

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)

Ms Claire Ferris

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)

See below

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)

See attached report

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 adjacent Moss Road, Millisle



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

2.0 THE PLAN PERIOD

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

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

3.0 MILLISLE IN THE SETTLEMENT HIERARCHY

Spatial Growth Strategy & Settlement Hierarchy

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

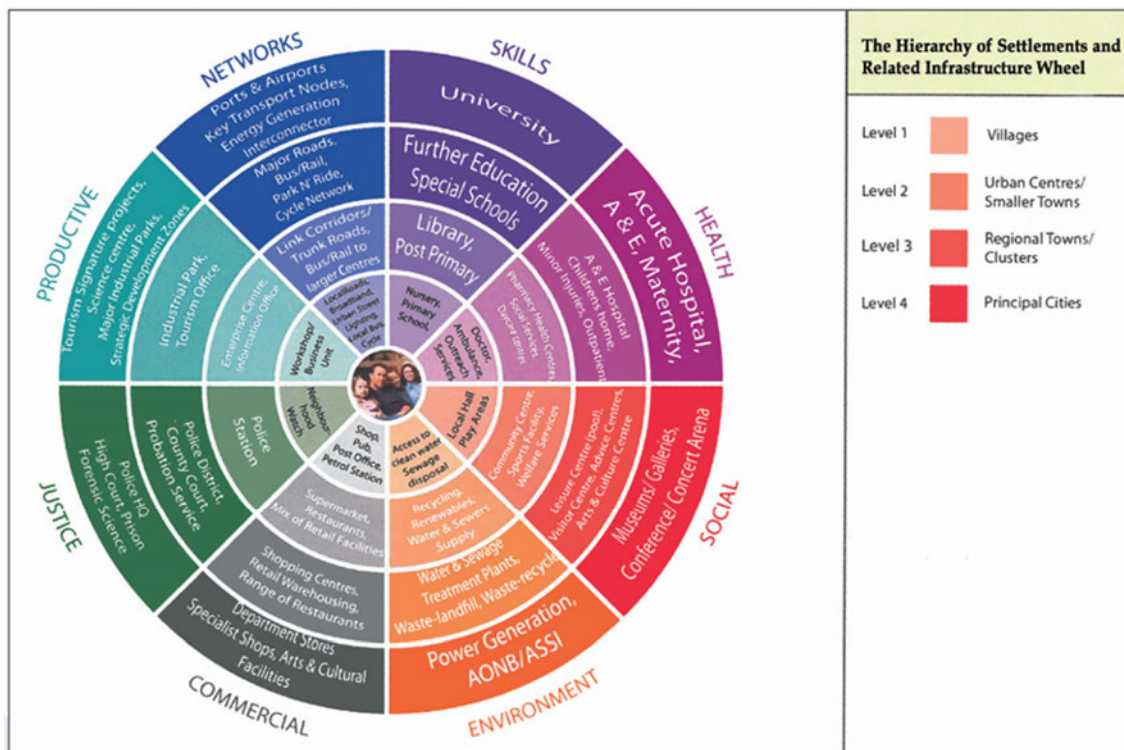


Figure 1: RDS Hierarchy of Settlements and Related Infrastructure Wheel

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

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

Infrastructure Group	Tier 2 – Local & Small Towns	Commentary
Skills	Library, Post Primary	Primary school & Nursery Unit
Health	Pharmacy, Health Centre, Social Services, Day Care Centre	Pharmacy, physiotherapy/massage therapy practice.
Social	Community Centre, Sport Facilities, Welfare Services	Community Hub & Millisle Regeneration Charity, several Churches & cemetery within settlement limits, community centre, orange hall, play parks, sports pavilion & playing pitch – Abbey Villa FC. Public toilets and car parks
Environment	Recycling, Renewables, Water & Sewer Supply	Council Recycling centre & bins. Capacity at N. Down WWTW.
Commercial	Supermarkets, Restaurants, Mix of Retail Facilities	5 Caravan parks Credit Union, Petrol filling station, Post Office, convenience & hardware stores, numerous public houses, restaurants/cafes, fast food outlets, charity shops, hairdressers, beauty salon, bookmaker, butcher, ice cream parlour and gift shops.
Justice	Police	PSNI station closed – in line with practice in many local towns across the region.
Productive	Enterprise Centre, Information Office	No employment zoning. However, strong tourist economy, numerous small businesses & active community regeneration group.
Networks	Link Corridors, Trunk Roads, Bus/Rail to Larger Centres	Strategic location on A2 providing connections to Donaghadee, Newtownards, Bangor, Groomsport, Ulster Hospital & Belfast. Main bus route to/from Belfast, as well as connection to bus station in Newtownards.

Table 1: Millisle: Comparison with RDS Small Towns Infrastructure Parameters

- 3.5 The RDS Spatial Framework sets the context for determining future development priorities. The role of settlements located on key transport corridors and link corridors is a significant consideration in assessing the growth potential of a settlement as enhanced accessibility

between the critical mass together with the settlement own services/employment/residential offer reduces the need to travel, encourages sustainable movement choices, makes efficient use of infrastructure and resources, as well as successfully and sustainably integrating new employment and residential development uses, all of which are aspirations within the RDS. The location of a settlement along a link corridor provides it with an advantage in terms of its role and its growth potential, which embodies the ‘*forward perspective*’ envisaged by the RDS.

3.6 Millisle has a strong existing population base of 2,561 (2021 census) and is the largest village in the Borough, exceeding the NISRA population threshold (2,499) for the classification of a village (Band G) as confirmed in the Appendix 3 of the Settlement Hierarchy & Settlement Evaluation Technical Supplement 1. There has been a 10.4% increase over the population recorded for Millisle in the 2011 census (2318) which is significant.

3.7 As demonstrated in Table 1 above, Millisle already provides its residents and the surrounding hinterland with most of the services expected to be supplied by a small town as set out in the RDS Infrastructure wheel. Notably the RDS makes it clear that:

“The wheel provides a forward perspective, providing some understanding of the level of facilities and services anticipated at different spatial levels rather than necessarily reflecting the stock of services that are currently available in villages, towns, cities or regionally..... access to services and facilities is important. Creating a critical mass to support a level of services raises challenges for service providers in meeting the needs of spatially dispersed populations” (emphasis added).

3.8 The DPS approach relies on the existing service provision as the determining factor in allocating settlements their position in the settlement hierarchy. The rigid application of that approach does not reflect the ‘*forward perspective*’ required in the RDS and the emphasis on ‘*the level of facilities and services anticipated at different spatial levels rather than necessarily reflecting the stock of services that are currently available in villages.*’

3.9 The DPS ought to have given consideration to categorising Millisle as a small town on the basis of its population size, alongside the need for such a settlement along the east coast of the Ards Peninsula in acknowledgement of the relative isolation of the Peninsula residents from appropriate services and the travel distance between settlements such as Portavogie, Ballyhalbert, Ballywalter and numerous small settlements to the nearest town. The failure to consider designating Millisle as a small town is contrary to the RDS provisions and it is therefore unsound in the following respects:

- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
- 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 its own evidence base.

4 DPS HOUSING STRATEGY

Spatial Growth Strategy & Strategic Housing Allocation

- 4.1 We welcome the DPS Strategic Objectives, and particularly the Spatial & Cross-cutting and Social Objectives to:
- Promote sustainable growth in the right places and at the appropriate level, to meet the needs of all those who live, work, visit and invest in the Borough.
 - To create sustainable places throughout the Borough through design, layout and mix of uses that enhance the character and identity of settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote prosperity, and well-being of citizens.
 - To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.
 - To create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.
 - To support rural communities by providing appropriate and sustainable opportunities for development in the countryside.
 - To build sustainable resilient communities where people have good access to housing, employment, shops, public transport, active travel, healthcare, community and cultural facilities.
 - To improve health and wellbeing - by facilitating health, education, community and cultural facilities in accessible locations and creating places that encourage a healthy lifestyle through the provision of high-quality open space and sporting facilities, informal leisure spaces and increase opportunities to walk, wheel, or cycle.
- 4.2 Further, the Spatial Growth Strategy set out under SGS 1 merits support and in the context of this submission, and without prejudice to our position on the need to re-consider the position of Millisle in the settlement hierarchy, we particularly welcome the objective to:
- Sustain and maintain the diversity and quality of our villages by encouraging local development which supports the population and services of local communities.
- 4.3 We agree that the focus of growth and the need to direct new development is directed to the most appropriate places and that the scale of development for any given settlement should be commensurate with the capacity of that settlement to support it which will also capitalise on the benefits arising from the efficient use of existing community facilities, services and infrastructure in the villages that benefit from a strategic location on key transport corridors.
- 4.4 We also support the employment-led housing growth strategy as an appropriate approach to the calculation of the level of housing needed to support the job creation targets. However, in the context of our position in respect of the appropriate plan period set out in section 2 of this submission, we are strongly of the view that the number of new homes should be extrapolated upwards to apply to a more appropriate plan period.
- 4.5 The Strategic Housing Allocation proposed for the villages is 1,265 units of which 1,076 is taken up by 'existing commitments' and a further 690 units allocated against predicted windfall allowance. That scenario would leave the 16 settlements proposed as villages with an oversupply of housing.

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- 4.6 One of the 8 stated aims of the RDS is to support our towns and villages and rural communities to maximise their potential: *“Our rural areas including our towns and villages have a key role in supporting economic growth. They offer opportunities in terms of their potential for growth in new sectors, the provision of rural recreation and tourism, their attractiveness as places to invest, live and work, and their role as a reservoir of natural resources and highly valued landscapes.”* Therefore, in that context, while acknowledging the need to grow the population of hubs and clusters (SFG12), the RDS also emphasises (SFG13) the importance of sustaining rural communities living in smaller settlements and the open countryside as the distinctive settlement pattern of main and small towns, villages and dwellings in the open countryside is unique within these islands. *“The rural community is the custodian of our exceptional natural and built environment. In rural areas, the aim is to sustain the overall strength of the rural community living in small towns, villages, small rural settlements and the open countryside.”*
- 4.7 The SPPS states that, in order to maintain and enhance the attractiveness of the countryside as a place to invest, live and work, the countryside requires a sustainable approach to new development, consistent with the RDS. The RDS recognises that to sustain rural communities, new development and employment opportunities are required which respect local, social and environmental circumstances. Facilitating development in appropriate locations is considered necessary to ensure proposals are integrated appropriately within rural settlements or in the case of countryside locations, within the rural landscape.
- 4.8 The SPPS also stresses that Government policy recognises the wide variations in the economic, social and environmental characteristics of rural areas and requires that policy should be tailored to reflect these differences, be sensitive to local needs and sensitive to environmental issues, including the ability of settlements and landscapes to absorb development.
- 4.9 While it is acknowledged that the Council have confirmed that the allocations set out under SG 5 is an indicative strategic allocation for settlements and that more detailed analysis will take place at Local Policies Plan stage, a blanket approach that concludes there is already an over provision in existing villages and doesn’t take proper account of the varying needs of different areas within the Borough, will fail to deliver a sustainable approach to the direction of development.
- 4.10 The Housing Land Availability Report 2025 which is part of the evidence base for the DPS and subsequent LDP documents concludes that there are 8.18ha of undeveloped housing land within the settlement limits of Millisle. That conclusion does not appear to reflect the reality on the ground and significantly over-estimates the housing potential within the settlement limits.
- 4.11 Lands around the lands previously designated as HPA 3 are already developed for housing or form part of an operational caravan park as shown in Figure X below:



Figure 2: Lands Around HPA 3 Designation

4.12 Lands to the east of Ashley Crescent that are within the settlement limit and, as yet undeveloped, form part of the Mill Caravan Park as outlined in red on Figure 3 below.



Figure 3: Potential Development Lands in North Millisle

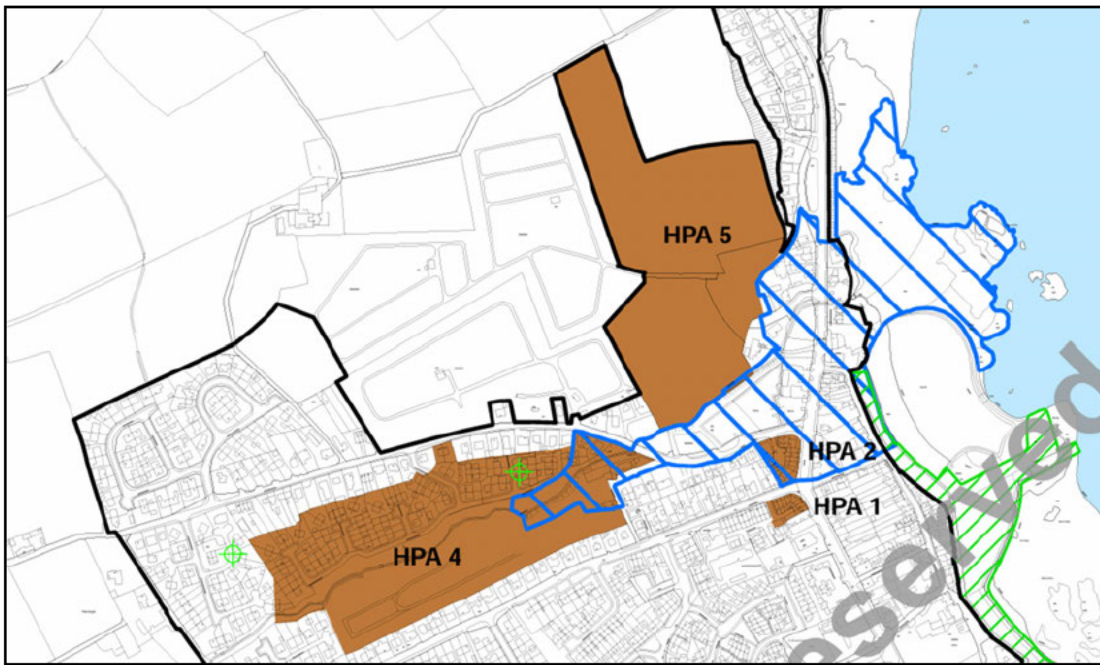


Figure 4: Extract from Ards & North Down 2015 – North Millisle

4.13 Notably the lands zoned for housing in HPA 1 & HPA 2 were developed around 2003 and the HPA 4 zoning was developed between 2010 & 2016. The only remaining undeveloped zoned

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housing lands are those that fall under the HPA 5 designation. However, these lands appear to be sterilised in that they were included in the previous Area Plan – the North Down & Ards Area Plan 1984-1995 (Figure 5 below). That Area Plan, at paragraph 36.3 recognised that there could be difficulties in developing those lands:

“To provide for future expansion of Millisle lands lying generally to the west of the village have been incorporated within the proposed development limits. An important constraint in identifying an appropriate limit has been the need to protect valuable agricultural land. At Moss Road, Abbey Road and Abbey Park lands which are readily accessible should cope with expected growth over the Plan Period. However, other sites within the proposed limit are considered suitable for residential purposes but have access difficulties; it is hoped that these areas will be freed for development thus allowing a more flexible strategy for Millisle.”

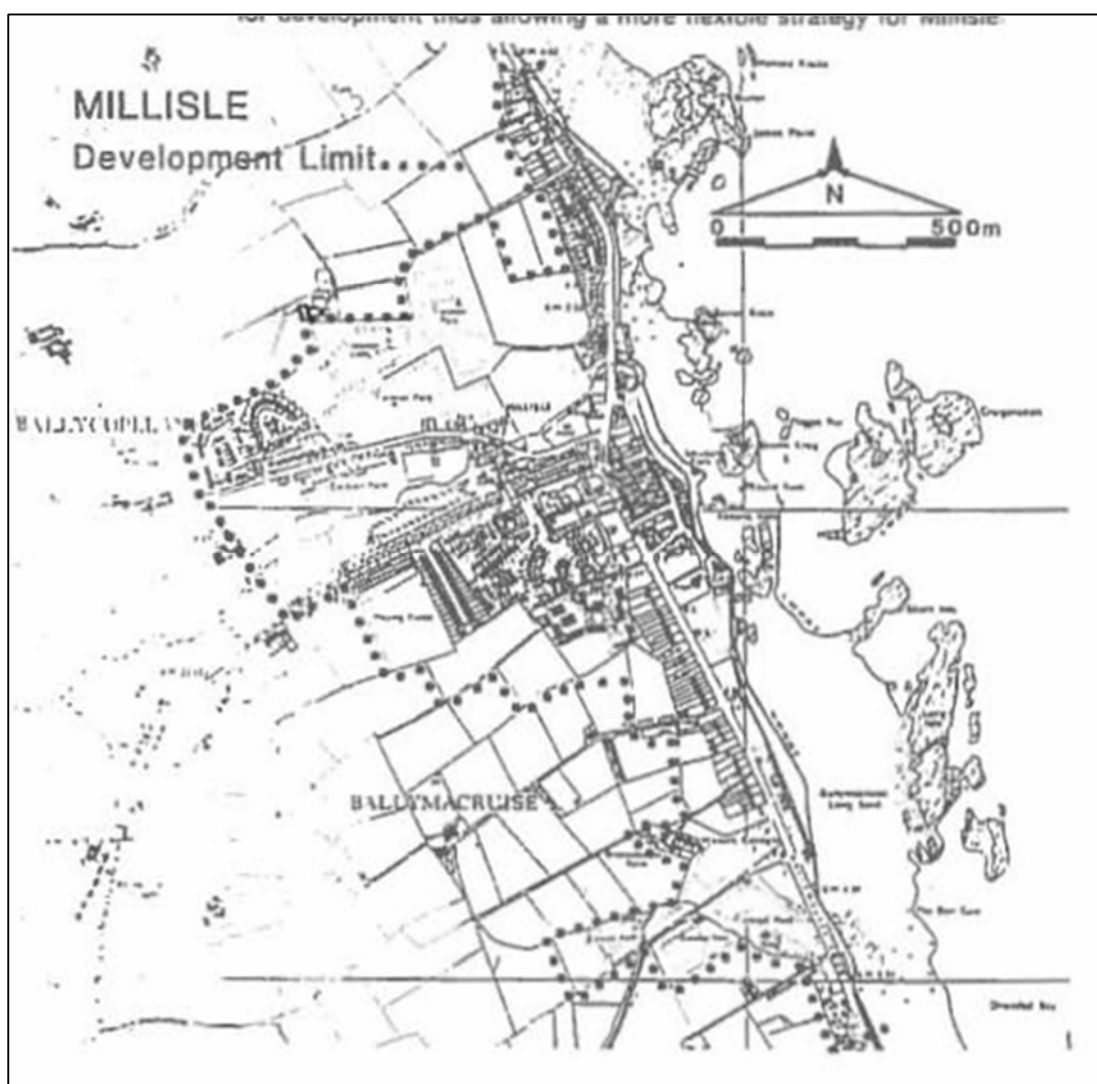


Figure 5: North Down & Ards Area Plan 1984-1995.

- 4.14 There is clearly a need for the DPS to make provision for appropriate growth in the Ards Peninsula generally and in Millisle, in particular, if the LDP is to fulfil its role of delivering sustainable rural communities and the sizeable population of Millisle can be supported with an

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appropriate level of services. That position is supported by local estate agents (see Appendix 2) who have confirmed that there is a strong and ongoing demand for affordable homes for first time buyers in Millisle and the surrounding villages.

- 4.15 Our clients' lands (Appendix 1) are well positioned along the Moss Road, where, in agreement with the Area Plan 1984-95, the lands are readily accessible and tie in well with the existing form of the settlement.



Figure 6: Subject Lands.

- 4.16 The subject lands are reasonably level and would blend in readily with the urban fabric as they already benefit from a footpath and street lights provision along the road frontage. At paragraph 2.24 the DPS states that:

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

- 4.17 In that context increased provision at Millisle on the subject lands would assist in meeting the LDP objectives in that:

- It would open up capacity to provide for a proportionate mix of housing type, size and tenure in an accessible location with good transport links to other key towns in the Borough as well as having strong public transport connections with those towns and beyond.
- An appropriate allocation close to existing residential areas within the settlement would provide for the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities and maintain their existing connections, while still enabling relatively independent living.
- It would promote integration between transportation and new development to reduce the need to travel and reduce dependency upon travel by car.
- It would provide opportunities for sustainable travel including walking, cycling and public transport and reduce the need to travel by private car.

- 4.18 The approach to the proposed allocation, while in broad terms following the approach of the RDS and SPPS, does not take appropriate account of the situation at each settlement with

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regard to their scale, location in respect of other settlements and main transport corridors, current and future role, both individually and as part of potential clusters, and environmental considerations. The allocation for Millisle is inadequate and doesn't reflect the role that the settlement can play in delivering on the RDS and LDP objectives due to its particular location and relationship with the wider district and beyond. In that context the DPS is unsound in respect of:

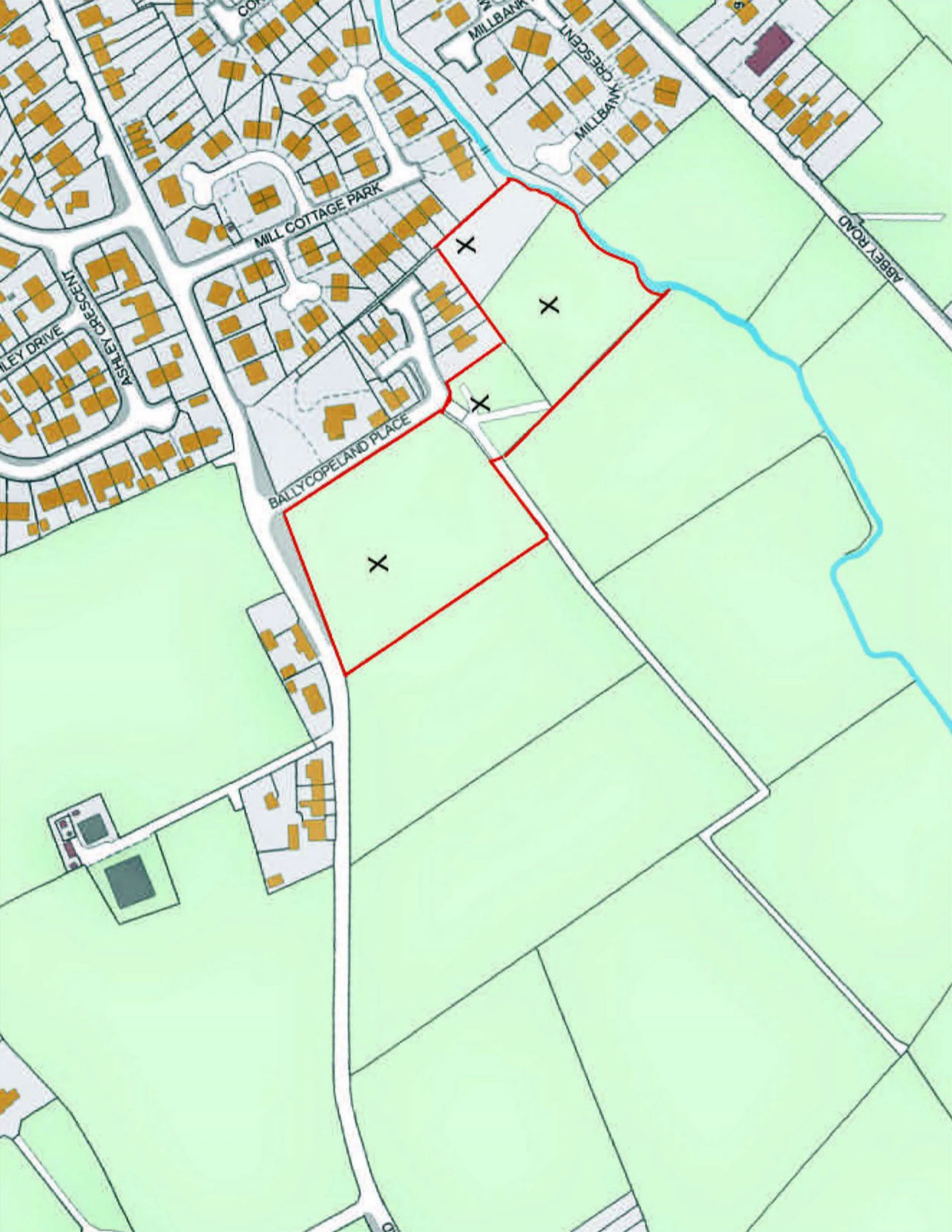
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
- Consistency Test C3 - it fails to take proper account of policy and guidance issued by the Department, namely the SPPS
- Coherence & Effectiveness Test CE2 - it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

5.0 CONCLUSIONS

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



Appendix 1: Subject Lands





Appendix 2: Additional Supporting Information

To Whom It May Concern,

I confirm that there is a clear demand for moderately priced modern homes in the Millisle area, which is currently not being met due to non-development of zoned land by the landowners.

I also confirm that we would support the inclusion of lands at or adjacent to the Moss Road, Millisle, and believe there is a clear and established demand for such housing in this location.

Yours faithfully,

Kind Regards
Tim Martin FRICS



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Our Saintfield Office is Now Open. Tel: 028 97568300 or visit our website www.timmartin.co.uk



SUBJECT TO CONTRACT AND WITHOUT PREJUDICE