



**National
Trust**

sophie.brown1@nationaltrust.org.uk
16 March 2026

By email: planning@ardsandnorthdown.gov.uk

Dear Sir / Madam,

Response to Local Development Plan draft Plan Strategy – Consultation

Thank you for the opportunity to respond to the consultation on Ard & North Down Borough Council's Local Development Plan draft Plan Strategy.

The National Trust cares for some of the most significant natural and built heritage assets within the Borough, including Mount Stewart, Orlock Point and extensive areas of Strangford Lough. These sites are managed to ensure their protection and to safeguard their intrinsic value for the benefit of current and future generations.

A strong Plan Strategy and an effective planning system are essential for protecting this rich natural and historic environment. They play a vital role in conserving heritage, enhancing open green space and supporting outcomes that promote wellbeing, biodiversity and sustainable places for all.

Please see detailed comments on the draft Plan Strategy, attached below this letter.

Yours sincerely

Sophie Brown
External Affairs Officer

Response submitted by the National Trust to Ards & North Down Borough Council re. Local Development Plan draft Plan Strategy

16 March 2026

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

Access to green space

1. Green and blue spaces provide multiple social, economic and environmental benefits – the cross-cutting nature of access to high quality greenspaces locally is recognised within Community Planning. We welcome the Open Space Strategy and the inclusion of policies within the draft Plan Strategy (DPS) that recognise this and seek to protect and increase access to open spaces, including blue and green spaces. Policies to prevent the loss of open spaces (Policy OS1), and to ensure developers include public open space in their proposals (Policy OS2), are welcome.
2. However, the Council should ensure the right measures are in place to increase provision of quality green and blue spaces. These policies include a number of exceptions, where the benefits of open space are deprioritised in favour of other public benefits. Clearer guidance should also be included in the DPS, perhaps in the Spatial Growth Strategy, setting out how areas of new green space should be identified and prioritised within the Local Policies Plan, and ensuring new open spaces are multi-functional, delivering for both nature and people.
3. We would also like to see the monitoring framework strengthened in this area. Identifying and developing a network of green and blue infrastructure is identified as a key element in the environmental objectives of the DPS. However, no target or trigger for review is included in the monitoring framework – only a commitment to monitor the trend. We would like to see a SMART target for increasing the provision of green and blue infrastructure included in the DPS, and would suggest that the target aligns with the Programme for Government and Northern Ireland's Environmental Improvement Plan vision – for 84% of households to have access to quality natural space within 400m by 2050 – and the associated indicator (*Annual increase in % of households that have publicly accessible quality natural space >2ha within 400m and at least one site >20ha in size within 2km*”).

Nature recovery

4. The DPS recognises the value of the natural environment to people across the borough and includes welcome policies to help protect the environment. Policy NE5 recognises the importance of habitats, species and features irrespective of designations, due to their vital contribution to a future nature recovery network. We

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welcome the wording in the 'Justification and Amplification' of this policy, highlighting that "Other natural environment features that provide a significant contribution to biodiversity may include buffer areas around core designated sites, stepping stones, ecological corridors, and links, which are all vital components of a resilient Ecological Network. Irrespective of any designations or specific protection, it is important that all development proposals consider how they can conserve and enhance nature conservation, biodiversity interests and ecological connectivity". However, for clarity we would like to see reference made to nature recovery in the policy wording itself.

5. We welcome the Council's adoption of a precautionary approach when considering the impacts of any proposed development on the natural and historic environment. However, we note that reasons of "overriding public interest" can still overrule this principle.
6. Similarly, policies to protect designated areas, protected species and other important natural heritage features (Policies NE1-5) also include exceptional circumstances where development is permitted. While this approach may be standard in planning policy, and there are stricter conditions for the more highly designated areas, we are concerned that, in practice, decision-makers may still prioritise other undefined 'benefits' at the expense of the natural environment. The Council must ensure that exceptions are just that, and do not become commonplace. In addition, while appropriate mitigations and compensatory measures are required in such instances, the policy wording should be made clearer to ensure a net positive benefit for biodiversity.
7. Further, clearer guidance should also be included in the DPS, perhaps in the Natural Environment Strategy, setting out how sites for future nature restoration should be identified and prioritised within the Local Policies Plan. For example, Policy NE5 includes areas of active peatland and areas of woodland, but not areas of degraded peat which could be restored, or areas of land that could be planted with trees in the future. Protecting existing habitats and green spaces is important, but if Northern Ireland is to achieve Nature Positive by 2030, new areas will have to be restored and created too. Adding to the borough's existing natural spaces and creating new linkages will be essential in helping create a climate resilient ecological network.

Sites of Local Nature Conservation Importance (SLNCIs)

8. We are concerned about the Council's decision to remove Sites of Local Nature Conservation Importance (SLNCIs) from its Local Development Plan. SLNCIs, historically identified in extant plans, provide mapped designations highlighting areas of local ecological importance, with the intention of protecting local biodiversity and natural features from inappropriate development. The Council has instead opted for a policy-based approach, arguing areas previously identified as SLNCIs will still be protected by the LDP's policies (including Policies NE1-5), as many SLNCIs overlap with other designations or contain other important natural heritage features.

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9. However, we do not believe this provides the same level of protection as direct designation. SLNCIs provide clearly mapped recognition of ecological value, a defined policy trigger in planning decisions, certainty for planners, developers and communities, and stronger defensibility at appeal. General policies require interpretation and often depend on additional surveys being carried out. In the context of the ongoing nature crisis, there is a strong precautionary argument for retaining clear, mapped recognition of locally important ecological sites.
10. While the Council notes that 46 of 47 SLNCIs are already identified on the NIEA Natura Mapviewer as containing priority habitat (and therefore protected by Policy NE5), priority habitat mapping is often broad-scale and SLNCIs often existed precisely because local knowledge identified ecological value not fully reflected in national mapping. As Technical Supplement 9: subsection 16.3 states, the priority habitat inventory isn't complete, so desk-based identification might be unable to replace site-specific designation informed by field surveys.
11. Removing SLNCIs limits opportunities to identify and protect additional areas that are locally important for nature but do not have priority habitat mapped. In contrast, other councils are actively consulting on expanding their network of SLNCIs – something that has the potential to contribute to the development of a nature recovery network across Northern Ireland and could be part of the borough's contribution towards the 30 x 30 targets as OECM sites (Other Effective Conservation Measure).
12. Further, the Council has taken the view that because the survey data informing SLNCIs is approximately 25 years old, it cannot be relied on to support a designation. However, outdated surveys do not automatically mean sites have lost ecological value. In many cases, habitats mature and increase in biodiversity significance over time. The logical response to outdated data would be to update the surveys, review boundaries at Local Policies Plan stage, and apply a precautionary approach until new evidence is available. The precautionary principle suggests protection should remain until proven unnecessary — not removed due to incomplete data.
13. Finally, neighbouring authorities (including Belfast City Council, Lisburn & Castlereagh City Council, and Newry, Mourne and Down District Council) are retaining SLNCIs in their LDPs – suggesting they see the value in the designation. While different approaches across councils do not prevent others from reviewing cross-boundary sites independently, inconsistent treatment risks fragmenting habitat networks and weakening wildlife corridors, creating uneven planning standards, and confusing developers and communities. Regional consistency would arguably strengthen environmental protection and policy clarity, working more efficiently toward the shared goal of biodiversity conservation.

Climate Change and Coastal Change

14. We welcome the Council's focus on adaptation and mitigation throughout the DPS, including in the vision, for a vibrant and connected place that has responded to the need for adaptation and mitigation in relation to climate change. The DPS's Climate

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Change Adaptation and Mitigation Strategy clearly sets out the vulnerabilities of the borough to climate change and recognises the need to “fundamentally change the way we plan, manage, and operate” to become more sustainable, with adaptation and mitigation central “in building community resilience and protecting biodiversity and the historic environment”. Strategic Policy CC1 highlights the interconnectedness of the nature and climate crisis and the need to increase local environmental resilience through the DPS’s policies on green and blue infrastructure, nature-based solutions for climate adaptation and mitigation, re-use of historic buildings, the use of sustainable drainage systems, and management of flood risk and coastal change.

15. The DPS’s Coastal Management Strategy recognises the impact of coastal change in the borough, now and in the future, with policies designed to limit “all but essential development in sensitive coastal locations, particularly those that are susceptible to coastal flooding, erosion and land instability. Where possible, nature-based solutions should be utilised to mitigate these impacts.”
16. We particularly welcome the intention to protect the undeveloped coast from inappropriate, excessive or obtrusive development. The creation of the Ards and North Down Undeveloped Coastal Zone (AND UCZ) is a positive step. The protections offered through Policy CO1 means that permission will only be granted for development proposals on sites within the AND UCZ under certain limited conditions. If implemented effectively, this should help mitigate the effects of ‘coastal squeeze’ and limit development in areas where climate change will be most intensely felt – improving resilience of the borough’s coastal communities, landscapes and natural heritage.
17. However, the Council must ensure that the implementation of the policy is consistent and robustly applied, so that exceptions do not become commonplace. In addition, while appropriate mitigations and compensatory measures are required in such exceptions, the policy wording should be made clearer to ensure a net positive benefit for biodiversity.
18. The AND UCZ includes all coastal areas outside of settlement limits. The outer (seaward) edge of the AND UCZ corresponds with the Low Water Mark, meaning that it extends beyond the ‘developable’ coast of the borough and includes some intertidal areas such as mudflats, beaches and other coastal features.
19. Section 8.8 of Coastal Management – Technical Supplement 11 describes the methodology used to define the AND UCZ. It describes the 5m contour being used as a starting point to define the boundary of the AND UCZ on land – to ensure all appropriate coastal features were captured. However, when viewing the AND UCZ on the draft Plan Strategy Mapviewer, the boundary tends to align with the positioning of coastal roads rather than the contour itself.
20. It is important to consider where the future coast is likely to be, to avoid maladaptation and building houses, planning infrastructure or other developments in locations of potential future coastal erosion and flooding risk, which would cost the

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Council more – economically and socially – in the future. The 10m contour was discussed and discounted in the document because it would be “unduly restrictive”, ruling out too much land. However, it is worth noting much of that land would already be of flooding and erosional risk.

21. The NI Flood Maps provide some information on coastal flooding using the Climate T200 layers, which represents a “Medium Probability” flood hazard. There is a 0.5% chance that a flood of this magnitude or greater will occur in any given year (which includes significant areas towards the southern end of the Peninsula). The NI Coastal Observatory provides further information through the Topographical LIDAR, and the Historical Shoreline Analysis to provide further evidence of past changes in the shoreline. The LIDAR data will firm up the actual current and changing contours of the land and the geology beneath, which impacts on the rates of erosion.
22. The ‘[State of the UK Climate](#)’ report (July 2025) stated that Tide gauge records since the 1900s provide observational evidence that sea level rise around the UK is accelerating, with two-thirds of the observed sea level rise over that period happening in just over the last three decades. For the first time, this report highlights the UK sea level is rising faster than the global average. Looking at 2024 specifically, the most extreme sea levels were associated with Storm Kathleen in early April, which coincided with spring tides and was influenced by high background mean sea levels.
23. It is also important to consider how the policy will interact with Marine Strategies including the Marine (Draft) Plan; Marine Licencing; Offshore Renewables; the Blue Carbon Action Plan, Marine Protected Area Strategy and others.
24. Policy CO3 on coastal change is also a positive inclusion in the DPS. Restricting development in known areas of coastal erosion and land instability is the sensible approach. Adopting a precautionary approach, particularly in areas where erosion and land instability is likely but the extent of the impact is not fully known, with a presumption against development, is welcome.
25. However, we are concerned by the lack of detail in the DPS regarding how these areas will be identified. We are pleased that Ards and North Down Borough Council are an active member on the NI Coastal Forum and we agree that investment continues to be needed to improve data on coastal change in Northern Ireland. However, the work of the NI Coastal Forum over the past few years, including the launch of the NI Coastal Observatory, means that decision makers should be in much better position to manage coastal change. The Council should ensure the latest data and evidence hosted by the NI Coastal Observatory is being used in these decisions.
26. Northern Ireland’s Environmental Improvement Plan also includes the objective that *“By 2030: Nature-based solutions to coastal erosion, where appropriate, will be implemented in collaboration with the Coastal Forum and new policy development.”* The Council should consider how this will connect into any works within settlement boundaries, around the coast not included in the AND UCZ.

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Sustainable Drainage Systems (SuDS)

27. Policy FLD6 requires a sustainable drainage solution for any development that triggers the requirement for a Drainage Assessment, except where the site is fundamentally unsuitable for SuDS. We see this as a positive step to help mitigate flood risk and water pollution in a changing climate. Ensuring that arrangements are put in place for the management and maintenance of the SuDS is crucial, so it is encouraging to see this also included in the policy. The use of green infrastructure solutions for flood risk management can also have co-benefits for local biodiversity.
28. For clarity, and to avoid any misinterpretation, we believe the wording at the start of Policy FLD6 should be changed to read “Sustainable Drainage Systems (SuDS)...” rather than “A sustainable drainage solution...”.

Historic Environment

29. The Historic Environment Strategy in the DPS recognises the contribution that the historic environment makes to the sense of place and character of the Borough. Our historic environment provides a unique connection to the past, which often forms a core part of identity and sense of belonging. We welcome the Council’s intention to protect and conserve the historic environment of the Borough through the DPS – including policies to protect historic parks, gardens and demesnes, and listed buildings.
30. The new proposed Nendrum Area of Significant Archaeological Interest (ASAI) recognises the unique island and coastal landscape around the Nendrum heritage site, and through Policies HE1 and HE2, adds an important layer of protection against inappropriate development – not only to the site itself, but also to its setting.
31. This inclusion of ‘setting’ within Policies HE1-3, provides an important level of protection beyond the boundaries of heritage sites, and should take into consideration the critical views to and from sites, as well as the public approaches to the site.

Tourism

32. The Sustainable Tourism Strategy recognises that opportunities for tourism development exist principally within urban areas where infrastructure and facilities are already in place.
33. It should also be noted that huge opportunities exist in Northern Ireland for tourism founded on access to nature and outdoor recreation – and the DPS recognises the borough’s wealth of natural assets will continue to attract visitors. We are fully supportive of this. However, increased demand for access, often to our most sensitive landscapes, brings with it responsibilities to provide careful management and take climate impacts into account.

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34. We welcome recognition within the Sustainable Tourism Strategy that tourism development is not appropriate where it would have a negative impact on the character of a townscape, or the natural or historic environment. The DPS identifies a sustainable tourism hierarchy and associated policies to balance visitor demands with protection of the environment and ensure new development is focused in sustainable locations, defining priority areas (where tourism development is expected), sensitive areas (where tourism development is controlled) and protected areas (where tourism development is prevented, except in exceptional circumstances).
35. Policy TSM2 recognises the need for the development of certain appropriate tourism amenities in the countryside, provided they comply with the other policies, including on the protection of the natural and historic environment.
36. Policy TSM4 sets out the exceptional circumstances where planning permission would be granted for major tourism development in the countryside. While we accept that the exceptional circumstances are intended to set a high bar, the listed exceptions could, in practice, lead to the natural environment being deprioritised in decision-making, in favour of economic considerations. We would like to see more detail included in the DPS setting out how such proposals would be considered, in line with a precautionary approach, and taking into account the views of local communities and stakeholders.
37. Finally, Policy TSM7 prevents development that would have “an adverse impact on a tourism asset such as to significantly compromise its tourism value.” Covering “all tourism assets”, this includes features within both the natural and built environment – including those subject to other protections and those that are not – and has no listed exceptions. We see this as a positive step, which could provide important protection for the Borough’s special landscapes and natural heritage that tourism relies on. However, its strength will depend on how much weight the policy will be given, and how tourism assets are defined, in practice.

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