Local Development Plan 2032 Technical Supplement 11

Coastal Management



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1.0 INTRODUCTION

Purpose of this document

- 1.1 This technical supplement is one of a number of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan (LDP) draft Plan Strategy 2032. This suite of documents should be read alongside the policies contained within the draft Plan Strategy, in order to understand the rationale and justification for each policy.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents which will be issued through the LDP process. The POP outlined the vision and strategic objectives of the plan based upon the baseline information detailed in a suite of position papers. The technical supplements which complement the draft Plan Strategy will build upon the baseline information gathered in the position papers and show how this has been progressed through the LDP process to formulate the draft Plan Strategy.
- 1.3 This technical supplement builds upon and updates the Coastal Management position paper and, along with the full suite of technical supplements, topic papers and associated documents, sets out the evidence base that has formulated the coastal management policies in the draft Plan Strategy. Public consultation processes and engagement with elected members have also been taken into account. It should be noted that this is based upon the best information available at the time of compiling this technical supplement paper. Amendments may be required as new data becomes available or as a result of any changes in policy or guidance.

Planning and the Coast

At a length of 115 miles, the coastline of Ards and North Down Borough is one of the longest in Northern Ireland, consisting of Belfast Lough to the north, the Irish Sea to the east and Strangford Lough with its associated islands forming the internal coastline of the Ards Peninsula. These areas provide nationally and internationally significant coastal habitats for birds and wildlife including mudflats, coastal saltmarsh, sandy beaches, boulder and rocky shores and are protected by numerous nature conservation designations. Furthermore, a significant proportion of the Boroughs' population resides in 17 coastal settlements (refer to map at Appendix A.) The coast also presents a valuable recreational and tourism resource for activities such as walking, sailing, motorsports and fishing.

1.5 Our coastline is under pressure from various types of development including residential schemes, coastal industry and recreation. At the same time, the natural processes of shoreline change including erosion and land instability present further challenges for existing and proposed coastal developments. The planning system and in particular the LDP, has a key role in the identification of opportunities for appropriate development along the coastline, whilst also protecting those areas of the coast that are unsuitable for development due to their amenity, nature conservation or landscape value.

2.0 REGIONAL POLICY CONTEXT

Programme for Government 2024-2027

2.1 The Northern Ireland Executive has agreed upon the Programme for Government (PfG) 2024-2027 'Our Plan: Doing What Matters Most.' The PfG sets out the Executive's priorities for making a difference to people's lives; comprising nine immediate priorities and three long-term missions of people, planet and prosperity, with a cross-cutting commitment to peace.

Draft Programme for Government 2016-2021

2.2 The previous draft Programme for Government 2016-2021 was the most up to date expression of the highest level of policy from the Northern Ireland Executive during much of the preparation of the draft Plan Strategy.

It set out 14 strategic outcomes, some of which had implications for coastal management, particularly 'We live and work sustainably – protecting the environment.'

Draft Programme for Government Outcomes 2021

2.3 The NI Executive consulted on a new Programme for Government in 2021 that aimed to bring a new focus to deliver lasting, real and positive change in people's lives, reflecting the messages contained in 'New Decade New Approach'. The draft Framework contained nine strategic Outcomes which, taken together, set a clear direction of travel for the NI Executive and provided a vision for the future of all citizens.

Regional Development Strategy 2035

- 2.4 The Regional Development Strategy (RDS) provides an overarching strategic planning framework to facilitate and guide future development throughout Northern Ireland, including the marine area.
- 2.5 Regional Guidance (RG) 9 seeks to 'Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality'. The aim of this guidance is to minimise development in areas at risk from flooding from rivers, the seas and surface water run-off. This recognises that the protection and extension of ecosystems and habitats that reduce or buffer the effects of climate change can aid adaptation. The RDS suggests that a precautionary approach to development in areas of flood risk should be utilised using the latest flood risk data that is available.
- 2.6 RG11 emphasises that our environment is one of our most important assets. It specifically references the need to protect, enhance and manage the coast. Coastal areas need to be protected from coastal squeeze and loss of distinctive habitats and can be utilised in our adaptation to climate change. The Marine Policy Statement (MPS) 2011 and the Draft Marine Plan will provide spatial guidance and detailed policy where appropriate, for the marine, coastal and terrestrial interface and environs. This will be complemented further by work to advance Integrated Coastal Zone Management.
- 2.7 The Spatial Framework Guidance (SPG) section of the RDS 'Belfast Metropolitan Urban Area' highlights that Bangor has future development potential centring around its modern marina and creating activities around the promenade area. SPG-5 also recognises the need to protect areas of high scenic value within the Belfast Metropolitan Area such as undeveloped coastline and Belfast Lough as a means to secure benefits to the economy and society.

Strategic Planning Policy Statement for Northern Ireland

2.8 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. It states that coastal development needs to be integrated into the preparation of the LDP. The LDP should identify areas within coastal settlements or other parts of the developed coast where opportunities exist for the enhancement or

- regeneration of urban waterfronts. The LDP should also acknowledge that some developments require a coastal location such as ports, marinas and some recreational projects and make appropriate provision for these.
- 2.9 Conversely, the LDP should also identify coastal areas of high amenity or landscape value, nature or conservation interest or historical/archaeological importance where development should be restricted. Areas of coast known to be at risk from flooding, coastal erosion or land instability will be highlighted to ensure that new development is not permitted in these locations.
- 2.10 The SPPS states that the following strategic policy must be taken into account in the preparation of LDPs and in the determination of planning applications:
 - The undeveloped coast will rarely be an appropriate location for new development. Where new development requires a coastal location, it must normally be directed into coastal settlements and other parts of the developed coast;
 - Development should only be permitted on the undeveloped coast where
 the proposal is of such national or regional importance as to outweigh any
 potential detrimental impact on the coastal environment and where there is
 no feasible alternative site within an existing urban area in the locality;
 - Within the developed coast, areas of amenity value and areas or features designated for their importance to archaeological, built or natural heritage, should be protected from inappropriate development;
 - Within the developed coast there will be a presumption in favour of development that promotes the enhancement and regeneration of urban waterfronts:
 - In considering development proposals within the developed or undeveloped coast, attention must be paid to the retention of existing public accesses and coastal walkways. Development that would result in the closure of existing access points or the severing of routes will normally only be acceptable where a suitable alternative is provided;
 - Proposals to extend access to the coastline or for the provision of associated facilities such as pathways or picnic areas, should not impact adversely on the nature conservation, archaeological/built heritage, geological or landscape value of the area;
 - Development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability.

The Marine and Coastal Access Act 2009

2.11 The Marine and Coastal Access Act 2009 introduced a revised system of marine management and licensing, including Marine Planning. It consists of

eight key elements which include the establishment of a strategic marine planning system, marine nature conservation, coastal access and marine enforcement.

The Marine Strategy Regulations 2010

2.12 The Regulations require the UK to take the necessary measures to achieve or maintain Good Environmental Status (GES) through the development of a UK Marine Strategy. The UK Marine Strategy Parts One, Two and Three, set out a comprehensive framework for assessing, monitoring and taking action across our seas to achieve the UKs shared vision for 'clean, healthy, safe, productive and biologically diverse ocean and seas.' Part One was published in 2019, updated Part Two was published in March 2021. Part Three was finalised in January 2025.

An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026

2.13 This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict.

The Marine Act (NI) 2013

2.14 The Marine Act (NI) 2013 includes duties to protect and enhance the marine area. The main provisions of the Act are to prepare and adopt a marine plan for the Northern Ireland inshore region and to develop an improved method of managing the rich natural heritage within the marine environment.

Draft Marine Plan for Northern Ireland

- 2.15 The Marine Act (NI) 2013 introduces a new system of marine planning for the Northern Ireland Marine area. Public consultation on the draft Marine Plan took place between April and June 2018. It is intended that, when adopted, the Plan will inform and guide the regulation, management, use and protection of the marine area. In its draft form, the Plan is a material consideration for any planning applications which affect or may affect the marine environment.
- 2.16 The SPPS emphasises how the LDP and the Marine Plan for Northern Ireland need to be compatible with each other. The need for conformity stems from the fact that the terrestrial planning system and the marine planning and licensing system are legally and functionally separate but overlap in a spatial sense (See Figure 1 below). Section 8 of the Marine Act (NI) states that all planning decisions that might affect the UK Marine area must do so in accordance with the Marine Plan (once adopted). This places an onus upon

the planning authority to work closely with the relevant marine departments to ensure that the LDP and the Marine Plan are complementary.

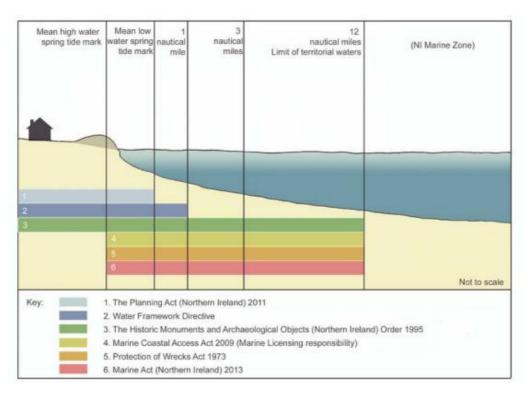


Figure 1 – Geographical Overlap between terrestrial and Marine Environment (Source: NIEA – Planning in the Coastal Area, 2017)

3.0 Planning Policy Statements and Supplementary Guidance

- 3.1 The suite of Planning Policy Statements (PPSs) for Northern Ireland does not include a document dedicated to coastal management. A Planning Strategy for NI (which has largely been superseded by the SPPS) contains five policies related to the coast:
 - Policy CO1 The Undeveloped Coast
 - Policy CO2 The Developed Coast
 - Policy CO3 Areas of Amenity or Conservation Value on the Coast
 - Policy CO4 Access to the Coastline
 - Policy PSU10 Development at Risk
- 3.2 Reference is also made to the coast or to aspects of the coastal environment in PPS 2 – Natural Heritage, PPS15 – Planning and Flood Risk and PPS16 – Tourism.

4.0 LOCAL POLICY CONTEXT

The Big Plan for Ards and North Down 2017-2032

- 4.1 The Big Plan is the Community Plan providing an overarching framework setting out a shared vision and ambition that Ards and North Down's Strategic Community Planning Partnership has agreed to work towards over the next 15 years. The vision of the plan is that Ards and North Down (AND) is a vibrant, connected, healthy, safe and prosperous place to be.
- 4.2 The overarching, cross-cutting ambition of The Big Plan is 'To have empowered, resilient individuals and communities, to reduce inequalities; to promote good relations and sustainability; and to improve accessibility of all public services.'
- 4.3 The Big Plan contains five outcomes that it hopes will reflect the position of the borough by 2032. The following are of relevance to this technical supplement:
 - Outcome 3: All people in Ards and North Down benefit from communities where they are respected, are safe and feel secure The Coastal Management policies of the dPS ensure that people and property are protected from the risks posed by flood inundation, coastal erosion and land instability.
 - Outcome 5: All people in Ards and North Down benefit from an environment that is valued, well managed and accessible
 The Coastal Management policies aim to restrict development in areas of the AND environment that are subject to erosion, land instability and flooding risks.
- 4.4 The Local Government Act 2014 through an amendment to Section 8 of the Planning Act (Northern Ireland) 2011, introduced a statutory requirement that the preparation of the LDP must take account of the Community Plan. The Big Plan will work in tandem with the LDP, which provides the spatial framework to achieve the shared vision for the Borough.

Ards and North Down Corporate Plan 2024-2028; A Sustainable Borough

4.5 The core of this new Corporate Plan is the vision of a sustainable Borough where environmental, social and economic wellbeing are interdependent. The Coastal Management policies of the LDP can contribute positively to achieving the key aims of the Plan by ensuring development is only approved in the

most sustainable locations, avoiding the economic implications of loss or damage to property. The Coastal Management policies protect sensitive coastal areas which act as natural buffers between built development and the sea. The retention of these areas is in line with Outcome Two of the Corporate Plan which refers to being an 'environmentally sustainable and resilient Council and Borough.' Similarly, the policies relating to the developed coast should assist in meeting the economic development priorities and outcomes by encouraging regeneration and public access to urban waterfronts within our settlements.

The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 (Ards and North Down Borough Council)

4.6 The Integrated Strategy presents a vision for the pursuit of prosperity in the Borough of Ards and North Down. The strategy recognises that the natural landscape of sea, loughs and land is one of the three core strengths of the Borough and represents a unique opportunity for visitors to experience tranquillity, creativity and great quality food in a place steeped in history. This in turn, provides opportunities for investment and economic growth in sectors that are aligned with blue/green credentials such as coastal tourism, marine renewable energy, seafood production, marine research, science and technology.

Shared Island Cross-Border Projects

4.7 In October 2022, the Council was awarded a portion of €4.3 million made available through the Shared Island Local Authority Development Funding Scheme. The aim of the scheme is to get councils working collaboratively with Irish local authorities on a number of cross-border projects. One such scheme is the 'Coastal Erosion Prevention Project.' In recognition that erosion is an issue which is expected to get more serious in the future along the east coast of Ireland, Ards and North Down will be working with Louth and Meath County Councils, as well as Newry Mourne and Down District Council to carry out a feasibility study. The project will explore sustainable, nature-based solutions to coastal erosion in the East Border Region. It will contribute to the building of an evidence base upon which to take coastal management forward in the future.

5.0 EXTANT AREA PLANS

5.1 It should be noted that BMAP was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan 2001, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area, with draft BMAP remaining a material consideration. These plans remain extant until replaced by the new Local Development Plan (LDP) for the Borough. The existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options.

Draft Belfast Metropolitan Area Plan 2015 (dBMAP)

- Volume 7 of draft BMAP 2015 sets out policies for the former North Down District. These policies have been developed in the context of the Plan Strategy and Framework contained in Volume 1 of the Plan and are in general conformity with the RDS.
- 5.3 The North Down coastline forms a linear shoreline strip extending from the edge of Belfast, at the head of Belfast Lough, through to Orlock Point. This area is designated as part of the draft BMAP Coastal Area and this provides additional protection for its unique landscape value and nature conservation interest, especially from intense recreational and tourism pressures.
- 5.4 The Plan highlights that Holywood, Helen's Bay and Bangor act as coastal urban centres and are linked by a good transport network comprising of the A2 dual carriageway and the Belfast-Bangor railway line, as well as other minor roads and the North Down coastal path. Altogether, there are five coastal settlements within the former North Down District Bangor, Holywood, Groomsport, Helen's Bay and Orlock.
- 5.5 Policy COU4 of draft BMAP designates part of Bangor's coastline as an urban waterfront, with the aims of enhancing and regenerating the waterfront area around the marina; retaining and further enhancing public access to the coast, protecting existing open space; and enhancing the tourism potential.
- 5.6 There are a number of other draft BMAP designations that are relevant to the coastal environment. For example, Local Landscape Policy Areas (LLPAs) are defined as 'areas adjoining settlements which are considered to be of high

amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development.' Eleven of the LLPAs in draft BMAP are located wholly or in part along the coastline. Their coastal characteristics such as headlands, raised beaches or ocean views are identified as part of the reason why they are worthy of designation. Some examples include Lukes Point, Seapark and Seahill Coastal Area and a full list can be found in Appendix B.

5.7 Similarly, there are other BMAP designations which are influenced by their coastal locations. Areas of Townscape and Village Character (ATCs and AVCs) are designated within settlements on the basis of their unique character and sense of place and a number of these are located on the coast such as Bangor West, Groomsport and Marino/Cultra and Craigavad. Rural Landscape Wedges at Helens Bay, Groomsport and Holywood are also partially coastal.

Ards and Down Area Plan 2015 (ADAP)

- 5.8 The ADAP was adopted in 2009 and relates to the legacy Ards Borough Council area. The Plan identifies nine coastal settlements Donaghadee, Ballyhalbert, Ballywalter, Portaferry, Portavogie, Whiterock, Millisle, Cloughey and Kircubbin. There are no specific policies or designations relating to the coast. Instead, the Plan refers to operational planning policies contained within PPS 2 (Planning and Nature Conservation) in recognition of the international and national nature conservation designations that apply to the Ards coastline.
- 5.9 As was the case with draft BMAP, there are several Local Landscape Policy Areas and Area of Townscape Character designations that have been influenced by their coastal settings and views such as Millisle Shoreline and Portavo House LLPAs and Kearney and Kircubbin ATCs.

Cross Boundary Policy Context

5.10 Throughout the LDP process it has been important to take the position of other councils, and particularly our neighbouring councils into account. Ards and North Down Borough is bounded by Belfast City, Lisburn and Castlereagh City and Newry, Mourne and Down Council areas, each of which are at different stages in the formulation of their own LDP.

Table 1: Neighbouring Councils Position in relation to the Historic Environment

Council	Document
Belfast City Council (BCC)	The BCC draft Plan Strategy was formally adopted on 2 May 2023.
	BCC LDP policies for the coast aim to protect and enhance the quality of the coastal environment, including its nature conservation, scenic and amenity value, whilst acknowledging the importance of the port of Belfast to the city and region.
	Policy LC4 – 'Coastal Area' states that new developments should not have an unacceptable affect either directly, indirectly or cumulatively upon the coastal area. Outside the settlement limit but within the coastal area, only proposals of regional or national significance will be permitted and in these cases, it must be demonstrated that the proposal will not harm the qualities of the coastal landscape.
	In all cases, the potential impacts of environmental change will be carefully considered and in some cases mitigation measures or a detailed sea level/flood risk assessment will be required.
Lisburn Castlereagh City Council (LCCC)	N/A
Newry, Mourne and Down District Council (NM&D)	The NM&D draft Plan Strategy was published on 27 th June 2025. Strategic Policy CDS1 Coastal Development supports proposals that protect the undeveloped coast from inappropriate development and support the sensitive enhancement of the developed coast.
	Policy CO1 relates to the undeveloped coast specifically and operates a presumption against all new development

other than in exceptional circumstances in the undeveloped coastal zone. A number of exceptional circumstances are listed including replacement dwellings, residential extensions, council-supported tourism proposals and proposals of overriding national or regional economic importance.

Policy CO2 refers to the developed coast and aims to protect coastal open space whilst also supporting schemes that enhance public enjoyment of the coast or secure environmental benefits.

Lastly, policy DAR1 deals with coastal erosion and land instability and applies a precautionary approach to development in locations that may be at risk from these issues. The policy requires the submission of appropriate assessments (to include remedial management measures) where the level of risk is uncertain.

- 5.11 The Council has engaged with each neighbouring Council's POP consultation as well as the dPS consultations of Belfast City Council and Lisburn and Castlereagh City Council. Senior LDP officers have also extensively engaged with Newry Mourne and Down District Council with respect to the strategic designation of an Undeveloped Coastal Zone.
- 5.12 Finally, professional officers from the LDP team have taken part in a number of cross council forums including the Metropolitan Spatial Working Group and the Development Plan Working Group. The Council has also been actively participating in the Dfl/DAERA jointly hosted Coastal Forum, to ensure that all aspects of coastal erosion relevant to our district are evidenced as best as possible.
- 5.13 Most recently, online engagement on the Council's draft Plan Strategy was held with the three neighbouring councils in March 2025. This included further discussion of approaches to the Undeveloped Coastal Zone designation and how this aligns with NM & D Councils similar designation.

6.0 PROFILE OF OUR COASTLINE

Ecology of the Coast

6.1 The Ards and North Down coastline area is unique and contains nationally and internationally significant coastal habitats for birds and wildlife (that are also

recognised for their ecological value) including mudflats, sandy beaches, coastal saltmarsh and rocky shore. These areas are protected via a framework of National, European and international environmental designations.

International and European Coastal Conservation Designations

- 6.2 **Ramsar Sites** are wetland sites designated to be of international importance under the Ramsar Convention. The objective of the designation is to stem the progressive encroachment and loss of wetlands through the encouragement of their wise use. There are three Ramsar sites in the Borough.
- 6.3 **Special Protection Areas (SPAs)** are sites selected for their importance as areas for breeding, overwintering and migrating birds, designated under the Birds Directive. There are four coastal SPAs in the Borough.
- 6.4 **Special Areas of Conservation (SACs)** are designated under the Habitats Directive. The designation provides strict protection for a list of species whose resting and breeding places must be protected to ensure their survival. Strangford Lough is an SAC. A further SAC has also been designated off the eastern coast of the Borough, in the North Channel, due to the incidence of Harbour Porpoise.

Table 2: Ramsar/SPA/SAC Sites in the Borough

Strangford Lough SPA/SAC/Ramsar Site

Situated on the east coast of Northern Ireland, Strangford Lough is a large, shallow sea lough with an indented shoreline, which connects to the Irish Sea via the Strangford Narrows. The varied patterns of tides, wave action, water quality and underlying geology create the conditions for a complex mosaic of marine and intertidal habitats. The west shore has numerous islands typical of flooded drumlin topography. The Lough also contains extensive areas of mudflat and also sandflats. The physical regime of the Lough, with its high water quality, complex current systems, varying topography, substrata and water depths, is hugely important to the overall ecosystem.

This is Northern Ireland's most important coastal site for wintering waterfowl and also for breeding terns. This also includes the intentionally important species of light bellied brent geese, knot and redshank. Nationally important species contribute to the overall population of over-wintering waterfowl including species such as bar-

tailed godwit, coot, curlew, eider, greylag goose, greenshank, goldeneye, golden plover, lapwing, mallard, mute swan, oystercatcher, shelduck, teal, turnstone and wigeon.

The area also hosts an internationally renowned variety of marine and intertidal habitats. These include coastal lagoons, shallow inlets and bays (for which this is considered to be one of the best areas in the United Kingdom), Atlantic salt meadows, mudflats and sandflats, coastal shingle vegetation and reefs. There is no comparable area in Northern Ireland with such a range of either habitats or species. This includes an assemblage of vulnerable and endangered wetland plants and animal species such as Marine sponges, hydroids, molluscs and sea urchins which are restricted to Strangford Lough in Northern Ireland and in some cases are unknown or very rare elsewhere in the British Isles. The mudflats support luxuriant beds of eelgrass and such extensive 'beds' are rare in British Isles.

Other mammal fauna includes common seal, grey seal and otter. Strangford Lough is the most important site in Ireland for the common seal.

Outer Ards Ramsar/SPA Site

The Outer Ards Ramsar/SPA extends from Grey Point in Helens Bay to Ballyquintin Point, near Portaferry. The site mainly encompasses intertidal areas and includes sand and mud dominated shores, cobble and boulder beaches and rocky shores. Offshore Islands are also present. Adjoining habitat includes areas of marine grassland and heath. Some areas still display the natural transition from maritime to terrestrial vegetation, where a number of notable communities occur. At least 17 rare or local plant species have been recorded across the range of habitats in the area.

The site contains important breeding and overwintering populations of waterfowl. The principal interests are breeding colonies of arctic tern and manx shearwater, together with the wintering population of light-bellied brent goose, golden plover, turnstone and ringed plover.

Belfast Lough Ramsar/SPA Site

Belfast Lough is a large intertidal sea lough situated at the mouth of the River Lagan on the east coast of Northern Ireland. The inner part of the Lough comprises a series of mudflats and lagoons. The outer lough is restricted to manly rocky shores with small sandy bays.

The Ards and North Down section of the Belfast Lough Ramsar/SPA site extends from the western district boundary (adjoining Belfast City Council) to Helen's Bay. The site regularly supports internationally important numbers of redshank in winter. The site also regularly supports other bird species including oystercatcher, shelduck and purple sandpiper.

North Channel SAC Site

The North Channel SAC is located along the eastern coast of Northern Ireland and has been identified as an important winter area for harbour porpoise. It is estimated that it supports around 1.2% of the UK Celtic and Irish Seas population. This site, which has an area of 1604km2, supports areas where large groups of up to 100 harbour porpoise have been sighted.

Habitats within the site consist mainly of coarse or sandy sediments, with patches of rock and mud. Water depths reach a maximum of 150m along the eastern boundary, but much of the site lies between 10 and 40m.

Copeland Islands SPA Site

The site encompasses the three islands down to the low water mark, together with associated islets and excluding buildings and associated structures. The site is located off the NE County Down coast and close to the entrance of Belfast Lough. It includes rocky shores together with limited areas of sand/mud and cobble/boulder beaches.

Terrestrial habitats include saltmarsh, freshwater marsh, maritime grassland, limited extent of inland cliff and semi-improved agricultural grassland. The principal interests are the breeding colonies of Manx shearwater and Arctic tern.

Big Copeland also supports Northern Irelands' first confirmed breeding pair of mediterranean gull, with some 250 pairs present, which represents 7% of the Irish breeding population.

6.5 See Appendix C for a map of the international and European nature conservation designations that apply to the coast of our Borough.

National and Regional Coastal Designations

6.6 **Areas of Special Scientific Interest (ASSIs)** are areas of land that have been identified by scientific survey as being of the highest degree of

- conservation value by reason of their flora, fauna, geological or geophysical features. They have a well-defined boundary and are largely in private ownership. The underlying philosophy is to achieve conservation objectives through co-operation with landowners.
- 6.7 There are six coastal ASSIs in the Borough Strangford Lough, Outer Ards coastline, Belfast Lough, Ballymacormick Point, the Copeland Islands and Ballyquintin Point. More details of the special characteristics of these sites and a map showing their locations can be found in Appendix D and E.
- 6.8 **Marine Conservation Zones (MCZs)** The Marine Act (Northern Ireland) 2013 includes provisions for establishing Marine Conservation Zones. MCZs may be designated for various purposes including the conservation of marine species and habitats, whilst taking the economic, cultural and social consequences of doing so into account. The Act also allows DAERA to protect MCZs from damage by unregulated activities including anchoring, kite surfing and jet skiing and it is an offence to intentionally or recklessly destroy or damage a protected feature of an MCZ.
- 6.9 Strangford Lough was designated as Northern Ireland's first MCZ, following the introduction of the Marine Act in 2013. The extent of the MCZ includes the SAC and SPA but also extends outside Strangford Lough to Kearney village on the northern side and Sheepland Coast on the southern side (which is outside our Borough). Outer Belfast Lough was one of four further MCZs, formally designated in 2016. It is described as 'an exposed area located within Northern Irelands' busiest sea lough.' The Lough encompasses a wide range of habitats such as sub-tidal sand and mixed sediments, sediment dominated bays and rocky shores. The MCZ has been designated due to the presence of a well-established and dense population of ocean quahog, a mollusc that can reach 400 years old. The species lives buried in the sub-littoral sand habitat and is an important source of food for several fish species.

Coastal Infrastructure and Economy

- 6.10 As referred to previously, the majority of Ards and North Down's settlements have a coastal location. Within these urban areas, the shoreline exhibits a range of characteristics and uses, which make a key contribution to the economy and infrastructure of the Borough:
- 6.11 Portavogie harbour is an important commercial fishing port, housing a large fishing fleet catching mainly prawns and herring. Several food processing plants are located nearby at Princess Anne Road and produce is then transferred on to locations within and beyond the Borough.

- 6.12 Portaferry is located at the narrowest point of Strangford Lough and the Portaferry to Strangford ferry service operates every 30 minutes to convey about 500,000 passengers per annum between the two destinations. The alternative road journey measures 47 miles, whilst the ferry makes the 0.69 mile crossing in 8 minutes.
- 6.13 Bangor Marina is Northern Irelands' largest marina, offering 560 sheltered and secure pontoon berths. It also offers facilities such as toilets, showers, fuelling, water and electricity. In addition to the berthing facilities, Bangor seafront also includes other complementary uses such as HM Coastguard Marine Rescue subcentre, an RNLI boathouse and slipway and marine boatyard which offers boat repairs, storage, polishing and servicing.
- 6.14 In addition to the settlements listed above, the developed coastline within other settlements also provides key functions in relation to the operation of the Borough. These include the RNLI lifeboat and lighthouse in Donaghadee, an RNLI station in Portaferry, numerous sailing and yacht clubs and recreational facilities, such as Pickie Park in Bangor. In recent years, the coast has also acted as a backdrop to a number of successful maritime themed events in the Borough, such as Sea Bangor, The Portavogie Tide and Turf Seafood festival and Donaghadee Lifeboat Festival.
- 6.15 The recreational value of the coast is enhanced by the North Down Coastal Path and other amenity areas such as Donaghadee Harbour and numerous beaches.

Challenges of the Coastline

6.16 The evidence base clearly illustrates the social, economic and environmental significance of the coastline to the Borough. Coastal change in the form of erosion, increased incidence of storms and sea level rise would therefore have serious implications for the area, particularly considering the majority of our settlements occupy coastal locations. Incidences of flooding and storm damage, including complete collapse of sections of Peninsula coast roads have become more frequent in recent years and saltwater encroachment is damaging to fragile wildlife and their habitats. It is clear that the dynamic nature of the coastline is not fully understood and that a precautionary approach is required to manage the threats and reduce pressure upon the coastal zone.

7.0 PREFERRED OPTIONS PAPER

- 7.1 The Council's Preferred Options Paper (POP), published in 2019 was the first formal stage in the preparation of the LDP for the Borough. It was designed to promote debate in relation to key strategic planning issues arising in the area. The POP identified 42 key planning issues and examined options for addressing these issues. In each case, a preferred option was highlighted and the rationale for selection of this option was given.
- 7.2 The POP also includes a review of the existing operational planning policies, largely contained within the suite of Planning Policy Statements. This review stimulated public debate on whether the existing policies are still suitable or whether a different approach would be more appropriate to meet local circumstances.
- 7.3 Following a minor revision to the online version of the POP, the 12 week consultation period was relaunched and therefore the total consultation period from the official launch was 19 weeks.

POP Representations

7.4 Key Issue 16 – The Undeveloped Coast

This issue presented a preferred option to 'designate an Ards and North Down coastal area' within which development would be restricted through the use of bespoke policy. Of the respondees to the consultation, 69.23% agreed that this was an appropriate way of dealing with development proposals in coastal areas outside of settlement limits.

7.5 Key Issue 17 – The Developed Coast

In relation to this issue, the preferred option was to designate urban waterfronts throughout key coastal settlements in the Borough in order to promote their regeneration and enhancement for tourism and recreation purposes. This option stems from the draft BMAP designation of Bangor as an urban waterfront, with associated policy to support appropriate proposals that would positively contribute to its regeneration. 80.77% of the consultation respondents agreed with the concept of urban waterfronts. There was some uncertainty about what the term would actually mean in practice, but other respondents were supportive of the proposed designation if it would enhance infrastructure and public access to the water for activities such as kayaking and sailing.

7.6 When asked to suggest possible urban waterfront locations, 11 settlements were put forward, with Groomsport, Portaferry, Donaghadee and Millisle receiving multiple mentions.

7.7 Key Issue 18 – Coastal Management

Key issue 18 considered the matter of coastal change. The preferred option submitted in the POP was to 'identify areas of existing and potential coastal erosion and land instability (subject to data being available) where there will be a presumption against development except in exceptional circumstances.' The public consultation revealed that the majority of respondents agreed that this was the preferable option.

7.8 For further details on the POP consultation, please see the Preferred Options Consultation Report, dated April 2025.

Consultee and Councillor Engagement

7.9 In order to meet the requirements of the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the Department and other relevant government strategies and plans. Council has engaged with key consultees which represent relevant central government departments and agencies.

Consultee responses

- 7.10 Dfl welcomed the extension of the designated coastal area as originally defined in draft BMAP, to include the entire coastline of Ards and North Down as this would provide adequate protection for the coastal landscape, important views and vistas, built and natural heritage assets and marine ecosystems. Scope will be provided for regionally significant proposals that have to be located in the coastal zone and Council should ensure that such proposals are only permitted where 'there is no feasible alternative site within an existing urban area in the locality.'
- 7.11 Consultees were largely supportive of the designation of urban waterfronts throughout the Borough. Dfl would welcome clarification as to the policy approach to the wide range of potential uses along the developed coastline such as fishing, tourism and infrastructure. DAERA Natural Environment Division (NED) agreed with the preferred option in principle, subject to boundary selection but noted that improved or enhanced access to the coast should not be at the expense of landscape or natural heritage interest.
- 7.12 In terms of coastal management, Dfl noted a difference in the wording of the preferred option and the SPPS the SPPS states that development 'will not be permitted in areas of the coast that are known to be at risk from flooding,

- coastal erosion or land instability,' whereas the POP refers only to developments that would 'exacerbate a known erosion or land instability risk.' Concerns were therefore expressed that the approach does not fully reflect the SPPS direction. Dfl also considers that coastal flooding should be addressed in relation to the developed coast policy.
- 7.13 Dfl acknowledges the difficulties in formulating a policy response to coastal change due to the high-level nature of the data available. However, there is some useful information on the extent of coastal erosion and coastal flooding, as well as the location of natural and heritage assets, including priority habitats, coastal settlement limits, harbours and ports with public access points along the coast.
- 7.14 DAERA Marine Environment Division has expressed concern over the limited reference to the UK Marine Policy Statement in the POP document and highlights the legal requirement to demonstrate how the council has had 'regard' to the UK MPS in the draft policies and proposals of the draft plan strategy. This comment is not limited to topics such as coastal management and natural environment as any proposed land allocation, location of development, policy or proposal option being considered for inclusion within the LDP, has the potential to affect the NI Marine area.
- 7.15 The DAERA Marine Conservation Team considers it appropriate that the draft Plan Strategy should include a requirement to explore alternatives to hard engineering and encourage innovative and sustainable development design which will co-exist and accommodate a changing coastline and allow natural processes to take place.

Council Engagement

- 7.16 Representatives from relevant Council departments have also been engaged with to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives. Officers from the LDP team have taken part in a series of Community Plan Thematic Group meetings and engagement events. Furthermore, members of the Community Plan team have also attended LDP workshops and sustainability appraisal meetings.
- 7.17 The LDP team has engaged with the Ards Peninsula Coastal Erosion Forum, consisting of Councillors and residents with a particular interest in this issue. LDP team staff attended the Coastal Planning Working Group along with the Assets and Property Services Department and Environmental Services. Council staff have also taken part in stakeholder engagement on a pilot project being carried out by the Agri-Food and Biosciences Institute. The 'Coastal Change Risk Assessment Project' is based in Outer Ards, with the

intention of creating a value-added tool to assist decision making along the coastline. This recognises the current lack of authoritative data on coastal change and will use sentinel satellite imagery plus lidar data to produce a coastal vulnerability map.

- 7.18 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department for Infrastructure (Dfl). Accordingly, Elected Members have also been engaged in the development of draft Plan Strategy, to ensure that the document is generally aligned with Council's strategic priorities. This engagement was facilitated through two council workshops. The first of these took place on 21 March 2018 and provided an introduction to the topic for members. The second workshop, (held virtually due to Covid 19 restrictions) was on 18 August 2020 and focussed on policy development for the coastline. Background papers were circulated to all members prior to these events.
- 7.19 Members were in favour of restrictive policies for the undeveloped coast to protect against overdevelopment and that the relevant area should be clearly designated on a map. The onus should be upon the developer to provide evidence of potential impacts and mitigation measures. In terms of the developed coast, it was agreed that policy should present an opportunity for regeneration and the enhancement of tourism on the coast. The need for the policies to align with wider council strategies for the regeneration of the Bangor seafront were highlighted and the Planning team are actively engaged with the Regeneration Team on this matter. Members usefully highlighted that policies that encourage tourism and recreation on the coastline should not preclude developments that are essential to the emergency services that operate on the coast, such as RNLI and the Coastguard. In relation to a proposed coastal management policy, Members were largely of the opinion that such a policy was needed but that it would probably need to evolve as new data emerges.
- 7.20 An initial draft of the Plan Strategy, which included policies for coastal management, was presented in confidence to full Council in September 2022. It was agreed in principle by Members.
- 7.21 On 3 October 2023, a further development of coastal policy was put forward for agreement by Members. This related to the designation of the Ards and North Down Undeveloped Coastal Zone around the entire coastline of the Borough and accompanying policy. The methodology to inform the extent of this designation is discussed in detail later in this paper. The approach to designation and policy direction were informed by meaningful engagement with Newry Mourne and Down District Council.

7.22 Further discussion regarding the fine details of policy wording and the exceptions to be included took place in 2024. It was the opinion of the Members that replacement dwellings should be permitted as an exception to this policy which is otherwise very restrictive in terms of approval of housing. Final approval for the amended policy and all of the other policies in the draft Plan Strategy was secured at a Special Planning Committee meeting held on 20 January 2025 and ratified at the full Council meeting on 29 January 2025.

Development Management Team

7.23 The members of the Development Management planning team were supportive of the introduction of planning policies for the coast. However, they did express concern regarding the lack of technical expertise within the Council to assess risks posed by erosion and land instability and that the onus should not be put upon planning staff to disprove 'evidence' put forward by applicants. This would create issues with policy implementation.

Sustainability Appraisal (SA)

- 7.24 The formal Sustainability Appraisal process was undertaken by the LDP team and Shared Environmental Services in March and April 2024. The councils' preferred policies and proposals were appraised against reasonable alternatives. The process proved useful in further refining policies in relation to sustainability objectives.
- 7.25 The SA process influenced the coastal management policies in the following ways:
 - The area to which the Undeveloped Coast policies would apply was clarified i.e. sites that fall both wholly and partly within the undeveloped coastal zone to avoid any ambiguity and difficulties of implementation;
 - The appraisal of the coastal change policy prompted consideration of the term 'intensification' as used in the wording, particularly how it is defined.
 The term was eventually omitted, again to assist with interpretation of the policy.
- 7.26 As part of the SA process, reconsideration of amended coastal policy was carried out post-engagement with Elected Members. Since SA is a high level process that does not go into the fine detail of the policy wording and also because the strategic objectives of the policy remained the same, a new SA

was not required for these policies. Instead, slight amendments to the SA report were made to ensure that the amended policy wording was accurately reflected.

8.0 DRAFT PLAN STRATEGY APPROACH

- 8.1 The fundamental approach of the draft Plan Strategy is to support the aims and objectives of the RDS and the SPPS by providing a strategic policy framework that protects the undeveloped coast from inappropriate development, whilst accommodating appropriate sustainable development on the developed coast.
- 8.2 The draft plan strategy has been informed by the POP responses and all of the other methods of engagement that are described above. The following is a summary of the policy amendments and additions that are being put forward in consideration of all of the evidence gathered to date.

The Undeveloped Coast

- 8.3 The classification of the area of the coastline which is outside of existing settlements and existing major developments (such as ports) comes directly from the SPPS, which states at para. 6.43 that 'the aim of the SPPS in relation to the coast is to protect the undeveloped coast from inappropriate development.'
- 8.4 The Landscape Character Review for Ards and North Down illustrates that seven out of the ten Landscape Character Areas in the Borough are coastal or partly coastal in nature. It highlights that coastal areas such as the Outer Ards Coastal Fringe and Scrabo Coastal Plain have a very high sensitivity to development, with limited capacity for anything but low-key developments that are carefully designed and sited to integrate into the landscape. Tourism, one off housing and tall structures (notably wind turbines) were identified as the most significant potential development pressures.

Designation of the Ards and North Down Undeveloped Coastal Zone (ANDUCZ)

8.5 The purpose of the designation of an AND Undeveloped Coastal Zone (UCZ) is to spatially define an area where a balance is to be achieved between protecting the coastline from potentially damaging development, whilst also allowing certain developments that are very minor in nature or deliver benefits to the coastal environments and Borough residents. This is in line with the SPPS regional policy direction. Whilst primarily a tool to protect the visual

amenity of our sensitive coastal landscapes, the UCZ is also a useful first step towards preparedness for affording protection to the most vulnerable coastal areas until such time as the extent of coastal change in the Borough is fully understood.

Methodology for Designation

- 8.6 The LDP team used a combination of desktop studies, aerial images and GIS to map the extent of the undeveloped coastal zone. The GIS officer was able to map relevant designations, contours and developments for the entire coastline of the Borough. This base map was used as a starting point for consideration of the coastal zone.
- 8.7 The extent of the AND Undeveloped Coastal Zone was informed by the following methodology:
 - 1. The outer edge of the undeveloped coastal zone coincides with the Low Water Mark. This means that it extends beyond the 'developable' coast of the Borough and includes some intertidal areas such as mudflats, beaches and other coastal features.
 - 2. The inner edge/landward side has been defined using the following methodology (desktop assessment):
 - 5m contour considered as a starting point for the spatial extent of the landward side of the zone. The 5m contour considered to be minimum point below which any development would be incorporated into the coastal zone.
 - All lands within development limits of settlements excluded from undeveloped coastal zone, regardless of their elevation from sea level (these lands would form part of the 'developed coast.').
 - The intertidal area consisting of a range of coastal features including sand, shingle, saltmarsh, mud, boulders, dune and rocky outcrops was incorporated within the identified area as this corresponds with the Low Water Mark, referred to under Point 1.
 - The spatial extent of international and national nature conservation designations, such as SPAs, SACs, Ramsar, ASSIs were incorporated into the zone except parts that represented significant landward extensions.
 - The spatial extent of coastal SLNCIs and LLPAs designated through extant Area Plans was considered.
 - Headlands and other coastal projections such as Orlock Point,
 Ballymacormick Point and Ballyquintin were considered to be significant coastal features of high amenity value and were included in the designation.

- Unmaintained land adjacent to the shoreline and within the 5m contour, would generally be included within the UCZ, with the inner edge boundary following existing physical features where possible such as field boundaries, road lines and well-established vegetation.
- Sporadic development such as single dwellings within the 5m contour will be included within the coastal zone.
- Larger clusters of buildings such as caravan parks were largely excluded, except in instances where the caravan park extends to the coastal edge – in these cases, the parts of the site that were below the 5m contour were included in the undeveloped zone.
- 3. In areas where the delineation of the coast was unclear, these were identified for subsequent physical surveying by members of the LDP team.

Discussion of Approach to Designation

Use of 5m Contour

8.8 The 5m contour line was used as the starting point for the delineation of the undeveloped coastal zone. This is considered the appropriate elevation to ensure that all the appropriate coastal features such as sand, shingle and cliffs were captured and also the extent of relevant nature conservation designations and intertidal habitats. It is also recognised by a number of national and international environmental organisations, such as the European Environment Agency as the most suitable contour line for the identification of lowlands which are vulnerable to significant sea level rise and flooding risk. It is used as the starting point for the creation of Shoreline Management Plans in England and Scotland (examples include East Suffolk, East Solent, North Tyneside and Drumfries and Galloway Councils). The 5m contour has also been used by NGOs such as the RSPB in its Sustainable Shores document. The 10m contour was also considered, however it encroaches significantly inland. Owing to the narrow shape of the Peninsula, with a coastal border on three sides, it was determined that use of the 10m contour to define the undevelopable area could be unduly restrictive, in terms of appropriate rural and coastal developments coming forward.

Settlements adjacent to coastal area

8.9 A number of Ards and North Down settlements have a coastal location with only a narrow strip of coastal features such as rocky foreshore or sand between them and the sea itself. All lands within the settlement limit fall within the 'developed coast' - specifically defined as 'existing settlements, and existing major developments such as ports, isolated industrial units and power stations' in the SPPS. This means that all coastal areas that fall within the development limits of a town or village will not form part of the undeveloped

coastal zone even if they lie within the 5m contour line. However, development proposals in these locations will be subject to separate assessment against policy CO3 – Coastal Change. Adjacent to settlements, the undeveloped coastal zone will comprise of the area between the edge of the development limit and the low water mark – taking in the extent of the coastal features and nature conservation designations.



Figure 2 - Cloughey

The proposed undeveloped coastal zone does not encroach upon the settlement development limit of Cloughey and instead skirts around the coastal edge to the south-east of the development limit.

Settlements with Coastal Infrastructure

8.10 Some settlements with coastal infrastructure do not have an undeveloped strip between the edge of built development and the sea/lough. In such cases the undeveloped coastal zone will break on either side of these features. Examples include Bangor Marina and Donaghadee Harbour.



Figure 3 - Bangor Marina
The pale pink UCZ proposed boundary terminates at the marina and then restarts again on the other side of it.

Residential Development in the Undeveloped Coastal Zone

8.11 In terms of residential development in the undeveloped coastal zone – the new policy CO 1 allows for replacement dwellings only. This reflects para.
6.37 of the SPPS which states that 'the undeveloped coast will rarely be an appropriate location for new development.' This means that new residential development such as infill dwellings, dwellings in existing clusters and farm dwellings that would normally be acceptable in rural locations (subject to policy criteria), will not be acceptable where they also fall within the undeveloped coastal zone. However, existing development opportunities such

as replacements (including off-site replacements) will be considered as well as a range of non-residential developments and exceptions listed in policy CO1. It was considered material by Elected Members that replacement dwellings were permitted as an exception to the UCZ restrictions, rather than a policy approach that excluded all types of new residential development.

Clusters of Development

8.12 As described in the methodology for the delineation of the undeveloped coastal zone, sporadic development along the coast that is below the 5m contour was incorporated into the undeveloped coastal zone. Clusters of development were deliberately excluded where possible and these were relatively rare given the open nature and agricultural character of the countryside. However, there are some clusters of dwellings that do need to be evaluated. An example is Ballywhiskin – a townland between Millisle and Ballywalter. It consists of a linear belt of residential development straddling Whitechurch Road. Due to the lack of facilities, the group was not formally recognised as a settlement in the extant Ards and Down Area Plan 2015 and therefore, lies within the countryside. Given the low-lying nature of the cluster, with its seaward side extending right down to the water's edge, it would seem sensible to include these buildings in the undeveloped coastal zone and for the zone to extend to the logical physical boundary, which would be the coast road itself.



Figure 4 - Ballywhiskin Seaward edge of Ballywhiskin is low-lying and within the 5m contour so it is included in the Undeveloped Coastal Zone.

8.13 There are also a number of caravan parks along the eastern coast of the Peninsula that extend right down to the coastal edge and are wholly or partly within the 5m contour line and these were therefore incorporated into the undeveloped coastal zone also.

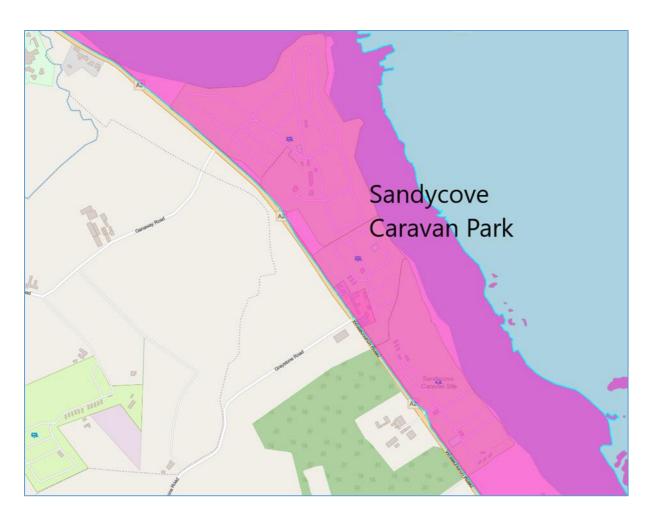


Figure 5 – Sandycove Caravan Park Sandycove Caravan Park extends right to the edge of the coastline and is almost entirely within the 5m contour line, hence it is incorporated into the proposed UCZ

Key Coastal Features

8.14 There are a number of rocky outcrops and headlands along the Borough coastline which contribute significantly to the coastal landscape of the They are of high amenity value in terms of their nature Borough. conservation interest but also for their scenic and recreational value. The coastal features that fall along the Belfast Lough shoreline are readily accessible to the public via the North Down Coastal Path and many are recognised as viewpoints. These include Grey Point, Ballymacormick Point, Stricklands Glen and Orlock Point. There are other features along the Peninsula shorelines such as Burr Point, Kearney, Ballyquintin Point and Island Hill. In these cases, it was appropriate to extend the landward boundary beyond the 5m contour to include surrounding lands, roads and laneways offering open views and vistas towards and sea or Lough. Legacy Plans Local Landscape Policy Area Designations were considered when setting the boundaries.

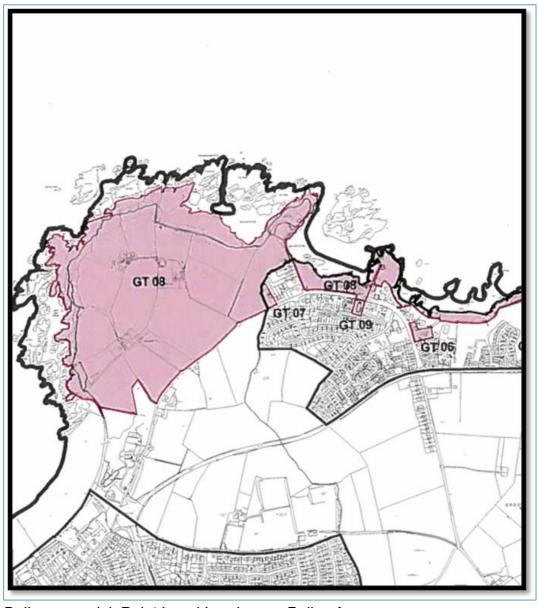


Figure 6 –

Ballymacormick Point Local Landscape Policy Area
Draft BMAP designation GT08 – Ballymacormick Point (Source Dfl)



Figure 7 – Ballymacormick Point
The UCZ at Ballymacormick Point incorporates the extent of the legacy BMAP LLPA
designation

Policy to Accompany Designation

- 8.15 In order to limit large scale development in the coastal zone, only proposals of regional or national significance that have a site-specific need will be permitted, and the applicant will have to demonstrate that it will not have a direct or indirect adverse impact upon the coastal environment and its setting. The stringent wording of the criteria should ensure that the undeveloped coast remains free from inappropriate development which would harm its unique character and fragile ecosystems.
- 8.16 In recognition of the fact that the coast performs a number of other valuable functions for the citizens of the Borough including as a public amenity, recreation asset and location of existing housing, there are some exceptions to the policy. These include schemes that enhance public access and enjoyment of the coast and deliver environmental benefit in such cases national or regional importance will not have to be demonstrated but there will be a requirement to demonstrate a site-specific need and lack of negative impact upon the coast. A further exception is for householder developments within the curtilage of existing dwellings. The issue of the coastal policy being

unduly restrictive in the case of existing property owners wishing to extend their properties was discussed at the BMAP Public Inquiry, so it is important that any policy going forward is cognisant of the number of existing dwellings on the coastline. A final exception is for the construction of a replacement dwelling, in compliance with policy HOU 10. If the dwelling accords with the provisions of this rural housing policy, then no intensification of development on the coastline should occur and the visual impact of the development should not be significantly greater than the dwelling it replaces.

Urban Waterfronts in the Developed Coast

- 8.17 The SPPS provides a definition of the developed coast 'existing settlements and existing major developments such as ports, isolated industrial units and power stations.' The aim of the SPPS in relation to this area is 'to support the sensitive enhancement and regeneration of the developed coast.'
- 8.18 The policy that has been developed for this area builds upon the urban waterfront designation that was given to Bangor in draft BMAP, with a focus upon regeneration, access and recreation. This aligns with wider council objectives to regenerate Bangor coastline, with funding secured via the Belfast Region City Deal. The actual locations to be designated as urban waterfronts will be determined at LPP stage, taking into account the suggestions submitted in the POP consultation.
- 8.19 Whilst the policy concentrates on leisure and recreation, it also acknowledges that the waterfront area has practical purposes, such as the location of Coastguard and lifeboat stations and that these critical functions should not be prejudiced by any recreational schemes coming forward. The policy criteria encourage proposals that will promote waterfront areas as drivers for economic development and that prioritise public access to the coast. It will also be important that any development proposals in these areas enhance their coastal identity through the retention and integration of promenades, maritime infrastructure and safeguarding key views of these.

Coastal Change

8.20 The dPS policy approach to coastal management is precautionary in line with the SPPS. It operates a presumption against development in known areas of land instability and erosion. It states that, in areas of known land instability and coastal erosion, new development, or the intensification of existing development or land uses, will not be permitted. The policy further advocates a precautionary approach where statutory consultees advise that erosion and land instability is likely but that the extent of the impact is not fully known. In

these circumstances, planning permission should also be refused. This approach aligns with the SPPS direction and also the stance that has been adopted by Marine Environment Division in respect of consultations received for proposals adjacent to the coastline.

- 8.21 In response to Members concerns and also in view of the large amount of existing residential properties within the coastal area of our Borough, the policy allows an exception in the case of householder development (the alteration, extension or improvement of a dwelling house or minor development within its curtilage such as garages, walls and other outbuildings) where the proposed development does not extend closer to the coastline than the existing dwelling house.
- 8.22 Whilst there are clearly issues with implementation due to the lack of detailed and reliable baseline data on erosion and land instability, it was the opinion of all interested parties that it would be remiss to exclude a policy that addresses these issues from the LDP. This is not least due to the overwhelming presence of the coast in our Borough but also as a result of the growing public support for measures to deal with coastal erosion and instability.
- 8.23 The Dfl and DAERA Coastal Forum, set up in 2019, agreed that the Forum would be the mechanism through which coastal management issues would be progressed collaboratively by Central and Local Government and the National Trust. Any new or emerging strategies will be incorporated into the LDP. The Forum will also progress the development of best practice guidance to assist local councils in helping to inform local development plans.
- 8.24 It is acknowledged that Central Government, councils, academic institutions and other groups are working together to try and address the knowledge gaps. This could lead to policy refinement over time and through the monitoring process. Studies such as that being carried out the by Agri-Food and Biosciences Institute (AFBI) are encouraging and any resulting vulnerability maps would be invaluable for development management teams assessing coastal planning applications.

9.0 SOUNDNESS

9.1 The LDP has been prepared to meet the tests of soundness as set out in the Dfl Development Plan Practice Note 6: Soundness (Version 2, May 2017).

The draft Plan Strategy insofar as it relates to coastal management subject policies and other relevant policies in the document is regarded as sound, as it is considered to have met the various tests of soundness as summarised below:

Table 3: Consideration of Soundness

Proce	edural Tests
P2	The Coastal Management policies have evolved from the POP, POP consultation Report and Consultee, Development Management and Councillor Engagement as described in earlier sections of this document.
P3	The Coastal Management policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consi	istency Tests
C1	The Coastal Management policies have taken account of the RDS in particular RG9 and RG11
C2	The Coastal Management policies have taken account of our Community Plan, particularly outcomes 3 and 5. Refer to paragraphs 4.1-4.4 of this document.
C3	The Coastal Management policies have has taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.31 - 6.51. Regard has also been had to the UK Marine Planning Policy Statement and the draft Marine Plan for NI.
C4	The Coastal Management policies have taken account of the existing development plans within Ards and North Down, Conservation Area Design Guides, ongoing Council initiatives and the neighbouring council context.
Cohe	rence and Effectiveness Tests
CE1	The Coastal Management policies have taken account of the emerging LDP's of our three neighbouring Councils, and it is not considered to be in conflict with them.
CE2	The Coastal Management policies are founded on a robust evidence base, which includes the baseline information assembled in the Coastal

	Management Position Paper, the POP and responses to it, and subsequent consultation with consultees
CE3	The LDP team will monitor the permissions for coastal development falling within the UCZ to see how many approvals in a given year are approved which are contrary to policy CO1.
	Due to the lack of reliable data on coastal change, there are no clear indicators to monitor the implementation of policy CO3 at this stage. However, it is intended to monitor any trends.
CE4	Coastal Management policies will be reviewed at Plan Review stage. There will be flexibility at Local Policies stage to introduce new and review existing local designations provided they are underpinned by a sound evidence base.

Appendix A- Map of Coastal Settlements



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Appendix B – Coastal LLPAs

The following table lists the coastal LLPAs designated by the draft and extant legacy area plans that apply to the Borough. The features, or combination of features that contribute to the environmental quality, integrity or character of the listed areas are noted. These include archaeological sites, listed and/or locally significant buildings and areas of local amenity importance.

Former Ards District

Reference	Settlement	Name and Characteristics of interest
LLPA1	Donaghadee	 Portavo House and Demesne Substantial areas of mature trees in the form of shelter belts and woodland set within a late 18th Century planned landscape park and associated walled and ornamental gardens; Locally important large house built on site of earlier houses; and Water tower on localised hill (Shore Hill).
LLPA4	Donaghadee	 Croagh Patrick Nursing Home, St. Patricks Graveyard and standing stone Site of Templepatrick church graveyard and St. Patricks Holy Well; Standing stone on small headland; Important tree groups surrounding nursing home; and Undeveloped stretch of coastline with small bay and foreshore.
LLPA8	Donaghadee	 'The Commons' and coastline Attractive stretch of coastline affording views out to sea; and Valuable area of local amenity importance with extensive public walkways and including both passive and active recreational areas.
LLPA1	Ballyhalbert	 Motte, standing stone and church site Series of 3 sites of archaeological interest – 2 scheduled sites, the motte, a standing stone and one unscheduled site of a medieval church and a modern church in ruins with associated graveyard; and

		 Localised hill and distinctive landform, comprising a steep bank and flat raised beach.
LLPA1	Ballywalter	 Ballywalter Park and coastline Important tree groups within historic demesne boundary provide an attractive setting to the village; Listed house, lodge and entrance gates (Ballywalter Park); Landscape feature and tree ring of archaeological interest; Mature tree belts and stone walls enclose the coast road on both sides; and Significant new tree planting undertaken in the area between the coast road and the beach.
LLPA2	Ballywalter	 Holy Trinity Church and setting Listed church and surrounding grounds adjoining rectory and lands to the south; and Important mature trees around church and along boundaries of the site down to Dunover Road.
LLPA4	Ballywalter	 Harbour Area and coastline Shoreline and harbour with public walkways and picnic areas, affording panoramic views seaward.
LLPA2	Cloughey	 Landform between Cloughey and Portavogie Localised hill and important physical feature with steep embankment, ridge top fields, raised beach area and foreshore; Landform buffer separating Portavogie and Cloughey and provides distinctive landscape setting on the approach to both villages; and Attractive coastal landscape features with small scale development along the raised beach and small local amenity picnic area along the coast to the north.
LLPA3	Cloughey	 Presbyterian Church, shoreline and headland Locally important church, which is a prominent landmark building on the shoreline, and surrounding graveyard to the north and south;

		 Undeveloped strip of land between Manse Road and sea, partly defined by the sea wall; Localised hill, prominent headland and raised beach/embankment frames settlement to the north; and Hilltop archaeological monument with large schedules areas including ruins of church, graveyard and cross slab and souterrain.
LLPA4	Cloughey	 Caravan Park and adjoining lands Valuable area of local amenity importance comprising exposed headland at northern end of village forms an attractive vista from the main road; Area of local nature conservation interest adjoining the Outer Ards ASSI; Undeveloped headland area; and Attractive shoreline of local amenity importance, including an expanse of sand dunes from where there are expansive views out to sea.
LLPA1	Kircubbin	 Monaghan Bank Distinctive landform and headland provides the landscape setting to south of the village and encloses the bay; and Local amenity area with public access along the shore, characterised by undeveloped slopes and a raised beach and bank.
LLPA2	Kircubbin	 Nunsquarter and associated lands Listed Nunsquarter House, control house and weighbridge and their surroundings, including mature trees and vegetation which continue over the crest along Shore Road; and Headland and distinctive bank and raised beach landform mirrors Monaghan Bank on southern side of bay.
LLPA1	Millisle	 Woburn House and wooded estate Extensive area of woodland and shelter belts; Estate largely enclosed by original stone walls; Attractive swathe of planned parkland in an otherwise enclosed coastal landscape;

		 Listed Woburn house and its setting; and Attractive thatched cottage amongst original estate trees on Woburn Road.
LLPA2	Millisle	Shoreline and amenity area Extensive area of local amenity importance, including open space, walkways, beaches and a children's play areas from which there are panoramic views along the coastline and out to sea.
LLPA1	Portaferry	 Portaferry House, grounds and associated plantings Significant areas of parkland and woodland within the historic demesne provide an attractive entrance feature to the village and aspect onto Strangford Lough; Demesne lands provide attractive vistas from Strangford, the Lough and from Windmill Hill to the south of the village; Series of listed buildings including Portaferry House, lodges, gates and outbuildings; Mound near Portaferry House and medieval and post-medieval church and graveyard on the edge of the demesne at Templecraney; and Walled garden area now contains a tourist and recreational area with aquarium, playground, caravan park, paths, gardens and car parking with link to the shore.
LLPA1	Portavogie	 Area of rough grassland south of New Harbour Road Valuable area of local amenity importance which forms an attractive vista on the southern approach to Portavogie; and Coastal strip of nature conservation importance, designated as part of Outer Ards ASSI.
LLPA2	Portavogie	 Landform between Portavogie and Cloughey Localised hill and important physical feature with distinct steep embankment, ridgetop fields, raised beach area and foreshore; Landform with buffer separating the two villages of Cloughey and Portavogie, providing

		 distinctive landscape setting and dramatic approach to both villages; and Attractive local landscape feature with small local picnic area.
LLPA1	·	 Ringneill House and river corridors Locally important building and surrounding landscape gardens and mature trees comprise an important element in the local landscape; and Network of river corridors on the shores of Strangford Lough provide distinctive setting to the small settlement.

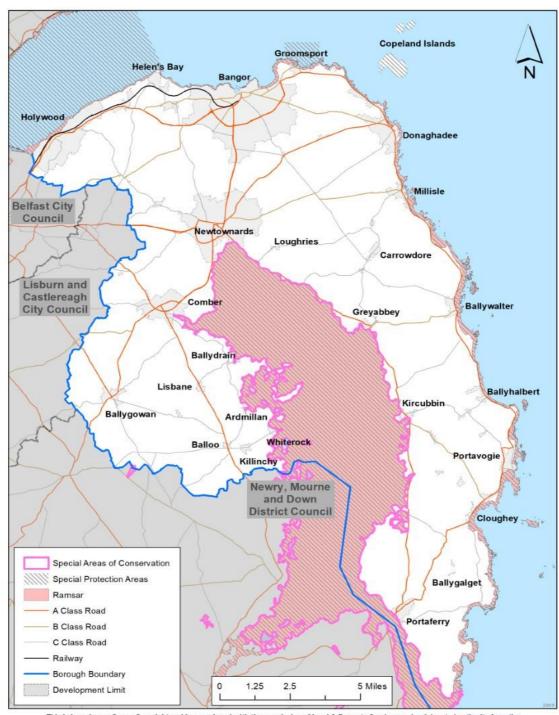
Former North Down District

Reference	Settlement	Name and Characteristics of interest
BR23	Bangor	 Carnalea Unnamed rath on steeply sloping ground with good views across Belfast Lough; Areas of local amenity importance including Carnalea Golf Course and the North Down Coastal Path; and Tree lined walkway adjacent to an unnamed stream, extending from Crawfordsburn Road towards the coastal pathway.
BR27	Bangor	 Lukes Point Lukes Point is a coastal headland which includes Kingsland Recreational Grounds - comprises tennis courts, putting green and a miniature golf course; Playground; and Ballyholme Yacht Club.
BR29	Bangor	 Stricklands Glen Stricklands Glen – a deeply incised and heavily wooded natural glen with a number of water features; and

		North Down Coastal pathway and Glen Road.
BR31	Bangor	 Wilsons Point Bangor Abbey and surroundings; Listed Buildings including McKee Clock, Bangor Harbour and Seacourt walled garden; and Area of the North Down Coastal Path with associated structure planting and the bandstand in Marine Gardens; and Playground, pools and miniature railway in Pickie Funpark.
HD14	Holywood	 Marino/Cultra A narrow coastal strip located on the seaward side of North Down Coastal Path and Seafront Road; and Panoramic views of Belfast Lough extending from Farmhill Road to the grounds of the Transport Museum.
HD17	Holywood	 Seapark Unnamed archaeological enclosure on an area of ground sloping gently down in a NW direction with good views of Belfast Lough to the north; Seapark Recreation Grounds – municipal coastal park which includes playing fields, tennis courts and a playground with panoramic views across Belfast Lough to Jordanstown and Carrickfergus; and Vegetation along the adjoining railway embankment which is of local nature conservation interest.
GR07	Groomsport	 Groomsport Shoreline Fort Hill and the harbour archaeological sites; Ballymacormick Point, Sheep Pont, the beach and recreational space; and Locally significant buildings such as the cottages to the west of the pier and a group of orlits at Andrews Shorefield.
GR08	Groomsport	Main Street

		 Groomsport Presbyterian Church (1840s) is a listed building.
HY04	Helens Bay	 Crawfordsburn Country Park Grey Point – which is a state care monument, with attractive setting and excellent views; Crawfordsburn Country Park; Helen's Bay Golf Course; and Listed buildings within the country park.
SL06	Seahill	 Seahill Coastal Area Royal Belfast golf course; Camphill Community at Glencraig; and Listed buildings of local importance including Craigdarragh House (St. Columbanus), Fairholme House, Rathmoyle, Lorne, Royal Belfast clubhouse, Comgall Hall and Rockport School.
OK02	Orlock	 West of Orlock The line of a pre-1830s road; and Several fields along the coast to the west of the settlement of Orlock.
OK04	Orlock	 Orlock Lane 19th Century coastguard cottages and their surroundings; and A Second World War observation post.

Appendix C – Map of International Coastal Nature Conservation designations in Ards and North Down



Appendix D – Areas of Special Scientific Interest (ASSIs) on Ards and North Down Coast

Name	Characteristics
BALLYMACORMICK POINT, BANGOR	This area is of special scientific interest because of the diversity of wildlife that it supports. Ballymacormick Point lies on a low, indented, rocky coastline with small promontories, sandy bays and islands. The seashore is
Reference: ASSI 3	composed of a number of Ordovician rock ridges running parallel to the water line, interspersed with areas of boulder,
Declared date: 13/05/1998 Area: 39ha	sand and mud. This broken topography results in a large range of sub-habitats including rock pools, crevices, gullies, cobble shores and areas of mud. This in turn creates a richness and diversity of flora and fauna.
	The upper shore salt marshes contain several plant species that have limited distribution in Northern Ireland. There are some fine transitions from saltmarsh to non-tidal fen and flush vegetation. The occurrence of many rock pools at different levels gives rise to an exceptional diversity of algal species and Ballymacormick Point is one of the richest sites for algae in Northern Ireland.
	Unusual or rare species of both marine and terrestrial invertebrates can be found at the site. Examples include Cushion-star, Edible Sea-urchin, Daisy Anemone and the Heteropteran Bug. Locally or nationally scarce vascular plant species that are represented here include Narrow-leaved Eelgrass, Lax-flowered Lavender and Saltmarsh Flat Sedge.
	The site is of national importance for its breeding colony of Arctic Terns on Cockle Island. The colony currently holds over 4% of the total Irish population of this species.
BALLYQUINTIN POINT, PORTAFERRRY	The area is of special scientific interest because of its coastal flora and fauna and exceptional raised beach features. Although major raised beach complexes are present elsewhere in NI, none exhibit such an extensive area and thickness of cobble grade material. During the

Reference: ASSI 87

regressive phase of the last glaciation a series of cobble-

grade ridges developed parallel to the shore.

Declared date: 30/05/1995

Area: 74.1ha

The vegetation at Ballyquintin Point illustrates a natural transition from maritime to terrestrial communities.

Saltmarsh is nestled amongst the rocky outcrops and shingle bars and includes species such as Red Fescue,

Autumn Hawkbit and Silverweed.

Ballyquintin Point contains a number of scarce plants including Slender Spikerush. The rare Pill Woodlouse occurs here at its most northerly site in Ireland.

DONAGHADEE

COPELAND ISLANDS, The ASSI encompasses all three isles. The islands are important sites for breeding seabirds and waders, in addition to their coastal plant communities and geological

Reference: ASSI 232

features.

Declared date: 31/03/2004

Area: 201.52ha

The rocks here date from 400 million years ago and contain amongst the best examples of intruded volcanic rocks of this age in NI. Big Copeland contains the most diverse range of habitats. Communities influenced by the sea are found around the shore with maritime cliff vegetation and pockets of saltmarsh also present. The vegetation on Lighthouse Island consists of short turf with large areas of Bracken and Himalayan Balsam. Mew Island is dominated by stands of grass and bracken.

The islands are internationally important breeding sites for Manx Shearwater and Arctic Tern and nationally important sites for breeding Mediterranean Gull, Common Gull and Eider Duck. The Manx Shearwater colony on the Copeland Islands accounts for 1.7% of the world population. The Artic Tern colony consists of 550 pairs – the largest colony for the species in Ireland.

Other breeding species of note include Black Guillemot, Stock Dove and Water Rail. Breeding waders such as Lapwing and Snipe may be found further inland. Grey Seal and Common Seal can be found off the Copeland Islands in significant numbers. They utilise the off-shore islands as reefs and haul-outs and as pupping and mating sites.

OUTER BELFAST LOUGH

Reference: ASSI 104

Declared date: 20/11/1996

Area: 228.57ha

Outer Belfast Lough is a structurally defined feature, possibly making the continuation of the major Southern Uplands Fault from Scotland to Ireland. The oldest rocks in the area are Ordovician in age and consist of Sandstone, Shale and Mudstone. The outcrop from Horse Rock to Grey Point is of national significance, representing a classic association of pillow lava, black mudstone and greywacke. the black mudstones, in particular contain fossil graptolites. Carboniferous rocks occur on the shore near Cultra and have been of considerable interest since the earliest days of Irish Geology.

The main concentration of botanical interest is found along the indented rocky shoreline of the SE shore. Here, sheltered bays and inlets contain small pockets of beach-head saltmarsh. Shores with harder rocks support vegetation typical of maritime cliff ledges, generally giving way to maritime grassland and heath.

Birds from Inner Belfast Lough regularly use Outer Belfast Lough for feeding and the population of the two areas are closely linked. However, the area is significant in its own right and contains nationally important species of overwintering birds including Great Crested Grebe, Ringed Plover, Turnstone and Oystercatcher.

Seals are a notable feature within the site with a number of significant 'haul-outs' utilised by both Grey Seal and Common Seal.

OUTER ARDS

Reference: ASSI 105

Declared date: 14/12/2001

Area 1116.16ha

The Outer Ards coast is composed of Lower Palaeozoic sedimentary rocks, strongly faulted, folded and weakly metamorphosed. Orlock Bridge offers the most spectacular example of fault associated rock deformation in Ireland. Coalpit Bay, near Donaghadee, contains the best developed and most historically important outcrop of Moffat Shales in Ireland. This is a condensed succession of grey and black, fossiliferous, graptolitic shales.

The maritime vegetation along this exposed coastline has been strongly influenced by physiography and human activity. Some areas still display the natural transition from marine to pedestrian vegetation and incorporated within these transitions are a number of notable vegetation communities including those characterised by Sea-purslane and Saltmarsh Flat-sedge. At least 17 rare or local plant species have been recorded in the area.

The Outer Ards is also of significance for its marine biology. It is the most sheltered stretch of open rocky coast in Northern Ireland and consequently exhibits a greater species richness than other open coast sites. The shores of particular conservation interest include Down Rock, Foreland Point and Kearney, where a variety of brown and green seaweed types are present.

With a long-established tern colony at Cockle Island, Groomsport holds an internationally significant population of Arctic Tern. Notable numbers of Sandwich Tern and Common Tern also breed at this site. The Outer Ards coastline is also of international importance for Light Bellied Brent Geese, Turnstone, Ringes Plover and Golden Plover.

There are significant populations of both Grey Seal and Common Seal, who use off-shore islands and reefs as haulouts, pupping and mating sites.

STRANGFORD LOUGH

PART 1 ASSI 6 1549ha

PART 2 ASSI 32 699ha

PART 3 ASSI 34 1859ha Strangford Lough as a whole is one of the largest sea loughs in Northern Ireland and possesses a unique landscape of drowned drumlins and raised beach terraces, which have been shaped by Quaternary glaciation. The drumlins display various stages of wave erosion, with a number of them reduced to rocky islets and reefs. The diversity of habitats is internationally renowned.

Part 1 contains extensive mudflats and rocky intertidal habitat, which support luxuriant beds of eelgrass and are of great importance as feeding areas for wintering wildfowl and waders. Pale-bellied Brent Geese, Redshank, Knot and Wigeon are all of international importance. North Boretree Rock supports one of the largest colonies of Common Seal in the Lough.

Part 2 contains representative areas of intertidal habitat, ranging from soft mudflats to steeply faced bedrock. The exceptional flow of water through The Narrows gives rise to an extremely diverse flora and fauna. Large numbers of filter-feeding organisms take advantage of the high plankton turnover such as Sponges, Anemone, sea-squirts, worms and Devonshire Cup Coral.

Part 3 contains a great diversity of intertidal habitats. The mudflats are rich in invertebrate fauna, the principal components of the community consist of worms, molluscs, cockles and sand gaper. The very muddy and sandy shores provide excellent feeding grounds for large flocks of waders – oystercatchers, lapwing, golden plover, curlew, redshank and dunlin.

Appendix E – Map of Coastal ASSIs



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