

Local Development Plan, draft Plan Strategy (DPS) Consultation - 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 17 October 2025 and closes at 4.30pm on 15th December 2025

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.

1. **Name:**

David Donaldson

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07920873600

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

**Choose exactly 1 option*

No

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

**Choose exactly 1 option*

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

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

BRAMWELL TRUST

C/O DONALDSON PLANNING LTD

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

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

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

YES – SEE ATTACHED SUBMISSION DD14

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*

X 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*

X No

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

CE1 AND CE2

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*

X Yes

16. Test P1 Comments (optional)

N/A

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

**Choose exactly 1 option*

X Yes

18. Test P2 Comments (optional)

N/A

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

**Choose exactly 1 option*

X Yes

20. Test P3 Comments (optional)

N/A

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*

X Yes

22. Test P4 Comments (optional)

N/A

23. Consistency Tests (optional)

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

**Choose exactly 1 option*

X

Yes

24. Test C1 Comments (optional)

N/A

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

**Choose exactly 1 option*

X Yes

26. Test C2 Comments (optional)

N/A

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

**Choose exactly 1 option*

X Yes

28. Test C3 Comments (optional)

N/A

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*

X Yes

30. Test C4 Comments (optional)

N/A

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*

No

32. Test CE 1 Comments (optional)

SEE ATTACHED SUBMISSION

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*

No

33. Test CE 2 Comments (optional)

SEE ATTACHED SUBMISSION

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

**Choose exactly 1 option*

No

35. Test CE 3 Comments (optional)

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

**Choose exactly 1 option*

No

37. Test CE 4 Comments (optional)

SEE ATTACHED SUBMISSION

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 DOCUMENT

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

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

Do you have any comments?

N/A

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

Do you have any comments on the draft HRA?

N/A

41. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

42. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

43. Please add any additional comments (optional)

N/A

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.

REF: DD14

DRAFT PLAN REPRESENTATION ON BEHALF OF BRAMWELL TRUST

SUBJECT: COASTAL MANAGEMENT STRATEGY

1.0 INTRODUCTION

Chapter 16 of the DPS proposes to introduce a Coastal Management Strategy.

This response is on behalf of Bramwell Trust which owns a number of residential, commercial and agricultural properties on SketricK Island.

Legislative Context for Representations

Part 2 of the Planning (NI) Act 2011 sets out the general requirements for local development plans. This states that the purpose of the Independent Examination is to determine whether: a) it satisfies the requirements relating to preparation of the DPD; and b) whether it is 'sound'.

The soundness tests relate to procedure; consistency; and coherence and effectiveness.

In relation to this submission, the '**coherence and effectiveness tests**' are the most relevant. These are:

CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

CE2 – are the policies and allocations realistic and appropriate having considered alternatives and founded on a robust evidence base;

CE3 – there are clear mechanisms for implementation and monitoring; and

CE4 – it is reasonably flexible to deal with changing circumstances.

2.0 COASTAL MANAGEMENT STRATEGY

The protection of the sensitive coastline is clearly an important aspiration, especially in areas which are already identified for their nature conservation importance, and/or where they may be vulnerable to coastal erosion. This flows from the RDS, as stated below:

RG11 - Protect enhance and manage the coast. The quality of coastal waters needs to be raised. Coastal areas need to be protected from coastal squeeze, to safeguard against loss of distinctive habitats and to help adaptation to climate change. The landscape setting of features should be conserved. The Marine Policy Statement (March 2011) and subsequent Marine Plan(s) will provide spatial guidance and detailed policy where appropriate for the terrestrial/marine interface and the marine environment. This will be complemented by work to advance integrated coastal zone management.

It is notable that the RDS direction is aimed primarily at environmental factors such as water quality; habitats; coastal squeeze; climate change; and coastal zone management.

Technical Supplement 11 refers to the 'Big Plan' for ANDBC, and it notes that two of the outcomes are to protect from flood inundation, coastal erosion and land instability, and to restrict development in such areas:

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.

The proposed Coastal Management Strategy in the Draft Plan Strategy is below:

Coastal Management Strategy

To protect the undeveloped coast from inappropriate, excessive or obtrusive development that would cause harm to its visual amenity and natural and historic assets, whilst accommodating appropriate sustainable development in the developed coast at locations that are not at risk from coastal change (erosion, landslip and inundation).

The Coastal Management Strategy in the DPS appears to be motivated primarily by visual amenity considerations, rather than upon environmental protection advocated by Regional Guidance in the RDS. Indeed it has a much wider scope than that which emerged from the 'Big Plan'.

Considerations of visual amenity are already firmly addressed in other policies such as AONBs, and LLPAs. The Coastal Management Strategy should first and foremost be directed at protection of the natural habitat.

The DPS is unsound under CE1 and CE2 in three major respects:

- 1) The Management Strategy should focus primarily upon protection of the marine environment;
- 2) the policy provisions set out in CO1 fail to address the full range of development which may be anticipated in coastal areas; and
- 3) the extent of the area which is proposed to be designated under UZ1 is excessive, and much more extensive than that which is necessary to protect the 'undeveloped' coast.

3.0 POLICY FOR THE UNDEVELOPED COAST



Policy CO 1 The Undeveloped Coast

Planning permission will only be granted for development proposals which fall wholly or partly within the Ards and North Down Undeveloped Coastal Zone (AND UCZ) where it is demonstrated that all the following criteria are met:

- a) the proposal is of national or regional importance;
- b) there is a clear site-specific need for the proposed development;
- c) there is no feasible alternative site available inside development limits of settlements; and
- d) it will not have an unacceptable impact either directly, indirectly or cumulatively upon the coastal environment or its setting, including any asset associated with the natural³, coastal or historic environment.

The following exceptions will not be required to demonstrate compliance with criteria (a), (b) and (c) but will still be expected to comply with criterion (d):

- The creation or enhancement of public access to the coast e.g. coastal paths and greenways, where a clear community benefit is demonstrated;
- Water based recreation which contributes positively to public enjoyment of the coast (such proposals must also comply with policy OS8);
- The delivery of small-scale environmental benefit projects e.g. creation of wildlife habitats
- Householder development e.g. residential extensions, alterations, sheds and garages, within the curtilage of the existing dwelling; and
- The erection of a replacement dwelling in line with the policy provisions of HOU 10 Replacement Dwellings.

As drafted, Policy CO1 must be regarded as unsound.

Whilst the policy envisages exceptions for householder development within existing curtilages, and for replacement dwellings, it fails to address a range of development types which might be anticipated in coastal areas, including:

- 1) development on farms (eg replacement sheds or essential new sheds for animal welfare etc);
- 2) farm diversification projects;
- 3) changes of use or replacement of existing buildings;
- 4) extensions or alterations to existing non-domestic buildings;
- 5) tourism developments which have a coastal focus; or
- 6) developments (eg amenity buildings, play areas, improved facilities etc) within established caravan or holiday parks.

All of the above are developments which may be acceptable without adverse impact upon the landscape quality or natural environment of the coast. As drafted, Policy CO1 would appear to preclude any such proposals.

It is useful to compare Policy CO1 of the DPS with the equivalent policy in the Newry Mourne and Down Draft Strategy (extract below). This is significantly more comprehensive as its

guidance facilitates a greater range of developments (including agriculture, tourism, utilities etc) which may be anticipated:

- There will be a presumption against all new development other than in exceptional circumstances within the undeveloped coastal zone. A proposal must fully demonstrate that it constitutes one of the exceptions listed below and that it meets Strategic Policy CDS1:
- a The proposed development is for the in-situ replacement of an existing dwelling or agricultural building, provided that:
 - the size and structure of the building would not have a visual impact significantly greater to the building it is to replace; or
 - b The proposed development is for the off-site replacement of an existing dwelling or agricultural building beyond the undeveloped coast provided it is in close proximity to the site of the building that it replaces, and:
 - the size and structure of the building would not have a visual impact significantly greater to the building it is to replace;
 - the development is in proportion to and respects the character, form and appearance of the surrounding area; or
 - c The proposal relates to the extension or alteration of an existing dwelling; or
 - d The proposed development relates to the provision of appropriate open space, pathways or recreational facilities for the enjoyment of the public; or
 - e The proposed development is a Council led or supported tourism project at an existing tourist/visitor site; or
 - f The proposal is for maintenance and/or replacement of an existing water compatible development such as for boat mooring, navigation, and water based recreational use; or
 - g The proposal relates to development for agriculture, aquaculture and fisheries use, transport or utilities infrastructure, which demonstrates that for operational reasons an undeveloped coastal location is necessary and that there is no suitable alternative site outside the undeveloped coast; or
 - h Proposals for a new harbour, port or marina or the extension of an existing harbour, port or marina within or into the undeveloped coast must demonstrate that:
 - the development requires a harbour/port/marina-side location or is ancillary to activities taking place within

Extract from NMD Policy CO1

In a plan led system it is important to ensure that the Plan provides adequate guidance and a degree of certainty for all forms of development. As drafted, Policy CO1 is unduly rigid and fails to provide policy guidance for the wide spectrum of development which may be anticipated from time to time in coastal areas. Its unduly restrictive approach is not evidence based and must be regarded as unsound under CE2.

4.0 PROPOSED DESIGNATION UCZ1

A major issue with the PS is that the proposed designation of the undeveloped coastal zone is excessive. It goes well beyond the SPPS guidance:

6.45 Some coastal areas may be unsuitable for development due to their amenity or landscape value, nature conservation interest or historical or archaeological importance. The LDP should identify areas where development should be restricted to take account of these interests of acknowledged importance.

6.46 LDPs should identify areas of the coast known to be at risk from flooding, coastal erosion, or land instability where new development should not be permitted.

Whilst there is no issue with the identification of the outer edge of the coastal zone (ie low water mark) the proposed designation includes not just the coastline, but significant areas of land which are well away from coastline and cannot reasonably be described as 'undeveloped'.

Technical Supplement 11 sets out the rationale for the designation of the undeveloped area under UZ1. This includes:

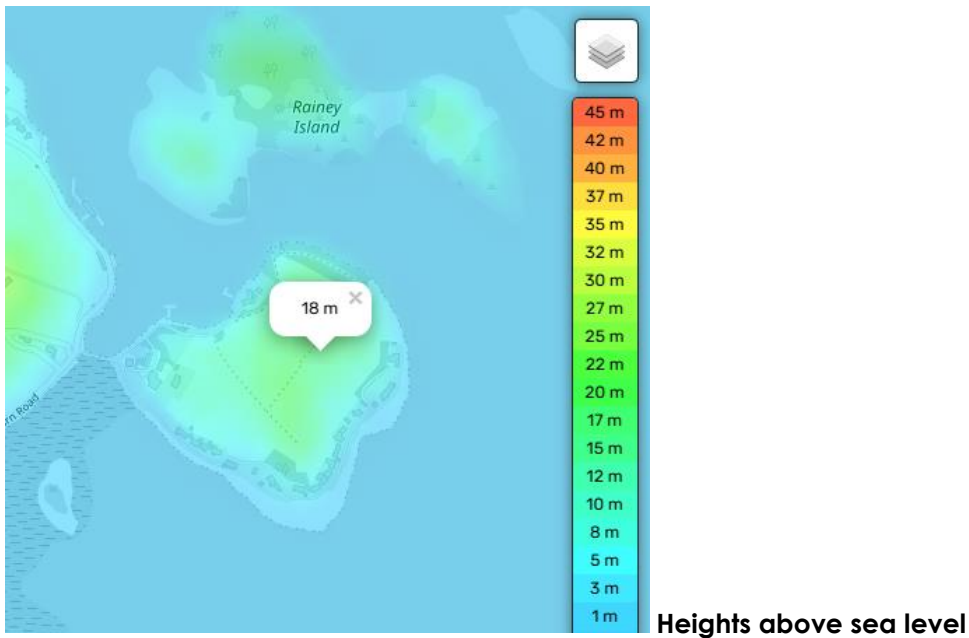
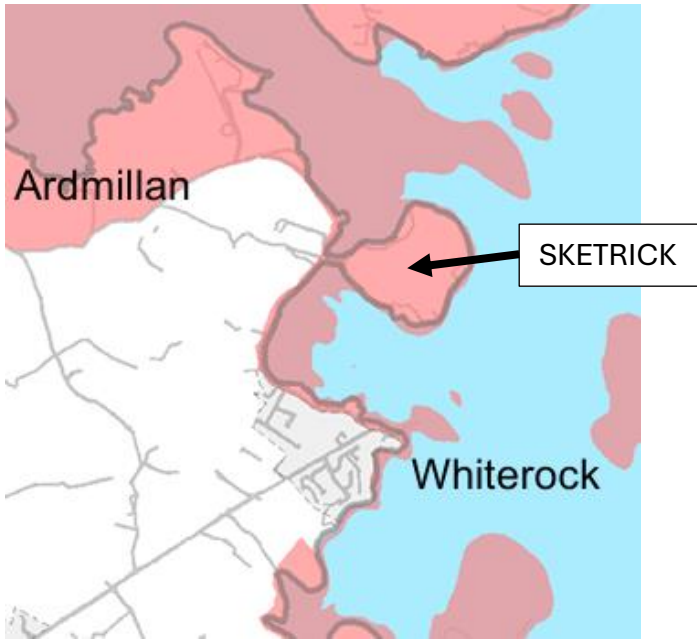
- use of the **5m contour** as a starting point for the spatial extent of the landward side of the zone;
- **headlands and other coastal projections** such as Orlock Point, Ballymacormick Point and Ballyquintin were considered to be significant coastal features of high amenity value and were included 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; and
- **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.

Whilst the 5m contour may be reasonable as a '**starting point**', it is evident that the proposed designation fluctuates considerably, with some areas of land below 5 metres excluded from UZ1 and multiple areas well above 5 metres included in UZ1.

Furthermore, it is illogical to regard established caravan parks etc as 'undeveloped' when they are plainly long established and already form part of the landscape character. Such caravan parks make a substantial contribution to the local economy in the Ards Peninsula.

There are also substantial areas of farmland and building groups included (eg to the north of Portaferry and to north of Greyabbey) which again are part of the established landscape character.

The entirety of Sketrick Island is included, when this already contains tourist amenities, a pub/restaurant, a castle, and multiple houses.



The proposed UZ1 designation is unrealistic and excessive. It is unsound.

5.0 CONCLUSIONS

The Plan Strategy's coastal management policies and designations are neither realistic nor appropriate. They are not based upon a robust evidence base. They should be amended as follows:

1. **The Coastal Management Strategy should be clarified to relate to protection of natural habitats and address matters such as coastal erosion. It should not be directed primarily at visual amenity as this can be protected under other LLPA and AONB policies.**

2. Policy CO1 must be comprehensively redrafted to recognise that there are other forms of development which may be satisfactorily accommodated (eg tourism) in coastal areas
3. Designation UZ1 should exclude areas where there is already significant development (eg caravan parks, farmsteads, groups of houses etc). It must also be comprehensively revised to focus upon the areas in direct proximity to the shoreline, and primarily those areas which are designated for their nature conservation importance or which are at clear risk of erosion.

In the alternative, Designation UZ1 should be removed from the Plan Strategy pending further analysis and study.

DONALDSON PLANNING

FEBRUARY 2026