

FORMAL REPRESENTATION TO ANDBC LOCAL DEVELOPMENT PLAN 2032

Representation on behalf of the Residents of 174, 176 and 186 Whitechurch Road, Ballywalter, BT22 2JZ
Ards & North Down Borough Council – Draft Plan Strategy 2032

1. INTRODUCTION

This representation is submitted on behalf of the residents of **174, 176 and 186 Whitechurch Road, Ballywalter**, who are directly affected by the Draft Plan Strategy (DPS) 2032.

The submission addresses:

1. **Soundness objections** to several policies and elements of the DPS
2. A formal **objection to the Undeveloped Coastal Zone (UCZ1)** designation along the Ballywalter/Whitechurch coast
3. **Three site-specific rezoning requests**, as follows:

(a) Land adjacent to Sandycove Holiday Park (191 Whitechurch Road) - (Agricultural References 3/003/096/1/A, 3/003/096/1/B and 3/003/096/2)

For **commercial/industrial zoning**, enabling:

- tourism expansion
- a solar energy array
- caravan recycling, maintenance or storage
- support infrastructure for the local tourism industry

(b) Agricultural field at 176 and 186 Whitechurch Road - (Agricultural References 3/003/733/9 and 3/003/096/4)

For **mixed-use small-scale development**, including:

- residential housing
- tourism expansion
- industrial buildings supporting the tourism sector

(c) Agricultural land to the rear of 176 and 186 Whitechurch Road (Agricultural Reference 3/003/015/2)

For:

- small-scale residential development (supported by NI Water sewer routing and NI Electricity Network extension)
- tourism roll-back capacity
- industrial/renewable energy uses, including **solar**, given proximity to **3-phase electrical network**

Each request is **infrastructure-led, policy compliant**, and consistent with **rural regeneration, climate adaptation** and **tourism sector modernisation**.

This representation demonstrates that the DPS, as drafted, is **unsound**, is contrary to SPPS principles, and fails to appropriately plan for rural communities, sustainable tourism growth, and infrastructure-led development.

2. SOUNDNESS OBJECTIONS

The following components of the DPS are **unsound** under DPPN06.

Below are the principal unsound elements.

2.1 POLICY UCZ1 – ARDS & NORTH DOWN ‘UNDEVELOPED COASTAL ZONE’

SOUNDNESS FAILURES:

- **CE1 – Evidence Base** incomplete
- **CE2 – Justification not shown**
- **C3 – Internal consistency**
- **C4 – External consistency with SPPS**

Reasoning:

i. **No updated evidence base**

The Council has not used available **DAERA Coastal Observatory** datasets showing:

- **low erosion susceptibility** along this section of the Ards coastline.
- **stability of defended and reclaimed shoreline units**
- absence of recorded **coastal retreat pressures**
These characteristics are materially different from more exposed UCZ areas to the east and south.

ii. **Not landscape-led**

The land adjacent to 174, 176, 186 & 191 Whitechurch Road:

- **is agriculturally modified**
- **lies set back from the shoreline**
- is visually contained
- sits within a **built tourism corridor**, which includes a NI Water Pumping station and is not an undeveloped coast
- according to the DAERA Coastal Change information tool “this stretch of coastline has shown growth since the 1st edition map period.”

iii. **Contradicts the SPPS approach**

UCZ1 fails to:

- balance environmental protection with **economic and social needs**
- reflect the SPPS requirement to **differentiate** based on local coastal character

iv. **Inconsistent application**

Bangor Marina and other modified coastline areas are **excluded**, despite far higher built influence. The UCZ boundary does not acknowledge the **existing built context**:

- Ballyferris Holiday Park (450 Licenced Pitches), ancillary buildings and residential property
- Sandycove Holiday Park (160 Licenced Pitches), ancillary buildings and residential property
- Sandend Holiday Park (112 Licenced Pitches) and ancillary buildings
- Springvale Holiday Park (70 Licenced Pitches) and ancillary building

Along with Ganaway Holiday Park (123 Licenced Pitches) and ancillary buildings, these collectively form one of the most well-known and established caravan/tourism clusters in Northern Ireland.

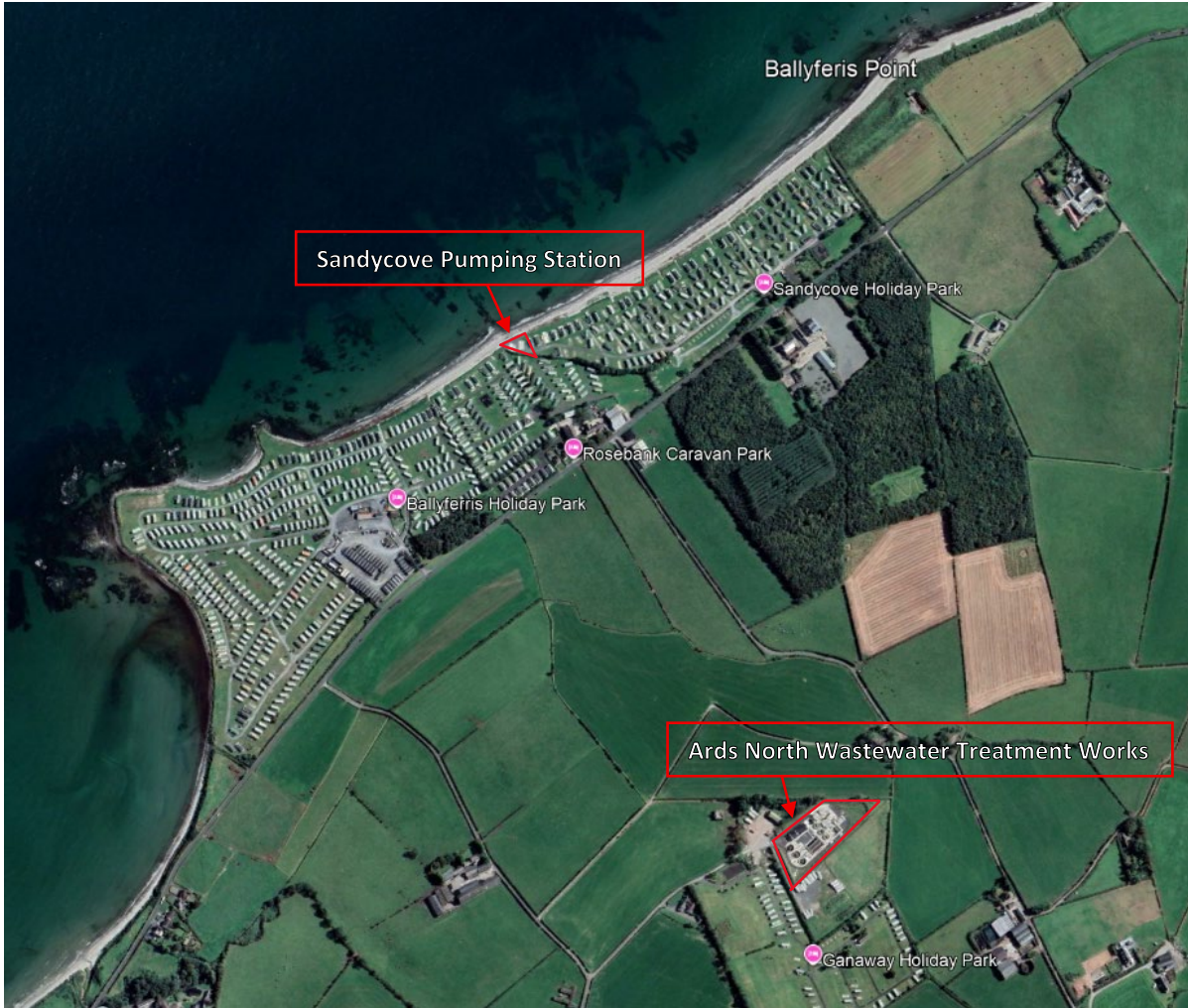
v. **No economic impact assessment**

A designation constraining the **largest tourism cluster in the Ards and North Down Borough** (Ballyferris–Sandycove–Sandend–Springvale) is unjustified without supporting evaluation.

Result: **UCZ1 must be amended or removed for this section**, failing CE1, CE2 and C4.

2.2 FAILURE TO INTEGRATE NEW INFRASTRUCTURE EVIDENCE

SOUNDNESS FAILURES: CE2, CE3



The Council continues to cite wastewater constraints, yet NI Water have developed the Ards North wastewater treatment works which serves local residences and caravan parks. Included in the project is the Sandy Cove pumping station which is located on and accessed by Sandy Cove Holiday Park. (<https://waterprojectsonline.com/case-studies/ards-north-wwtw-2023/>)

- NI Water has now installed a **new gravity sewer main** to service:
 - 174 Whitechurch Road
 - 176 Whitechurch Road
 - 186 Whitechurch Road
 - Sandy Cove Holiday Park, 191 Whitechurch Road

- Agricultural field between 176 and 186 Whitechurch Road
- Agricultural field adjacent to Sandycove Holiday Park (Fig.1. Page 1)
- The extension of NI Electricity’s 3-phase electricity distribution network

This materially alters:

- **development capacity**
- **environmental constraints**
- **settlement strategy justification**

The DPS fails to incorporate this new infrastructure and is therefore inconsistent with:

- **SPPS (Infrastructure first)**
- **RDS RG5 (Strengthening the rural economy)**
- **NDNA commitments to wastewater investment**

This undermines the coherence and robustness of SGS1, SGS2, SGS4 and HOU policies. Failure to incorporate this known evidence renders SGS and HOU policies **unsound**.

2.3 TSM 6 AND RELATED TOURISM POLICIES

SOUNDNESS FAILURE: C3 & CE4

The DPS incorrectly asserts that **glamping units fall outside the statutory definition of a caravan**, contradicting:

- The **Caravans Act (NI) 1963**
- The **Caravans Act (NI) 2011**
- Multiple planning approvals across Northern Ireland
- The design parameters of **BS 3632, BS 8642:2024, and EN 1647**

Holiday lodges, S-Pods, micro-lodges and similar structures meet the legal tests for being “designed or adapted for human habitation” AND being capable of being moved in one or two sections.

The misinterpretation leads to:

- incorrect policy restrictions
- unnecessary compliance burdens
- differentiation between unit types that planning law does not recognise

This contradicts:

- **SPPS – Supporting Tourism**
- **Annex G – Landscape Design Considerations for Holiday Parks**

TSM 6 therefore fails **C3 (internal coherence)** and **CE4 (alignment with regional policy & law)**.

The DPS ignores SPPS and RDS direction on **sustainable rural tourism modernisation**

This obstructs **managed improvement, renewables, and roll-back adaptation** that DAERA actively promotes in coastal planning.



Fig. 1. The area highlighted in pink is the proposed 'Undeveloped Coastal Zone' (UCZ)

3. OBJECTION TO THE UNDEVELOPED COASTAL ZONE (UCZ1)

3.1 THE DESIGNATIONS ARE EXCESSIVE AND NOT LANDSCAPE-LED

The Ballywalter coastline adjacent properties 174 to 211 (between lines AB and iJ) Whitechurch Road is:

- heavily modified
- bordered by intensively farmed land
- adjacent to long-established caravan parks, their buildings, and residential properties,
- partially serviced by NI Water sewer infrastructure
- peppered with existing development clusters

It does **not** meet the characteristics of an “undeveloped coast” (SPPS definition).

3.2 UCZ1 UNDERMINES RURAL REGENERATION AND THE PENINSULA ECONOMY

The Ards Peninsula relies on:

- static caravan tourism
- local employment linked to holiday parks
- seasonal visitor expenditure
- rural population retention

The UCZ designation prohibits:

- rationalisation of existing holiday parks
- provision of tourism infrastructure
- local housing needed to sustain community services

This is contrary to:

- SPPS (Supporting the economy)
- the Council’s own Tourism Strategy (“Blue:Green Creatively Connected”)
- RDS directives for coastal development in managed areas

3.3 FAILURE TO DISTINGUISH BETWEEN SENSITIVE AND NON-SENSITIVE COASTLINE

The designation covers land:

- already impacted by development

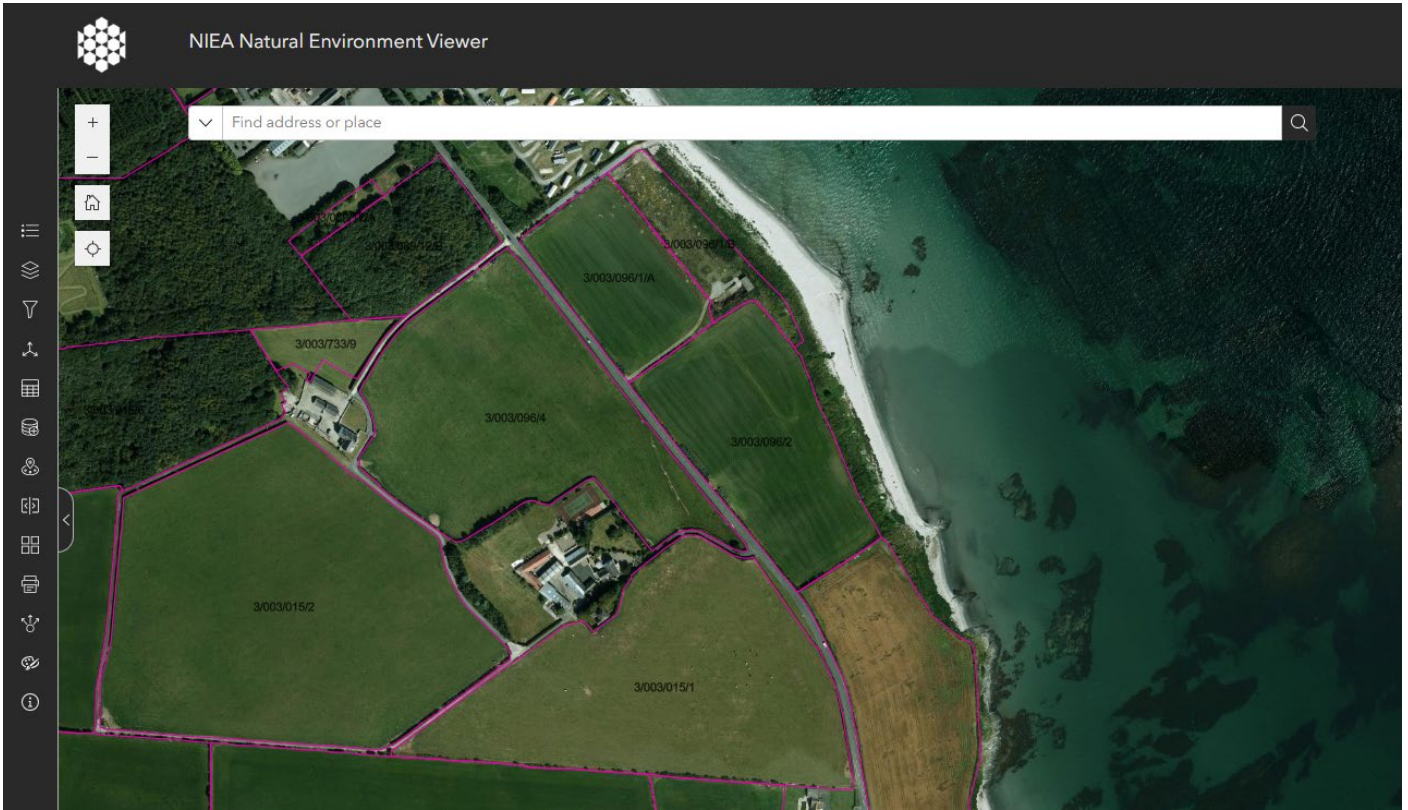
- already visually enclosed by vegetation and topography
- outside any statutory nature designation
- adjacent to infrastructure corridors (sewer, power, telecommunications)

This indiscriminate approach is not evidence-led.

3.4 FAILURE TO CONSIDER CLIMATE ADAPTATION REALISTICALLY

The coastline adjacent to 174 and 186 (between lines GH and ij on Fig. 1.) is **elevated, not prone to coastal erosion, and not within a Flood Zone.**

The UCZ designation is not justified by any Flood Map NI designation or Coastal Erosion Risk Map.



NIEA Natural Environment Viewer showing agricultural boundaries (and field references).

4. REZONING REQUEST – TOURISM EXPANSION LAND ADJACENT TO SANDYCOVE HOLIDAY PARK (AGRICULTURAL REFERENCES 3/003/096/1/A, 3/003/096/1/B AND 3/003/096/2)

REQUESTED ZONING: COMMERCIAL / INDUSTRIAL

(e.g., tourism support uses, caravan recycling, solar generation, storage)



Fig. 2. Land adjacent to Sandy Cove Holiday Park (land between lines GH and IJ on Fig. 1.) outlined in red. Yellow circle denotes main sewer connection coming from 174, 176 and 186 Whitechurch Road going through Sandy Cove Holiday Park to Sandy Cove Pumping Station. There is a silo which is currently being utilised by all of Sandy Cove Holiday Homes Ltd's caravan parks.

4.1 PLANNING JUSTIFICATION

4.1.1 THIS LAND IS IDEALLY SUITED FOR REZONING BECAUSE:

i. **Strategic Tourism Location**

The site sits within one of the **largest continuous tourism corridor** in Northern Ireland, with over **800 pitches** in immediate proximity.

ii. **Meets SPPS & RDS Objectives**

- a. supports rural economy
- b. enables diversification
- c. strengthens employment base

iii. **Holiday park expansion allows for:**

- a. modernisation
- b. improved landscaping
- c. enhanced biodiversity connectivity

- d. decarbonisation infrastructure (solar, heat pumps, energy storage)
 - e. safe caravan recycling & storage area
 - f. Pitch reconfiguration and improvement
- iv. The land is **already crossed** by NI Water’s new sewer — the defining infrastructure constraint previously cited by Council. Can be serviced by existing electrical and water installations from Sandycove Holiday Park.

4.1.2 CLIMATE & ENERGY ALIGNMENT

The site is suitable for:

- **solar array installation**
 - battery storage
 - grid support
- reducing diesel generator emissions and aligning with NI's **Energy Strategy 2021-2040**.



Fig. 3. DEARA Northern Ireland Marine Mapviewer showing ASSI/Ramsar area highlighted.

4.1.3 DAERA COASTAL OBSERVATORY RELEVANCE

Data identifies this stretch as:

- **Outside of ASSI/Ramsar designation**

- **low susceptibility** shoreline
- **stable hinterland** with no projected erosion retreat making it appropriate for **non-vulnerable uses** such as industrial or renewable energy.

EXPANSION SUPPORTS THE BOROUGH'S TOURISM STRATEGY AND HELPS DELIVER THE LDP'S ECONOMIC OBJECTIVES.

4.2 POLICY ALIGNMENT

- ✓ **SPPS Tourism** – supports expansion of existing tourism facilities
- ✓ **RDS RG5** – strengthen rural tourism
- ✓ **TSM6** – supports extensions to existing holiday parks
- ✓ **Annex G** – the site meets the landscape criteria for extensions
- ✓ **Climate policies** – allows renewable energy installations serving the park

4.3 COMMUNITY BENEFITS

Caravan parks support:

- local retailers
- restaurants
- tradespeople
- year-round employment
- public transport viability

Rezoning this land is fully consistent with a **sustainable rural economy**.

5. REZONING REQUEST FOR LAND ADJACENT TO 176 AND 186 WHITCHURCH ROAD (AGRICULTURAL REFERENCES 3/003/733/9 AND 3/003/096/4)

REQUESTED ZONING: MIXED-USE
(HOUSING + TOURISM + LIGHT INDUSTRIAL)



Fig 3. Land at 176 and 186 Whitechurch Road outlined in red.

5.1 INFRASTRUCTURE-LED JUSTIFICATION

The **new NI Water gravity sewer main** installed across this field fundamentally changes the planning context. Historically, Ballywalter's growth was constrained by lack of wastewater capacity. That constraint is now removed. The development of the Ards North Waste Water Treatment works were conditional on these properties, 174, 176 and 186 Whitechurch Road, as well as Sandycove, Ballyferris and Ganaway Holiday Parks receiving connections to the main sewer from NI Water. Capacity was built into the installations to allow for future development.



Fig 4. MH16 and MH17 during installation

Under the SPPS and RDS:

Infrastructure-led development should be prioritised.

5.2 SETTLEMENT NEEDS

Ballywalter is experiencing:

- population decline
- ageing demographic
- shortage of modest family homes and downsizer homes
- limited supply inside SDL
- housing pressure along the Whitechurch Road corridor

Small-scale housing (6–12 units) here would:

- strengthen local services
- support the primary school
- retain younger families
- improve socio-economic balance

5.3 SUPPORTING TOURISM FUNCTIONALITY

Light industrial buildings could provide:

- Tourism Roll-back
- Laundry, boat storage, IT infrastructure and maintenance services
- equipment storage
- secure caravan holding
- waste management compliant with **DAERA circular economy principles**

5.4 LANDSCAPE & ENVIRONMENTAL COMPATIBILITY

The field:

- is visually enclosed

- sits between two residential properties
- lies outside ASSI, Ramsar, SPA and SAC environmental designations
- is not coastal in character
- is already altered by the NI Water sewer works

This is consistent with **HOU9 clusters** and **HOU14 non-agricultural enterprises** principles.

5.4 SOUND PLANNING REASONS SUPPORTING REZONING

- It avoids pressured or sensitive areas
- It is compatible with existing settlement form
- It is infrastructure-ready
- It addresses real identified housing need

5.5 SOUNDNESS

Failure to consider this site contradicts **CE2** (not using available evidence) and **C3** (inconsistent settlement approach).



Fig 5. Super imposed image of gravity sewer serving 174, 176 and 186 Whitechurch Road. 3-phase electric supply to pole (indicated by Red circle) and the additional manhole (indicated by the yellow circle) with connection spur into the field was installed to facilitate future caravan park expansion.

6. REZONING REQUEST C – LAND TO REAR OF 176 AND 186 WHITECHURCH ROAD (AGRICULTURAL REFERENCE 3/003/015/2)

REQUESTED ZONING: RESIDENTIAL / TOURISM ROLL-BACK / INDUSTRIAL FOR SOLAR & GRID SUPPORT



Fig 6. Land to the rear of 186 and 176 Whitechurch for proposed rezoning.

6.1 PLANNING JUSTIFICATION

6.1.1 PROXIMITY TO INFRASTRUCTURE

- sits adjacent to the new **NI Water gravity sewer**
- lies close to an existing **3-phase electricity network**, enabling:

- solar array export
- grid balancing
- EV charging infrastructure
- low-carbon heat support

6.1.2 CLIMATE ADAPTATION & ROLL-BACK

DAERA Coastal Observatory promotes:

- **roll-back of coastal assets inland** where appropriate
- managed relocation rather than abandonment

This land provides:

- space for tourism units currently nearer the shoreline
- future-proofing of the sector

6.1.3 LOW ENVIRONMENTAL SENSITIVITY

The site:

- is not within flood hazard zones
- sits outside ASSI, Ramsar, SPA and SAC layers
- is visually enclosed
- has **stable inland coastal morphology** per DAERA datasets

6.1.4 RESIDENTIAL NEED

Small-scale housing here would:

- round off existing development
- avoid ribbon sprawl
- contribute to settlement vitality

7. REQUESTED MODIFICATIONS

1. **Amend UCZ1 to exclude areas** from the Undeveloped Coastal Zone (areas between lines AB to CD, and EF to ij on Fig. 1.)
2. **Rezone Agricultural land adjacent to Whitechurch Road** to commercial/industrial (land between GH and ij on Fig. 1. - Agricultural References 3/003/096/1/A, 3/003/096/1/B and 3/003/096/2)
3. **Rezone land beside 176 & 186 Whitechurch Road** to mixed-use (Agricultural References 3/003/733/9 and 3/003/096/4)
4. **Rezone land to rear of 176–186 Whitechurch Road** to residential/tourism/industrial (Agricultural Reference 3/003/015/2)
5. **Update evidence base to reflect:**
 - NI Water sewer infrastructure
 - DAERA Coastal Observatory data
 - tourism economic significance

8. CONCLUSION

THE DPS IS UNSOUND BECAUSE IT:

- **is not based on updated evidence** (CE1 & CE2)
- **fails to integrate infrastructure investment** (CE3)
- **misapplies coastal policy** (C3 & C4)
- **undermines rural economic development** contrary to SPPS and RDS

THE REZONING REQUESTS ARE:

- ✓ proportionate
- ✓ infrastructure-led
- ✓ environmentally appropriate
- ✓ economically beneficial
- ✓ aligned with DAERA coastal management principles

APPENDIX A – NI WATER SEWER INFRASTRUCTURE MAPS

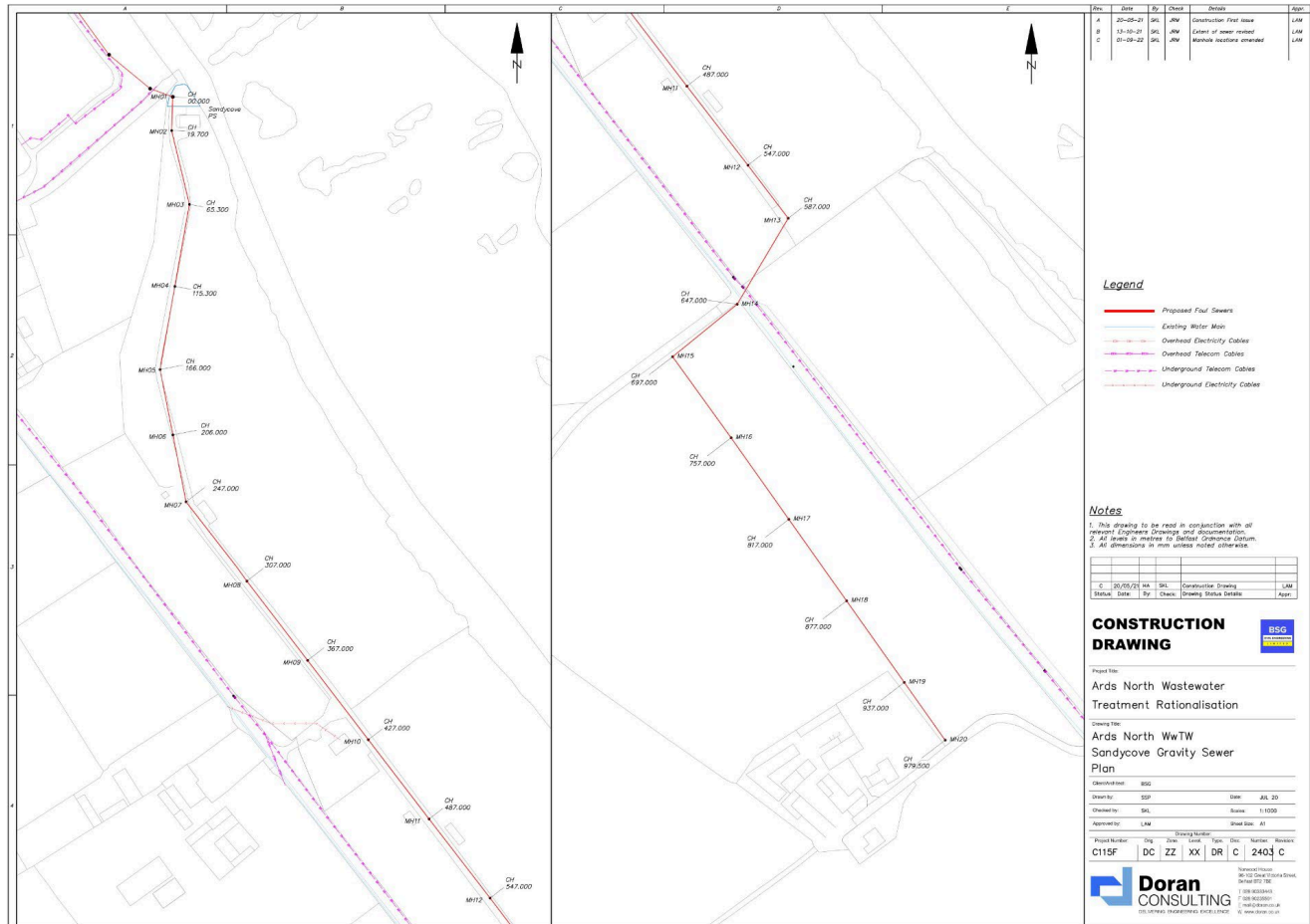


Fig. 7. Construction drawing showing the mains sewer serving properties 174, 176, 186, and Sandycove Holiday Park.