

Dear Planning Policy Team,

I am writing to submit a formal representation in relation to the Ards and North Down Local Development Plan 2032 – Draft Plan Strategy (DPS), specifically regarding how Millisle is reflected in the strategy and its future growth potential.

## FORMAL REPRESENTATION

### 1. Introduction

I am submitting this representation under the statutory consultation for the Draft Plan Strategy (DPS) for the Ards and North Down Local Development Plan 2032. My comments relate to whether the DPS accurately reflects the development capacity, housing need and strategic role of Millisle.

This representation should be read in the context of the published Draft Plan Strategy and its supporting technical documents:

DPS Webpage:

<https://www.ardsandnorthdown.gov.uk/article/2662/Ards-and-North-Down-Local-Development-Plan-2032---Draft-Plan-Strategy>

DPS Document List / Technical Supplements:

<https://www.ardsandnorthdown.gov.uk/article/2650/Draft-Plan-Strategy>

### 2. Housing Evidence and Development Potential Consistency Test C4

The Council's Housing Land Availability Reports consistently show that Millisle retains one of the highest levels of remaining development capacity in comparable settlements within the Borough. This evidence directly contradicts the impression conveyed within the DPS that Millisle may be constrained or limited in its ability to accommodate further housing growth. The evidence-base demonstrates that the village is well positioned to contribute meaningfully to housing supply over the plan period and this should be reflected more clearly within the strategy.

Housing Land Availability Reports (Council website):

[https://www.ardsandnorthdown.gov.uk/media/2013/Housing-Land-Availability-Report-2024/pdf/50Housing\\_Land\\_Availability\\_Report\\_2024.pdf?m=1733836865497&utm](https://www.ardsandnorthdown.gov.uk/media/2013/Housing-Land-Availability-Report-2024/pdf/50Housing_Land_Availability_Report_2024.pdf?m=1733836865497&utm)

Despite this clear monitoring evidence, the DPS does not adequately reflect Millisle's identified capacity or potential role in meeting housing needs. This indicates a failure to properly have regard to relevant plans, evidence and monitoring information, contrary to Consistency Test C4.

### 3. Community Plan Objectives Consistency Test C2

The Council's Community Plan seeks to promote thriving, balanced and sustainable communities. Restricting housing growth in Millisle risks:

- An ageing population profile
- Reduced opportunities for young people and families to remain in the village
- Decline in demand for local services, schools and businesses

The Draft Plan Strategy does not explain how these Community Plan objectives will be achieved in Millisle without accommodating an appropriate level of new housing, therefore failing Consistency Test C2.

### 4. Robust Evidence Base and Justification Coherence and Effectiveness Test CE2

The conclusion that Millisle does not require additional housing is not supported by a sufficiently robust, settlement-specific evidence base. In particular, the Draft Plan Strategy does not adequately address:

- Local housing demand, including demand from young families and downsizers
- The role of housing in sustaining local services and facilities
- The availability of land within or adjacent to the settlement capable of accommodating sensitive, proportionate growth
- Infrastructure capacity constraints, supported by clear and transparent evidence rather than assumed limitations

Without a clear and transparent evidence base specific to Millisle, the housing position appears precautionary rather than justified. The DPS fails CE2 by not demonstrating that the housing strategy for Millisle is realistic, appropriate or founded on robust local evidence.

### 5. Recent Development Success in Millisle Coherence and Effectiveness Test CE3

Millisle has recently accommodated new housing development successfully, with schemes integrating well into the existing settlement and contributing positively to services, amenities and local regeneration. These developments demonstrate that Millisle is capable of delivering sustainable growth in a manner that respects local character while supporting community vitality.

This positive delivery record is not sufficiently acknowledged within the DPS. Given the emphasis placed on deliverability and implementation, Millisle's proven ability to accommodate development directly supports compliance with Coherence and Effectiveness Test CE3.

6. Millisle Village Plan (2025–2035)  
Consistency Test C4

Millisle is subject to a Council-backed Village Plan currently in preparation through community consultation:

Millisle Village Plan 2025–2035:

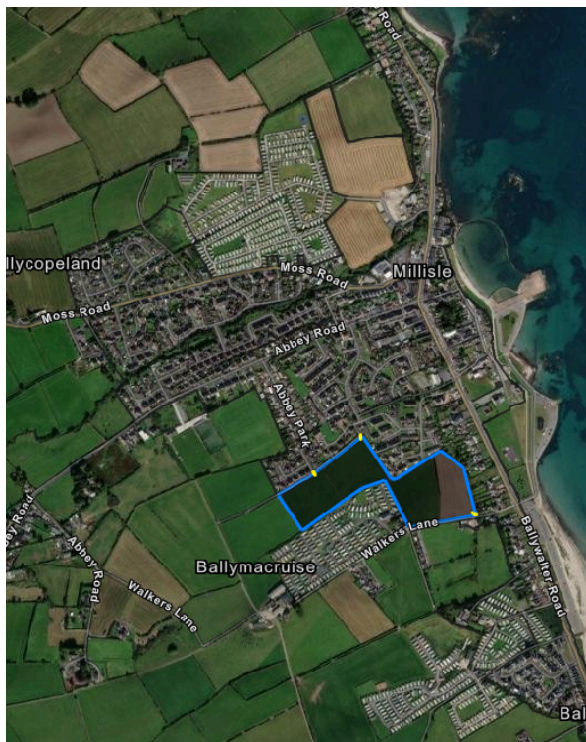
<https://engage.ardsandnorthdown.gov.uk/regeneration/millisle-vp-2025-35/>

This emerging plan sets out local intentions for growth, regeneration and infrastructure improvement. However, it does not yet appear to be fully acknowledged or integrated into the DPS. Recognition of its findings would ensure alignment with community-led priorities and broader Council strategy.

Failure to properly align the DPS with this emerging Council-led plan risks a disconnect between strategic planning policy and community-led regeneration objectives, contrary to Consistency Test C4.

7. Land Ownership and Site Information

I confirm that I own land in Millisle. In the map below I have outlined in blue four adjoining fields ideal for development with three potential access points marked in yellow. The land directly adjoins existing residential development and a caravan park and lies alongside the current village planning boundary. It therefore represents a logical, sustainable and deliverable opportunity for future growth and could contribute positively to the village's expansion and housing targets.



### Reservation of Site-Specific Representation

I reserve the right to submit a detailed, site-specific representation at the Local Policies Plan stage should the Council proceed on the current basis.

### Conclusion

For the reasons set out above, the Draft Plan Strategy does not accurately or fairly reflect Millisle's demonstrated development capacity, housing need or strategic role within the Borough. The evidence base, including the Council's own monitoring information, recent successful delivery and emerging community-led planning, clearly indicates that Millisle is capable of accommodating an appropriate level of sustainable growth over the plan period.

I therefore request that the Council revisits its approach to Millisle within the Draft Plan Strategy, ensures full compliance with the relevant Consistency, Coherence and Effectiveness Tests, and amends the strategy to properly recognise Millisle's capacity to contribute to meeting housing needs while supporting balanced community growth, local services and long-term vitality.

Please confirm receipt of this representation and advise on the next steps.

Yours faithfully,

Robert Boyle

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Dear Planning Policy Team,

Following the recent publication of the Rural NI: Our New Approach 2026-2041 Public Consultation Document and the Reaching Rural 2021-2025 Final Progress Report, I would like to add the following to my formal representation in relation to the Ards and North Down Local Development Plan 2032 – Draft Plan Strategy (DPS), emailed on 12<sup>th</sup> February 2026.

I believe the Ards and North Down Local Development Plan 2032 – Draft Plan Strategy (DPS) fails to meet the soundness tests set out in the Department for Infrastructure's *Development Plan Practice Note 6 – Soundness (May 2017)*. In particular, the plan does not adequately address the need for housing in rural areas and villages and therefore fails key tests relating to consistency, evidence and effectiveness.

Evidence from both of the above publications from the Northern Ireland Housing Executive (NIHE) and the Department of Agriculture, Environment and Rural Affairs (DAERA) demonstrates that there is significant and increasing demand for housing in rural communities, yet the Development Plan does not provide an adequate strategy to address this need.

### **1. Failure of Consistency Test C3**

#### **(Has the plan taken account of regional policy and guidance issued by the Department?)**

The Development Plan must take account of relevant regional strategies, policy, and evidence. However, the plan appears inconsistent with evidence from the Reaching Rural 2021-2025 Final Progress Report and the plans in the Rural NI: Our New Approach 2026-2041 Public Consultation Document.

The NIHE *Reaching Rural 2021–2025 Final Progress Report* clearly identifies increasing demand for rural housing:

- Demand for new rural homes has increased during the strategy period (page 3).
- The rural housing waiting list increased from 6,630 households in March 2022 to 7,366 households by March 2025 (page 11).
- Households in housing stress increased from 4,243 to 5,211 during the same period (page 11).

These figures demonstrate a significant and growing level of unmet housing need in rural areas.

The DAERA consultation document *Rural NI: Our New Approach 2026–2041* also emphasises the importance of sustaining rural communities and ensuring rural areas remain places where people can live and work:

- The strategy highlights the need to support thriving and sustainable rural communities (page 12).
- It emphasises creating rural areas where people want to live, work and be active (page 15).
- Villages are identified as important social and economic hubs within rural areas (page 21).

Despite this clear policy direction and evidence base, the Development Plan does not sufficiently facilitate housing growth in villages and rural settlements.

As a result, the plan appears inconsistent with regional policy objectives and the available evidence, undermining its compliance with Soundness Test C3.

## **2. Failure of Coherence and Effectiveness Test CE1**

### **(Is the plan founded on a robust and credible evidence base?)**

A sound development plan must be supported by a robust and credible evidence base.

The evidence produced by the Housing Executive in the Reaching Rural 2021-2025 Final Progress Report clearly demonstrates a growing demand for housing in rural areas:

- Rural housing waiting lists have increased significantly (page 11).
- Housing stress continues to rise among rural households (page 11).
- Housing Needs Tests carried out in villages frequently reveal hidden demand for housing (page 12–13).

In addition, the *Rural NI: Our New Approach 2026-2041* Public Consultation Document published by DAERA highlights the need to maintain viable rural populations to support communities and services:

- Rural areas require sufficient population to sustain services and infrastructure (page 24–29).
- Supporting population growth is essential to maintain vibrant rural communities and economies (page 24–29).

Despite this evidence, the Development Plan does not appear to adequately reflect the identified demand for rural housing or explain how this demand will be addressed.

This indicates that the plan's strategy is not sufficiently justified by the evidence base and therefore fails Soundness Test CE1.

### **3. Failure of Coherence and Effectiveness Test CE2**

#### **(Is the strategy deliverable and capable of implementation?)**

A development plan must provide a deliverable strategy capable of meeting development needs throughout the plan period.

However, the available evidence published in the Reaching Rural 2021-2025 Final Progress Report suggests that current housing supply is insufficient:

- Annual rural housing allocations recorded by the Housing Executive are relatively limited, ranging from 786 to 810 homes per year between 2021 and 2025 (page 11).
- This level of delivery is significantly lower than the total number of households on the rural waiting list (page 11).

Without identifying sufficient opportunities for housing growth in villages and rural settlements, it is unclear how the Development Plan will meet the increasing demand identified in the Housing Executive evidence.

The DAERA strategy, Rural NI: Our New Approach 2026-2041 Public Consultation Document also emphasises the importance of maintaining viable rural communities by enabling people to live within rural areas:

- Rural policy aims to ensure communities remain sustainable and inclusive places to live (page 15).
- Maintaining population levels is critical to supporting services, economic activity, and community life (page 24–29).

Without allowing appropriate housing development in villages, the plan cannot realistically deliver these objectives.

This raises serious concerns regarding compliance with Soundness Test CE2, as the strategy does not demonstrate that it can deliver sufficient housing to meet identified needs.

#### **4. Failure to Support Sustainable Rural Communities – CE3**

##### **(Soundness Test CE3: Does the plan contribute to creating sustainable, inclusive, and balanced communities?)**

The failure to provide adequate housing opportunities in villages risks significant negative impacts on rural communities and demonstrates that the Development Plan does not meet CE3. Evidence from Reaching Rural 2021-2025 Final Progress Report and the plans in the Rural NI: Our New Approach 2026-2041 Public Consultation Document highlight that maintaining viable rural populations is essential for sustaining communities.

- Rising housing stress and waiting lists show that many households cannot access suitable homes in rural areas (Reaching Rural 2021-2025 Final Progress Report page11).
- Housing Needs Tests in villages continue to reveal previously unrecognised demand, demonstrating that existing supply is insufficient to meet rural need (Reaching Rural 2021-2025 Final Progress Report page 12–13).
- DAERA rural policy emphasises that maintaining population levels is critical to supporting local services, schools, shops, transport, and overall community life (Rural NI: Our New Approach 2026-2041 Public Consultation Document page 24–29).

Without additional housing development in villages, rural areas are at risk of:

- Increasing housing pressures, with households unable to secure suitable homes.
- Population decline, undermining the long-term sustainability of communities.
- Reduced access to services, as population levels fall below what is needed to support schools, shops, and transport.
- Loss of younger and working-age residents, who may be forced to leave due to lack of housing, leaving ageing and unsustainable communities.

In summary, by failing to provide sufficient housing opportunities in villages, the Development Plan does not support the creation of sustainable, inclusive, and balanced rural communities, in direct conflict with Soundness Test CE3.

## **Conclusion**

For the reasons outlined above, the Development Plan fails to meet several of the soundness tests set out in the Department for Infrastructure's Development Plan Practice Note 6, particularly:

- Consistency Test C3 – failure to adequately take account of regional policy and housing evidence.
- Coherence and Effectiveness Test CE1 – the strategy is not sufficiently justified by the available evidence.
- Coherence and Effectiveness Test CE2 – the plan does not demonstrate a deliverable strategy for meeting rural housing need.

Both the evidence from Northern Ireland Housing Executive and plans from DAERA's rural policy demonstrate that demand for housing in rural areas is increasing and that sustaining rural communities requires appropriate housing provision in villages and settlements.

In light of this evidence, the Development Plan should be reconsidered and amended to allow appropriate housing development in rural villages and settlements, in particular in Millisle, ensuring that it properly reflects the identified housing need and complies with the required soundness tests.

Yours faithfully,

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