

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)

Castlesaint LLP

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 East of Main Street and South of
Rockfield Meadows, Carrowdore**



Carrowdore
LDP Reps
Final
March 2026

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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 Borough 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, the mineral strategy and proposed operational policy in respect of Mineral Safeguarding Areas.
- 1.3 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.
- 1.4 The Council must reconsider the proposed operational policy on mineral safeguarding to ensure that it is properly aligned with the regional SPPS and the overall strategy and objectives of this DPS. Further, it needs to direct development to appropriate levels in the hierarchy and to areas and settlements 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 The Council must 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 Therefore, the purpose of the LDP is to provide a forward planning framework to direct sustainable growth in the Council area in the years ahead.
- 2.3 Consistent with the approach adopted in the DPPN 1, 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 English Planning Inspectorate 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. The Wiltshire Local Plan provides 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.
- 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 Notwithstanding the absence of an equivalent minimum period specified in the RDS or SPPS, DPPN 1 provides that express period, and represents the only temporal expression in the planning hierarchy, where the SPPS refers to a "long-term spatial strategy". 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

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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 DPPN 1 and the overall objective of 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 any 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 Whilst welcoming 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 For the reasons set out in this submission there is conflict between these objectives, the proposed strategic and operational policy. On that basis the proposed strategy is materially unsound in respect of coherence and effectiveness test CE1.
- 3.3 Further, whilst the Spatial Growth Strategy set out under SGS 1 merits support and in the context of this submission, and 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.
- 3.4 Whilst 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, 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 must be extrapolated upwards to apply to a sound plan period.
- 3.5 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

¹ Source: NISRA Census 2021.

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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 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.

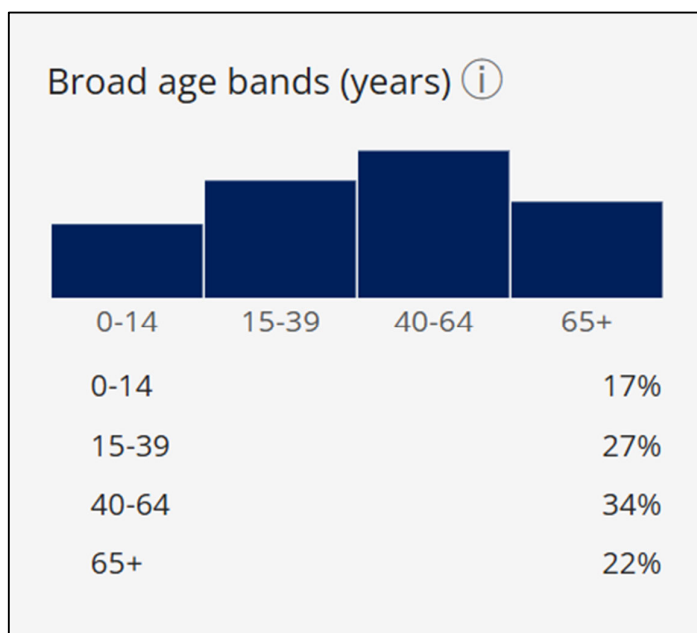


Table 1: Ards & North Down BC: Census Comparison 2021

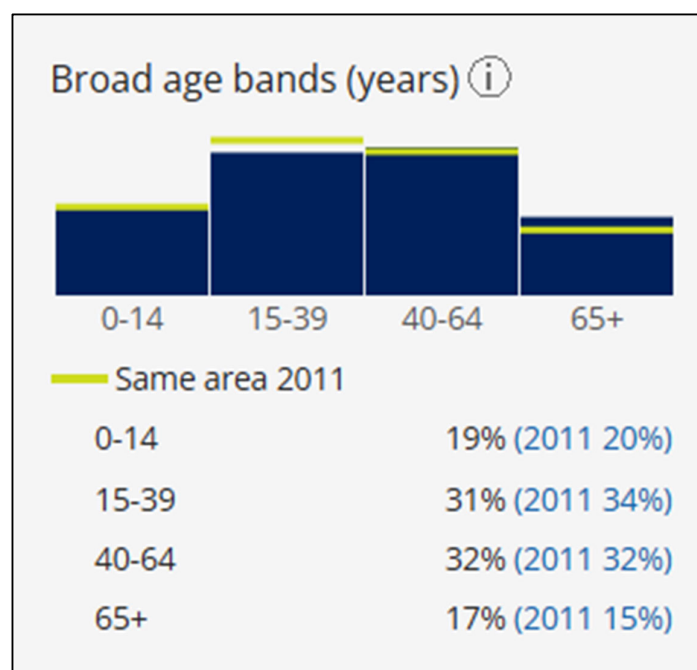


Table 2: Northern Ireland: Census Comparison 2021 & 2011

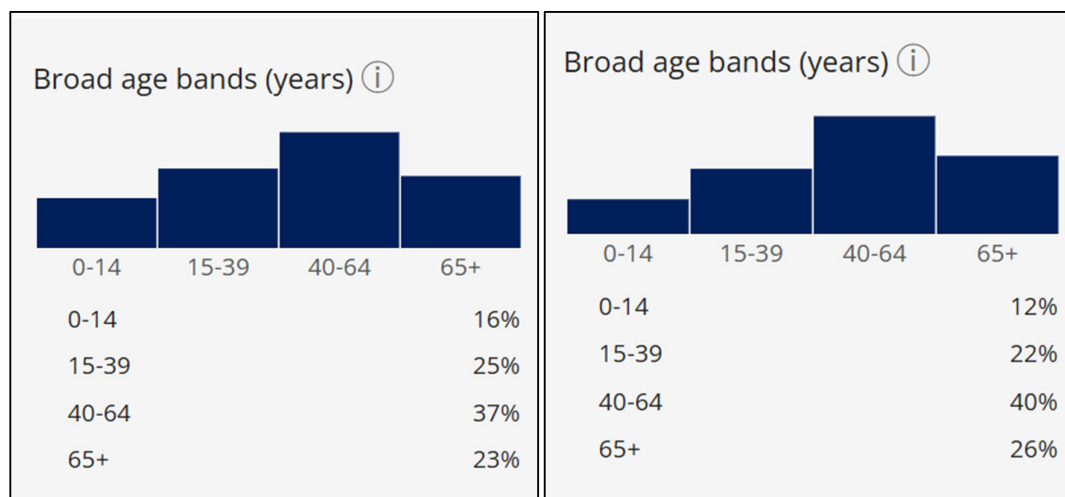


Table 3: Ards Peninsula Data Zones D & C5 Census Figures 2021

3.6 The statistics for the D & C5 data zones within which Carrowdore falls (Table 3) confirms that the trends for this part of the Borough are significantly more concerning, with much higher percentages of the population in the dependant 65+ sector.

3.7 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.’

3.8 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.”

3.9 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.”

3.10 The Ards & Down Area Plan 2015 made provision for development lands within the designated settlement limit which was defined to ensure the optimum use of existing land within the

4. MINERAL DEVELOPMENT STRATEGY

Operational Planning Policy MIN 4 Mineral Safeguarding Areas.

- 4.1 The DPS strategy for mineral development is to balance the need for exploiting reserves where they exist, with the need to protect and conserve the environment from the potential adverse impacts that may arise as a consequence. This is through identifying areas which should be protected from minerals development, safeguarding mineral resources which are of economic or conservation value, and providing for the full assessment of mineral proposals including the sustainable and safe restoration and reuse of mineral sites.
- 4.2 Policy MIN 4 – Mineral Safeguarding Areas (MSAs) proposes that:
- Planning permission will not be granted where surface development would prejudice the future exploitation of valuable mineral reserves.*
- Where there are minerals of economic or conservation value and those reserves have been proven to acceptable standards, surface development which would prejudice their future exploitation will not be permitted.*
- Mineral Safeguarding Area (MSA)'s will, where appropriate, be designated in the LPP using evidence to determine and support their extent.*
- Proposals must also comply with General Principles Policy GP 1 and all other relevant policies within the LDP.*
- 4.3 The justification and amplification in respect of the proposed policy is that extraction of minerals is limited to where they actually occur and that they need to be protected from surface development that could prejudice their future exploitation.
- 4.4 MSAs will be designated in the LPP 'using evidence to determine and support that safeguarding area.'
- 4.5 We note within the Policy it states:
- "Planning permission will not be granted where surface development would prejudice the future exploitation of valuable mineral reserves."*
- 4.6 Our client is concerned about the terminology of "will not be granted" this definitive use of language does not allow for any discretion and the ability for planning applications to be considered on a case-by-case basis to take account of the specific circumstances of the area. This could lead to the perverse position whereby abandoned quarries, that are no longer operational, prevent development of lands for the benefit of the local community.
- 4.7 That approach is plainly at odds with the SPPS which, at paragraph 6.152, sets out the following regional strategic objectives to:
- *'facilitate sustainable minerals development through balancing the need for specific minerals development proposals against the need to safeguard the environment; (emphasis added)*
 - *minimise the impacts of minerals development on local communities, landscape quality, built and natural heritage, and the water environment; and*
 - *secure the sustainable and safe restoration, including the appropriate re-use of mineral sites, at the earliest opportunity.'*
- 4.8 Further, at paragraph 6.156 the SPPS directs that:

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'In preparing their LDP councils may also identify areas most suitable for minerals development within the plan area. Such areas will normally include areas of mineral reserves where exploitation is likely to have the least environmental and amenity impacts, as well as offering good accessibility to the strategic transport network.

(emphasis added)

- 4.9 So the LDP should consider the areas most suitable for mineral development, taking account of environmental and amenity impacts among other matters. While the DPS does state that evidence to determine and support the extent of MSAs at LPP stage, the DPS does not set out the criteria that will be applied in defining these areas and it is surely incumbent that the DPS in proposing an operation policy should spell out clearly the basis on which the areas affected will be defined. Before any area is considered a Mineral Safeguarding Area (“MSA”), the onus should be on the owner of the mineral resource to provide clear and unequivocal evidence in respect of the nature, extent and location of the mineral reserves approved for extraction and the value of the reserves to the economy, relative to any likely surface development that would be prejudiced by such a designation.
- 4.10 The DPS does state that consideration is to be given to permitted mineral development and distances to neighbouring development so that new neighbours are not adversely impacted by a mineral extraction site operating within the conditions of its extant planning permission. It needs to go further and clearly state that appropriate weight will be given a failure to comply with planning conditions or other relevant controls where such non-compliance would materially affect prospects of surface development proposals.
- 4.11 Furthermore, we note that Policy MIN 4 refers to “*the future exploitation of valuable mineral reserves*”. The DPS fails to clearly define what is meant by this term and it would appear that ‘*valuable minerals*’ could be open to interpretation. In Policy MIN 3 it is defined as: “*metalliferous or non-metalliferous minerals licensed by the Department for the Economy (DfE) or Crown Estate which are particularly valuable to the economy.*”
- 4.12 Policy that is vague and/or ambiguous is not sound policy.
- 4.13 Our client is concerned the current wording is unduly restrictive and, as outlined above, and requires clarification as to the types of minerals that will be caught by Policy MIN 4.
- 4.14 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. The regional strategic objectives of the SPPS are 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.
- 4.15 Whilst our client supports the overall vision of the DPS and welcomes the social objectives to deliver the vision and in particular, the social objectives which seek to:

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- 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.
 - 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.
- 4.16 The proposed Policy MIN 4 is at odds with these objectives in failing to make provision for a proper balance to be applied. In respect of Carrowdore, as set out in section 3 of this submission, there is a need to at least retain all of the lands currently within the settlement limits. Adoption of Policy MIN 4 as it currently stands would jeopardise the future surface development of our client's lands. That is a situation that could be avoided if the neighbouring quarry fully complied with its required obligations set out in the relevant conditions of the permissions it operates under, and the Council acted to secure compliance with those conditions.
- 4.17 As things stand the DPS is unsound in respect of:
- 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.

5 CONCLUSIONS

- 5.1 The DPS needs to ensure that it provides sufficient land for appropriate development in the right place.
- 5.2 The LDP should, in line with the requirements of the SPPS and the guidance provided by Development Plan Practice Note 1: Introduction: Context for Local Development Plans (DPPN 1) provide a 15-year plan framework and set out a long-term spatial strategy 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.
- 5.3 Ards & North Down Borough is an ageing population and we welcome the intent behind the DPS to address that issue.
- 5.4 Carrowdore and its hinterland demonstrates even more concerning trends than the Borough as a whole in respect of its population profile and the DPS should aim to address that by making provision for more homes for young families.
- 5.5 Almost all of the land within the settlement limit is either already developed and occupied, or in the process of development. There is clearly a need to at least retain the existing land within the settlement. Our clients' lands is part of that mix and offers an appropriate option to accommodate that appropriate growth.
- 5.6 The proposed Policy MIN 4 jeopardises that contribution to the appropriate growth of Carrowdore. The policy needs to be clarified and amended to provide a proper balance in line with the SPPS and indeed the DPS overall strategy and objectives.
- 5.7 We 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.
- 5.8 Our clients wish to be represented in any inquiry process to discuss these matters further.