context where the POP was published in 2017
- 2.6 While there is no equivalent minimum period specified in the RDS or SPPS the purpose of local development plans is to provide a strategic framework for the forward planning of development within the council area. While the Ards & North Down DPS seeks to provide a framework to cover the period 2017-2032, we are now 8 years into the LDP process and are only at the DPS stage. 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 approach means that a very significant portion of the plan period will have elapsed prior to adoption and the LDP Strategy will be more retrospective than planning for the future. In that context it does not 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 in the future. That is an unsustainable approach to plan making and is contrary to the overall objective of

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providing a forward planning framework on which to base development management decisions going forward.

- 2.7 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.
- 2.8 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. THE GROWTH STRATEGY

Spatial Growth Strategy SGS 1: Spatial Growth Strategy

3.1 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.

3.2 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 our rural communities in small settlements and the countryside by facilitating sustainable development of an appropriate scale and character that affords protection to rural character and our rich natural environment.

3.3 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.

3.4 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 data¹ 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 (Table 1). The

¹ Source: NISRA Census 2021.

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figures for Northern Ireland as a whole (Table 2) confirm the DPS position that the Borough is below the NI average in respect of key indicators for population growth.

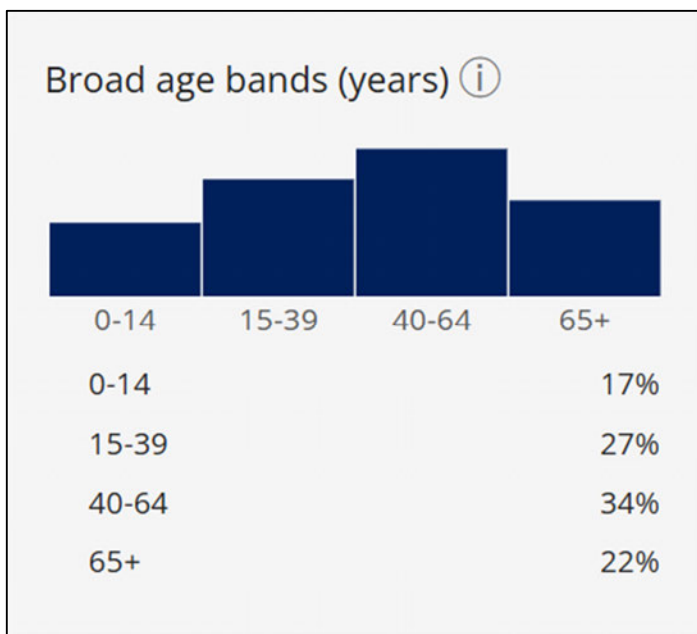


Table 1: Ards & North Down BC: Census Figures 2021 & 2011

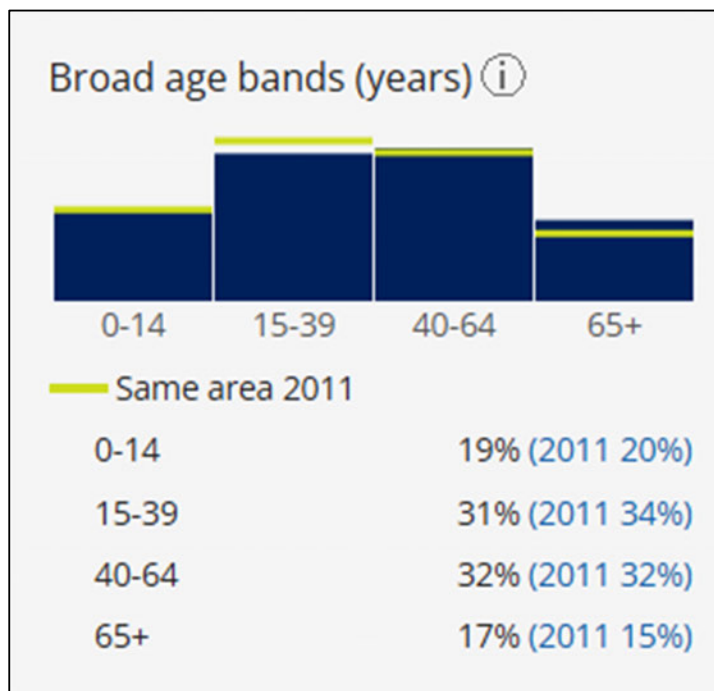


Table 2: Northern Ireland: Census Figures 2021 & 2011

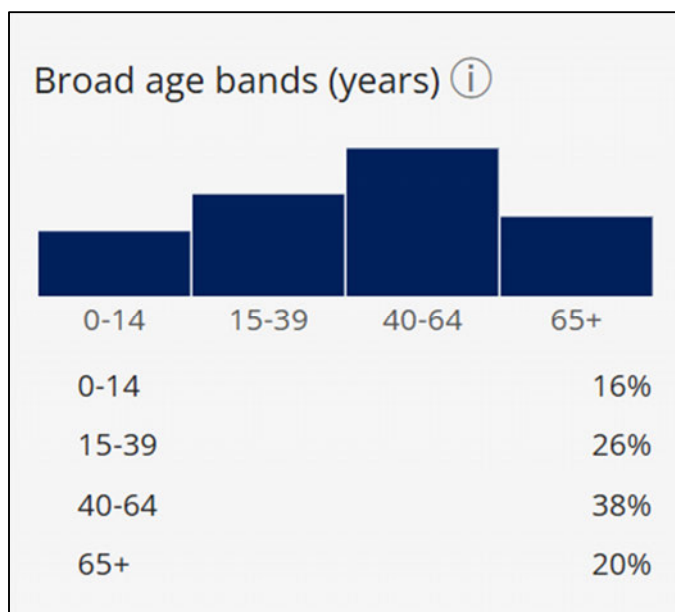


Table 3: Ards Peninsula Super Data Zone L

- 3.5 The statistics for the Super Data Zone L within which Ballygalget falls (Table 3) confirms that the trends for this part of the Borough are even more concerning, with much higher percentages of the population in the dependant 65+ sector and lower percentages in the 0-14 and 15-39 cohorts.
- 3.6 The Regional Development Strategy (RDS) 2035 confirms that, for the purpose of its spatial framework those places outside the Principal Cities, the Main and Local Hubs are identified as constituting the rural area. It acknowledges that the recent growth in the rural community living in small towns, villages, and small settlements in the countryside, reverses a long-term trend of population decline. At paragraph 3.94 the RDS stresses that: *‘we must also strive to keep our rural areas sustainable and ensure that people who live there, either through choice or birth, have access to services and are offered opportunities in terms of accessing education, jobs, healthcare and leisure.’*
- 3.7 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.”*
- 3.8 The DPS sets out the Strategic Housing Allocation across settlements in Table 4 and further in Table 6. The DPS proposes an allocation 1% of the total housing to the small settlements with 4% allocated to the open countryside. The allocation to the open countryside appears to be based on an analysis of the trends in build out in the countryside. So, rather than seeking to

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implement strategic policy that, in line with the direction provided by the RDS and SPPS, the DPS accepts the status quo, and the allocation simply reflects the current position. That approach is not sustainable in that the objectives of the RDS which at RG8 aims to manage housing growth to achieve sustainable patterns of sustainable development. Following that directive the SPPS sets out its regional strategic objectives for development in the countryside as being to:

- manage growth to achieve appropriate and sustainable patterns of development which supports a vibrant rural community;
- conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
- facilitate development which contributes to a sustainable rural economy; and
- promote high standards in the design, siting and landscaping of development.

3.9 The Strategic Planning Policy Statement (SPPS) directs that, in preparing LDPs councils must take account of the RDS 2035, the Sustainable Development Strategy for Northern Ireland, the SPPS and any other policies or advice in guidance issued by the Department such as landscape character assessments.

3.10 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.

3.11 The SPPS 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.

3.12 In Table 6 the DPS indicates that there is a potential for over-provision of housing in small settlements based on a figure of 176 units allocated across 20 small settlements. The proportion of the allocation needs to be increased to accord with the policy direction in the RDS and SPPS so that the settlements can provide a genuinely sustainable approach to managing development in the countryside. Further, in the context of our position on the Plan Period, that allocation should be extrapolated to take account of an appropriate Plan Period that provides for proper forward planning for the Borough.

3.13 While it is acknowledged that the Council have confirmed that this 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 small settlements 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. 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.

3.14 In context of the above the DPS is unsound in respect of:

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- 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 Test CE1 - The DPS fails to set out a coherent strategy from which its policies and allocations logically flow and deliver consistency across the strategies and policy.

4. BALLYGALGET IN THE SETTLEMENT HIERARCHY

Spatial Growth Strategy SGS 2: Settlement Hierarchy

- 4.1 The DPS proposal under SGS 2 is to retain Ballygalget as a small settlement (Figure 3: Settlement Hierarchy). This proposal is supported by the analysis in the Settlement Hierarchy & Settlement Evaluation (DPS Technical Supplement 1) which maintains the position from the current development plan – the Ards and Down Area Plan 2015. The appraisal states that occupies a level of services and infrastructure that places it below Level 1 of the Hierarchy of Settlements and Related Infrastructure Wheel. The appraisal does recognise that the settlement possesses a number of the attributes aligned to designation as a village, namely including access to clean water and sewage disposal, natural gas provision, 4G Mobile coverage and standard broadband availability, a primary school and adjoining play park, church and community hall and urban streets serviced by footpaths and street lighting. The evaluation identifies the weaknesses as being lack of healthcare facilities, post primary schools, library, limited employment opportunities and access to public transport.
- 4.2 The Settlement Evaluation concludes that: *“It is considered that Ballygalget offers a limited number of community services (church and school), and it displays a sense of cohesion and place it should be retained as a small settlement within the new Settlement Hierarchy.”*
- 4.3 Our analysis of the settlement of Ballygalget is that it satisfies the majority of the criteria in the RDS Infrastructure Wheel that would merit consideration of the settlement being classified as a village in the settlement hierarchy. In addition to the infrastructure and social facilities referenced in the Council settlement appraisal, the local GAA club is located a short distance to the north of the settlement limit. It provides a grass playing pitch, an artificial pitch, a walking/running track and a community gymnasium/health & well-being centre. All of these facilities are widely used by all sections of the community and together with the local community hall these facilities form an important social hub for the existing settlement and the whole of the wider hinterland.
- 4.4 The Regional Development Strategy (RDS) 2035 confirms that, for the purpose of its spatial framework those places outside the Principal Cities, the Main and Local Hubs are identified as constituting the rural area. It acknowledges that the recent growth in the rural community living in small towns, villages, and small settlements in the countryside, reverses a long-term trend of population decline. At paragraph 3.94 the RDS stresses that: *‘we must also strive to keep our rural areas sustainable and ensure that people who live there, either through choice or birth, have access to services and are offered opportunities in terms of accessing education, jobs, healthcare and leisure.’*
- 4.5 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.”*

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- 4.6 The RDS also recognises that there are wide variations across Northern Ireland in terms of economic, social and environmental characteristics of rural areas. The DPS must recognise these differences and reflect the RDS identified need to be sensitive to local needs and environmental issues including the ability of settlements and landscapes to absorb development. Key considerations will be the role and function of rural settlements and accessibility to services.
- 4.7 Ballygalget, as the local settlement, plays a critical role in supporting local services and amenities. These include the local facilities and particularly the local primary school, local churches and local sports clubs.
- 4.8 St Patrick's Primary School, Ballygalget has a remarkable reputation in providing an excellent learning environment for young people. However, the school is struggling to maintain enrolment at a level that will ensure its longer-term sustainability.

School Year	Year 1 Intake	Year 7 Departures	Total Enrolment
2020/2021	16	11	116
2021/2022	15	14	117
2022/2023	16	14	119
2023/2024	11	15	120
2024/2025	18	23	118
2025/2026	5	18	101

Table 4: St. Patrick's PS Enrolment Numbers 2020-2026

- 4.9 The Department of Education's Sustainable Schools policy states that primary schools should have at least 140 pupils in urban areas and 105 in rural areas to be sustainable. While the enrolment numbers have been reasonably consistent, there is a notable drop off in the intake for the 2025/26 school year and the figures of young pre-school age children in the catchment indicates that this decline will continue. Therefore, St Patrick's Primary School, on current trends would appear to be a rural school at risk of closure unless those trends change reasonably soon. That would have a devastating effect on the Ballygalget parish and community and is contrary to the objectives of the RDS and the Strategic Planning Policy Statement (SPPS). (See attached letter from St. Patrick's PS, Appendix 2)
- 4.10 A Queen's University Study² on the relationships between small rural primary schools and their communities in Northern Ireland drew the following conclusions:

² Bagley, C., & Fargas, M. (2025). Hollowing out communities: small rural schools in Northern Ireland and the threat of closure. In J. D. Johnson, & H. L. Harmon (Eds.), *Handbook on Rural and Remote Education* (pp. 461–474). Elgar. <https://doi.org/10.4337/9781035307722.00040>

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- Small rural schools are also perceived to have definite strengths, most common being their strong relationship with the community, the low pupil-to-teacher ratio (ideal to meet children’s individual needs), and the family-like environment where everybody knows and supports each other.
- Small rural schools are a big part of their rural communities. They are perceived to be ‘at the heart of the community’. This can mean different things depending on the school, but they often are a ‘meeting point’ where people come together. Schools organise community events, share resources with different groups, and contribute to the economy of the area, among many other things.
- The relationship between the school and the community was found to be a powerful, mutual, dynamic relationship, the intricacies of which depended on the historic, social and geographic context of the school itself. Bringing children to, working in, and attending the school were perceived as reinforcing a sense of belonging and pride to be part of that community.
- Interviewees in the case study schools were dismayed at the prospect of losing the school, arguing that it would be the break-up/end of the community if that happened.

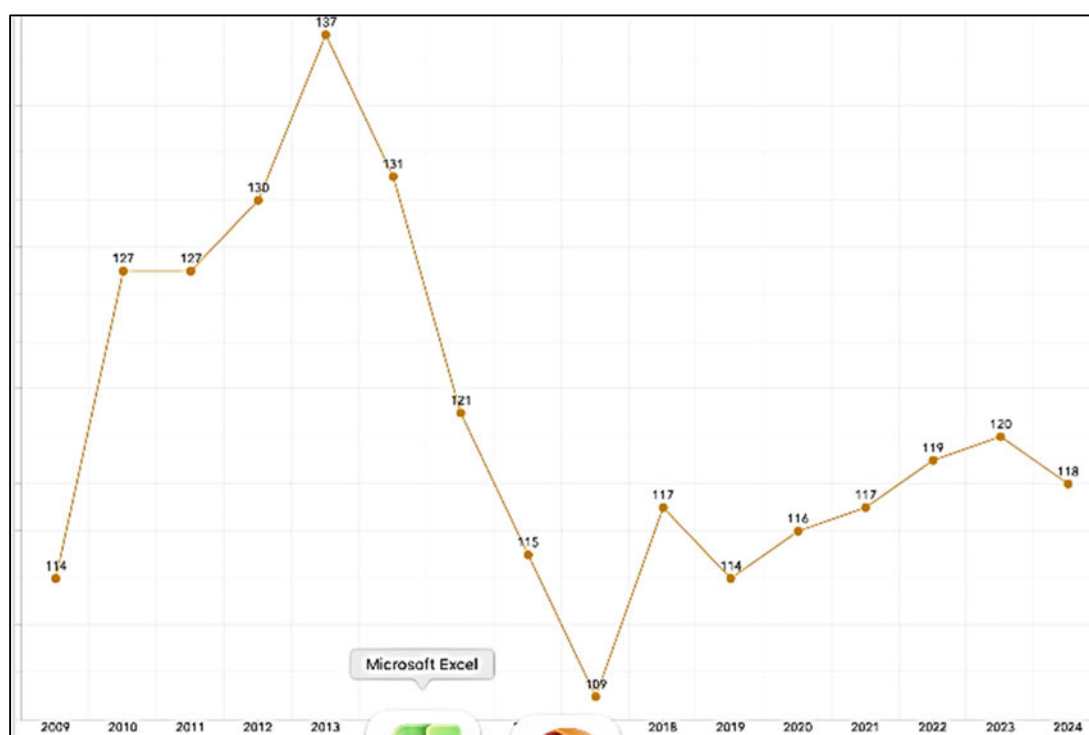


Figure 1: St. Patrick’s Ballygalget PS Enrolment 2009-2024

4.11 The historic enrolment figures for Ballygalget Primary School as illustrated in Figure 2 reinforce the close correlation between the settlement and the school. The school enrolment peaked in 2013 and then dropped very steeply to a figure of 109 which is on the absolute threshold of viability in 2017. Remarkably the numbers picked up again with a large intake of new pupils in 2018/2019 when the housing development at Olivers Close was completed and occupied. However, when that cohort of children passed through the school the numbers dropped dramatically to an all-time low of 5 new pupils in 2025/2026 and as a result the enrolment this year stands at 101 which is well below the threshold where closure becomes a real possibility.

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- 4.12 The settlement therefore has a direct and critical role to play in the future viability of the community's primary school. Relatedly, it also impacts on the wider community.
- 4.13 The school is closely related to the wider parish activity as evidenced by the letter of support from the Parish Priest (Appendix 2). That submission emphasises how the local community suffers from rural isolation and declining numbers in the younger age groups. The community has close links to agriculture and that bring serious pressure for development in the open countryside where opportunities in nearby small settlements such as Ballygalget are severely restricted. Close family ties and the intergenerational support network at both ends of the age profile are so critical to maintaining community cohesion and structure. Retaining young families in the locality is crucial to the provision of the valued cross-community social activities and interaction.
- 4.14 The local GAA club, Ballygalget GAC is based just over half a mile to the north of the small settlement. The club offers a sporting and social outlet for the surrounding community, providing a playing pitch for gaelic games but the facilities also include a community gymnasium and hub, a walking/running track and a 4G artificial playing and training area that is rented out to other clubs in the locality. The club provides a vital sports and social outlet for the whole community as evidenced by the level of participation from across the board in its annual health and well-being programme and other community initiatives including dementia awareness. However as confirmed in the letter of support from the club (Appendix 2) they too suffering from declining numbers related to lack of available family housing in the area.
- 4.15 Modest growth of the small settlement of Ballygalget would provide a vital foundation for community sustainability. The DPS should make provision to allow appropriate growth of the settlement to ensure that there is modest provision for new housing in the locality, of a scale that does not diminish the overall objective of the RDS settlement hierarchy and thereby sustain rural communities and critical services, including education, in line with the RDS strategic objectives. The Housing Land Availability Study 2025 confirms that there were no house built in the settlement of Ballygalget in 2023-2024 and in 2024-2025. The Study also confirms that there is potential for 1 unit within the settlement limit. If Ballygalget is to meet the requirements of the local community and sustain the critical services a further modest expansion of the settlement is required.
- 4.16 It is recognised that the DPS confirms that the strategic allocation for settlements is indicative at this stage and that more detailed analysis will take place at Local Policies Plan stage including a review of existing zonings, urban capacity sites, and an up-to date assessment of infrastructure capacity, in particular relating to wastewater treatment works upgrades and network capacity. This may require some adjustments be made to the allocation. It is our considered view that the strategic policy set out in this DPS should reflect that position.
- 4.17 The SPPS 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.
- 4.18 Our clients support the overall vision of the DPS and welcomes the social objectives to deliver the vision and in particular, the social objectives which seek 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 through the Plan period.
 - Create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.

LDP Submission

- Support rural communities by providing appropriate and sustainable opportunities for development in the countryside.
 - Build sustainable resilient communities where people have good access to housing, employment, shops, public transport, active travel, healthcare, community and cultural facilities.
 - 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.
- 4.19 As confirmed in the supporting letter from the local MLA (Appendix 2), the settlement of Ballygalget can play a vital role in helping to deliver on these objectives. However, for that to happen, the DPS needs to provide an appropriate response to the challenges facing Ballygalget and its rural hinterland. The settlement meets many of the required criteria to qualify as a designated village and the allocation of growth potential to the settlement should reflect that position and the needs of the local community to retain and provide sustainable support to their local primary school.
- 4.20 The PAC Report into the Ards & Down Area Plan 2015 recognised the importance of the lands around the church, community hall, parochial house and the school. It was acknowledged that, at that time the inclusion of 0.9 hectares south of the parochial house would provide for *'development on a scale commensurate with the physical form of the existing building group at this location.'*
- 4.21 The land included within the settlement at that location has been fully developed and indeed that has been the case since July 2017 which is the start date of this LDP. It is surprising therefore that the Settlement Evaluation undertaken in March-July 2020 concludes that there is land within the settlement development that was then undeveloped. That is at odds with the Housing Land Availability Study of 2025. It is not the case now and was not the case when the LDP process commenced.
- 4.22 Our clients' lands (See Appendix 1) would provide for modest and appropriate growth of the settlement, commensurate with the physical form of the existing building group at this location as confirmed in the previous PAC report. The majority of the lands were previously used as the builders' compound for the adjoining existing development and in essence comprise previously developed land for that purpose.
- 4.23 Further, the subject lands will consolidate the built form at the principal focal point of the settlement served by existing infrastructure that includes critical sewerage services, water and electricity connections, along with street lighting and a footpath connecting the lands to the church, community hall and school.
- 4.24 As outlined in section 3, the Council need to reconsider the Strategic Housing Allocation to allocate a greater share of future development to small settlements.
- 4.25 Further the DPS should review the position that there is scope for such a significant windfall within the existing limits of existing small settlements. The DPS should make provision for the modest and proportionate expansion of small settlements where there is an identified need, where the settlement has definite community focus around community facilities and where infrastructure is available to service the projected development requirement.
- 4.26 As things stand the DPS is unsound in respect of:
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy

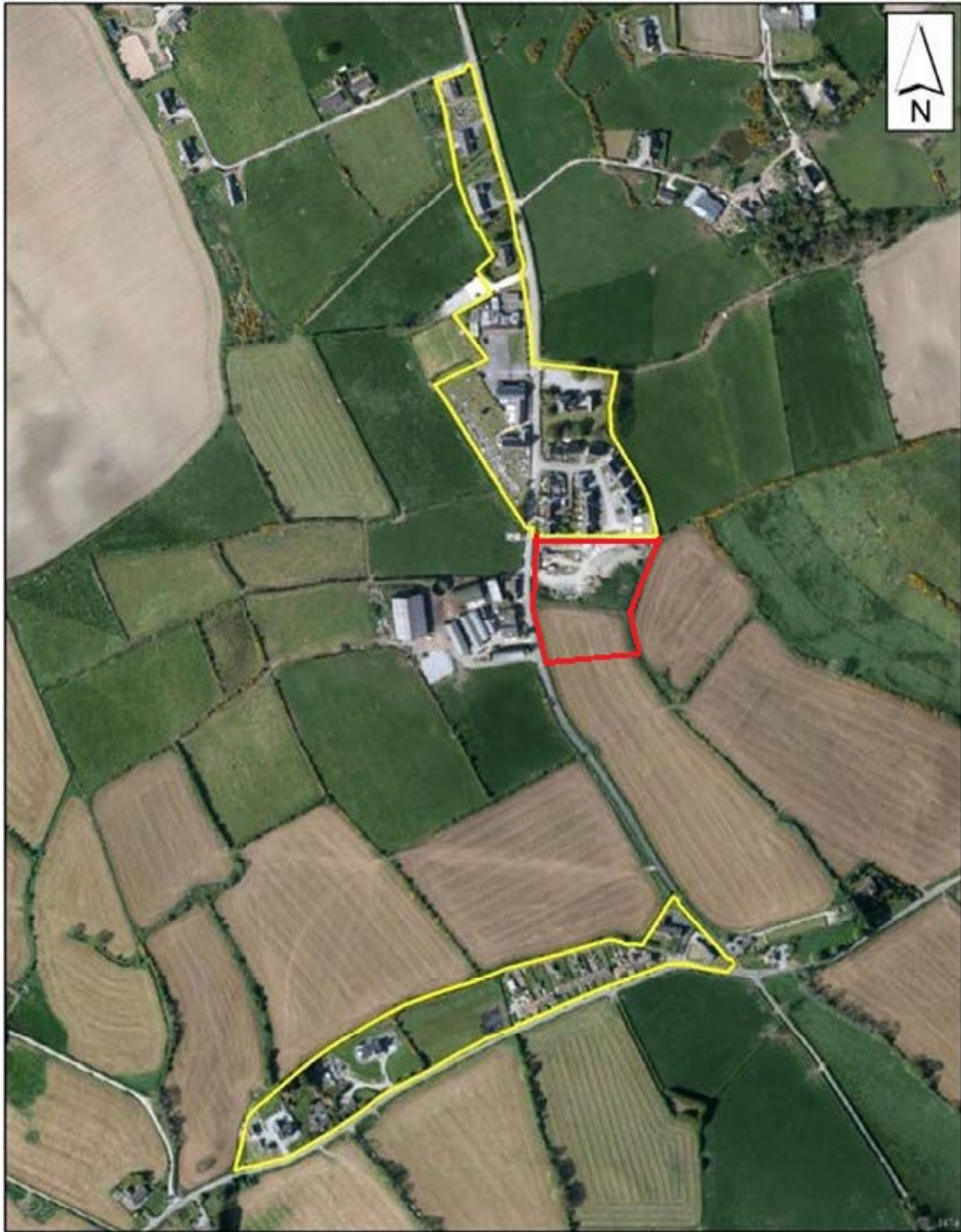
LDP Submission

- Consistency Test C3 – it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
- 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, it has not followed the Councils own evidence base.

5 CONCLUSIONS

- 5.1 The Council proposals in respect of the allocation of housing across small settlements in the Borough does not reflect the objectives of the RDS, the SPPS or indeed the overall objectives of the DPS.
- 5.2 There is a demonstrable interdependency between local schools, churches and their community. If pupil numbers fall the local primary school will be under threat of closure and those critical community connections will be lost. That outcome is also at odds with the objectives of the RDS, SPPS and the DPS vision and strategic objectives.
- 5.3 There is a demonstrable need for increased housing for young families in the southern part of the Ards Peninsula generally and in the area around Ballygalget particularly to sustain vital rural services that are so critical to the overall sustainability and cohesion of this rural area..
- 5.4 Our clients' lands offer an appropriate option to accommodate that appropriate growth.
- 5.5 We respectfully request that the Council re-consider this proposal, taking account of the concerns raised in this submission. We would welcome any opportunity to discuss these matters further with the Council.
- 3.6 Our clients wish to be represented in any inquiry process to discuss these matters further.

APPENDIX 1: SUBJECT LANDS



APPENDIX 2: LETTERS OF SUPPORT



St. Patrick's Primary School, Ballygalget

10 Ballygalget Road, Portaferry, Newtownards, Co. Down, BT22 1NE

"Friendship, Faith and Learning"

25th November 2025

To whom it may concern

Re: Support for Planning Proposal – Ballygalget Settlement Designation and Sustainable Growth

On behalf of St. Patrick's Primary School, Ballygalget, I am writing to express our full support for the planning proposal submitted by Fay Planning Consultancy regarding the proposed retention of Ballygalget as a small settlement within the Ards and North Down Local Development Plan 2035 and fully endorse the arguments for a modest extension to the settlement limits to provide additional homes for young families.

As a vital part of the Ballygalget community, our school plays a central role in the educational, social, and cultural life of the area. However, enrolment numbers have been steadily declining over recent years, placing the long-term sustainability of the school at risk. If this trend continues, it could have devastating consequences for the local community, including the loss of a key educational and social hub.

St. Patrick's Primary School is fully inclusive, catering for all pupils, including those with special educational needs. Our dedicated staff team ensures high-quality education and support for every child. The school also hosts events and fosters strong links with local families, reinforcing Ballygalget's identity and social cohesion. Staffing at St Patrick's was reduced in September 2025 due to falling enrolment. When the current housing in Oliver's Close was built, young families boosted pupil numbers, but as children grow older, numbers have declined. New homes are needed to attract young families, protect school growth, and sustain local jobs.

We strongly agree with the proposal's assertion that modest and appropriate growth within Ballygalget is essential to support the viability of local services, including our school. Our school catchment is fundamentally a rural one and we rely heavily on the small settlement of Ballygalget to provide homes for young families who would otherwise leave the area. The existing settlement beside our school and church, within walking distance, provides an important base of families, but numbers have been falling as young couples move away to find suitable housing. The proposed extension to the settlement opposite the church and school would help attract and retain families, support pupil numbers, and ensure St. Patrick's can continue to serve future generations. We believe this is a necessary and positive step toward securing the future of our school and strengthening Ballygalget as a vibrant and sustainable rural community.

Similar challenges have been identified in other rural communities, where declining enrolment has threatened the sustainability of local schools. The proactive approach outlined in this proposal reflects best practice in addressing these issues and demonstrates a commitment to preserving vital educational and social infrastructure. Beyond education, such growth strategies strengthen rural communities by supporting local businesses, enhancing cultural life, and ensuring long-term economic resilience.

We respectfully urge the Council to reconsider the current designation and support the proposed growth strategy for Ballygalget.

Yours sincerely,



Angela O'Prey
Principal

Principal: Mrs Angela O'Prey Telephone: 028 427 71832
Website: stpatricksballygalget.co.uk X: @stpatricksbg



THE PARISH OF BALLYGALGET

9 Ballygalget Road, Portaferry, BT22 1NE

St Patrick's Church

Local Development Plan Team,
Ards and North Down Borough Council
2 Church Street,
Newtownards,
BT23 4AP

12th December 2025

Dear Sir/Madam

Draft Local Development Plan Strategy 2032

I write on behalf of the parish of St. Patrick's, Ballygalget to place on record our full support for the submission made by Fay Planning Consultancy regarding the proposed retention of Ballygalget as a small settlement within the Ards and North Down Local Development Plan 2035 and fully support the arguments for a modest extension to the settlement limits to provide much needed additional homes for young families.

I am the parish priest for the parish of Ballygalget, which, due to declining numbers, is now jointly administered with St. Patrick's Portaferry. Ballygalget parish comprises circa 300 families but in recent years there has been a notable decline in numbers of children being baptised and in the number of children entering the primary school. The number of young families in the parish has been declining due to a lack of suitable and affordable housing in the area.

As a result, the age profile of the parish and surrounding area is becoming increasingly dominated by the older generation. The young families who do still live in the area are very active in the community and school life. Consequently, despite the relative isolation of this part of the Ards Peninsula, the community has retained a strong sense of belonging. There is a strong tradition of grandparents providing childcare which brings them into contact with the primary school and other community activities on a daily basis.

The area does suffer from issues associated with geographical isolation and therefore the inherent links that exist between the church and community hall, the school premises and the local GAA club are strong and multi-layered. All of these premises are used to great effect for inter-generational and cross-community events that have strengthened community cohesiveness and reduce any sense of rural isolation. The activities are many and varied, including faith based but importantly also wider community activities for youth groups, and social outreach for older people from the local area and further afield. These include adult fitness classes, cross-community senior citizens 'walking & talking' groups, dance classes, flower arranging and an annual senior citizen Christmas dinner. This is crucial to bonding the community locally and thankfully, there is a very strong common interaction between peoples of different traditions in this locality where farmers have always helped each other on a daily basis as the need arises, regardless of background and also come together for local social events.

The local school is an absolutely vital presence in the heart of the community. It has a great reputation for excellence in providing learning for children of all abilities and benefits immensely from the fact that the staff are also drawn for the local area of the lower Ards Peninsula.

60, Windmill Hill, Portaferry, BT22 1PH

Tel: 028 427 28234

Email: Ballygalget@downandconnor.org

These links and level of interaction are crucial to life in this locality, and it is a concern that the number of young families who provide the energy and drive that interaction, are declining in numbers. There are limited opportunities for the housing needs of young families to be met in this rural area given that current planning policy restricts opportunities for new houses in the countryside to essentially one house on a farm for each generation. That drives up the cost of building sites and creates a deficit in the supply of affordable homes for young families who are then forced to move out of the area, often closer to their work. That breaks the intergenerational interaction and linkage, and the local area suffers as a consequence.

It is a matter of great concern to me and to the wider community, that the numbers in the primary school are declining and approaching a level where the Department of Education may consider it to be unviable. The school plays a vital role in the educational, social, and cultural life of the area and is at the core of much of the social interaction that is so critical to sustaining our local community. If the trend of declining numbers is allowed to continue, it could have devastating consequences for the local community, including the loss of a key educational and social hub.

I strongly support the position that modest and appropriate growth within Ballygalget is essential to support the viability of local services, including our school. The existing settlement beside our school and church, within walking distance, provides an important base of families. The proposed extension to the settlement opposite the church and school would offer young couples an alternative to moving away to find suitable housing. It would help to attract and retain families, support pupil numbers, and ensure St. Patrick's Primary School can continue to play its crucial role at the heart of the community and serve future generations.

I respectfully urge the Council to reconsider the current designation and support the proposed growth strategy for Ballygalget.

Yours sincerely,

A large black rectangular redaction box covering the signature of the sender.

(V. Rev.)

P.P. Ballygalget.



LDP Team,
Ards and North Down Borough Council,
2 Church Street,
Newtownards,
BT23 4AP

10th December 2025

Dear Sir/Madam,

Draft Local Development Plan Strategy

Ballygalget GAC wishes to formally express its strong support for the principle of proposed housing development adjacent to Oliver's Close on the Ballygalget Road. Such development would provide vital and badly needed housing for our local community and, in particular, would greatly assist the continued growth and sustainability of our sports including GAA in this area.

Ballygalget GAC is a cross-community club that welcomes and supports people from every background. The club delivers a wide range of health and well-being programmes, including the Walkers and Talkers group, Ballygalget's Biggest Loser, and the Dementia Programme - initiatives that bring together individuals of all ages from across the community.

A new sports club, Ballygalget Athletics Club has emerged as a result of our development of a walking/running track around the club. It attracts young and older people from all backgrounds and provides a vital alternative outlet for those not interested in playing gaelic games.

Beyond its sporting role, Ballygalget GAC serves as an important social hub alongside the local primary school and community hall. Maintaining strong participation at underage level is essential to ensuring the long-term sustainability of the club, so that these valuable community services and programmes can continue to thrive.

In recent years, many families connected to our club have been forced to relocate due to the limited availability of suitable housing in the immediate area. This trend poses a significant challenge to maintaining team numbers and nurturing the next generation of players and athletes. In the longer term it will negatively impact on the services we can deliver to the wider community.

The addition of new family homes in Ballygalget is vital to stemming rural depopulation through increasing the supply of local housing and helping to sustain the local primary school alongside our club and the valuable sports and community activities it provides. As a community we ask that you give this proposal favourable consideration.

Kind Regards,


Club Chairperson

Ballygalget GAC, 12 Ballygalget Road, Portaferry, Newtownards. BT22 1NE.



Northern Ireland
Assembly

Kellie Armstrong MLA

Alliance Constituency Office, 14 South Street, Newtownards,
County Down, BT23 4JT

16 December 2025

Local Development Plan Team,
Ards and North Down Borough Council
2 Church Street,
Newtownards,
BT23 4AP

Re: Draft Local Development Plan Strategy 2032

Dear Sir/Madam

As the local MLA for the Ards Peninsula, I am writing to express my full support for the submission made by Fay Planning Consultancy regarding the proposed retention of Ballygalget as a small settlement within the Ards and North Down Local Development Plan 2035. I also fully support the case for a modest extension to the settlement limits in order to provide much-needed additional housing for young families.

Ballygalget is a close-knit rural community comprising approximately 300 families. In recent years, however, there has been a noticeable decline in the number of young families living in the area. This is reflected in falling numbers of children entering the local primary school and a broader shift in the age profile of the community towards an older population. A lack of suitable and affordable housing is a key factor contributing to this trend, with many young families being forced to move away from the area.

Despite its relative geographical isolation, Ballygalget continues to demonstrate a strong sense of community and belonging. Families who remain in the area are actively involved in community life, particularly through the school, community hall and local sports clubs. There is a strong tradition of intergenerational support, including grandparents providing childcare, which brings people of all ages together on a daily basis and helps sustain social connections.

The links between the school, community facilities and local organisations are particularly strong and play a vital role in reducing rural isolation. These venues support a wide range of inter-generational and cross-community activities, including youth programmes, fitness classes, senior citizens' groups, social outreach initiatives and seasonal community events.

Alliance MLA for Strangford // Constituency Office: 028 9181 1414
Kellie.armstrong@mla.niassembly.gov.uk
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