

KILLINCHY RURAL PRESERVATION GROUP

COMMENTS ON THE DRAFT PLAN STRATEGY FOR THE LOCAL DEVELOPMENT PLAN [LDP] 2032

1. The Killinchy Rural Preservation Group (KRPBG) is interested in the area around Balloo, Killinchy, Whiterock, and Ardmillan. The Group made submissions to those responsible for the preparation of the Ards and Down Area Plan 2015 and also commented on the Ards and North Down Borough Council's Local Development Plan Preferred Options Paper: March 2019 (POP). We refer to those comments dated 6 August 2019.
2. On 14 December 2025 we made representations on the Draft Plan Strategy for the Local Development Plan (LDP) 2032. However, following the Council's decision to re-run the public consultation, and the notice on its website to the effect that our previous representations of 14 December 2025 will not be considered, we hereby make the following representations on the Draft Plan Strategy for the Local Development Plan (LDP) 2032.
3. The area in which we are interested lies within the Strangford and Lecale Area of Outstanding Natural Beauty. Strangford Lough is a designated Ramsar area, a Special Protection Area and a Special Area of Conservation. Ongoing management and protection of these areas will require a sensitive and appropriate approach from the Council.

GROWTH STRATEGY

Settlement Hierarchy and Strategic Housing Allocation across Settlements

4. We refer to paragraphs 3 – 11 of our comments on POP.
5. On the basis that Whiterock did not have any service provision – no shop, no post office, no community hall, no public transport etc. we argued that it should be re-classified from being a village to a small settlement.
6. KRPBG welcomes that at **SGS 2: Settlement Hierarchy**¹, Whiterock has indeed been reclassified as a small settlement.
7. We also note **SGS 5: Strategic Housing Allocation across settlements**² that the total potential housing supply for all the villages is 1766 and for all the small settlements is 236. At footnote 8 of the same page³ it is stated that this is an indicative strategic allocation. More detailed analysis will take place at Local Policies Plan stage including a review of existing zonings, and an “up-to-date assessment of infrastructure capacity, in particular relating to wastewater treatment works upgrades and network capacity. This may require some adjustments be made to the allocation”.

COUNTRYSIDE STRATEGY

¹ LDP page 64

² LDP page 77

³ LDP page 77

Rural Landscape Wedges

8. As stated at paragraphs 10 and 69 of our comments on POP, ribbon development between Balloo, Killinchy, Whiterock and Ardmillan should be prohibited. It is important to minimise intensification of development on the quiet winding country roads and to retain the character and identity of these settlements as separate identifiable communities. This forms part of the attractiveness of our area.
9. KRPG therefore welcomes policy **CS2 – Rural Landscape Wedges**⁴ and request that the areas between the above settlements be designated as Rural Landscape Wedges at LPP stage.

Areas of High Scenic Value

10. At paragraph 68 of our comments on POP, KRPG argued that parts of our area should be designated an Area of High Scenic Value -

to protect the stunning view from the Killinakin Road, across the drumlins and Strangford Lough,

and

for Whiterock, to protect the view of Strangford Lough that attracts so many visitors (tourists, cyclists, photographers etc.). We added that it would also contribute to protecting the shoreline of the Lough from the effects of professional shell fishermen.

11. KRPG therefore welcomes **Policy CS4 – Areas of High Scenic Value**⁵ and request that these areas be designated Areas of High Scenic Value at LPP stage.
12. At paragraph 38 below, we argue that the Undeveloped Coastal Zone should extend from Strangford Lough to the Killinakin and Ballymorran Roads. We also note that the Strangford and Lecale AONB extends from the Lough to the A22 road. Both the Undeveloped Coastal Zone and the AONB would then encompass the Areas of High Scenic Value requested in paragraphs 10 and 11 above.
13. In addition to the visitors mentioned in para 10 above, it is also important to emphasise the attractive approach to Whiterock for sailors and cruising yachts visiting Strangford Lough. These are often high net worth individuals who will be contributing to the local economy. That attractive approach would be protected by the extension of the Undeveloped Coastal Zone, the AONB and the Areas of High Scenic Value referred to above.
14. At paragraph 22 below we support Policy OS9 – Floodlighting of Sports and Outdoor Recreational Facilities⁶. Policy OS9 should be extended to apply to AoHSVs throughout the Borough.

The Setting of Settlements

⁴ LDP page 85

⁵ LDP page 87

⁶ LDP page 205

15. As stated at paragraph 8 above, ribbon development between Balloo, Killinchy, Whiterock and Ardmillan should be prohibited. We consider **Policy CS7 - The Setting of Settlements**⁷ to be helpful in this regard.

HOUSING IN THE COUNTRYSIDE

Dwellings in Existing Clusters and Ribbon Development

16. As already stated at paragraphs 8 and 15 above, ribbon development between Balloo, Killinchy, Whiterock and Ardmillan should be prohibited. **Policies HOU9 – New Dwellings in Existing Clusters**⁸ and **HOU15 – Ribbon Development**⁹ will be helpful to prevent such expansion.

OPEN SPACE, SPORT AND OUTDOOR RECREATION

17. In our comments on POP, at paragraph 42 we stated that in our area there were 2 obvious open spaces: - the area behind Killinchy Community Hall and Strangford Lough.
18. The area behind Killinchy Community Hall has now been developed.
19. At paragraph 44 of our comments on POP, we argued that in relation to Strangford Lough there were numerous boat clubs around the lough. In our area there are 2 - Strangford Lough Yacht Club and Down Cruising Club. Any perceived lack of access to the Lough at Whiterock Bay / Ballydorn should be addressed through these facilities. They are within a mile of each other, already extant, have arrangements for car parking, launching and showering etc. Strangford Lough Yacht Club is increasingly widening its user base and is opening up its facilities to non-sailing use; e.g. swimmers. There are numerous yacht and boat clubs in the Lough and recreational use should be directed around these existing facilities to protect the much threatened flora and fauna much of which is at tipping point, rather than intensification elsewhere around the protected Undeveloped Coastal Zone. We request that intensification of development and use is prohibited except around these clubs. See also para 38 below.
20. KRPG is passionately of the view that Strangford Lough must be protected. We are supported in that view by the numerous designations that have been applied to the Lough.
21. We consider that Strangford Lough falls within the definition of “Open Space” at **paragraph 8.18**¹⁰ of the LDP. The Lough is such a significant part of the Borough it should be specifically referred to in the definition of “Open Space” so that it is clear that it receives the protection of being an “Open Space”.
22. Accordingly, we support the following policies in the LDP in the hope that they will protect the Lough and its surroundings: -

OS1 – Protection of Open Space¹¹

⁷ LDP page 98

⁸ LDP page 159

⁹ LDP page 170

¹⁰ LDP page 184

¹¹ LDP page 184

- OS5 – Outdoor Recreation in the Countryside¹²**
- OS6 – Intensive Sports Facilities¹³**
- OS7 – Noise Generating Sports and Outdoor Recreational Activities¹⁴**
- OS8 – Development of Facilities Ancillary to Water Sports¹⁵**
- OS9 – Floodlighting of Sports and Outdoor Recreational Facilities¹⁶**

SUSTAINABLE TOURISM

23. At paragraph 80 of our comments on POP we commented that KRPG understands the economic drivers and benefits of tourism but noted that parts of our area are particularly sensitive and that therefore we would not wish to see it compromised by tourist developments.

24. KRPG hopes that the following included in the LDP will help achieve that objective: -

The definitions of **Priority Areas**, **Sensitive Areas** and **Protected Areas¹⁷** and **Table 9, Tourism Hierarchy Areas¹⁸** signifying that;

only Balloo, Killinchy, Whiterock and Ardmillan would be “Priority Areas” within our area of interest,

our complete area of interest lies within the “Sensitive Area” of Strangford Lough and Lecale AONB, and

that part of our area that lies within the Ards and North Down Undeveloped Coastal Zone will be a “Protected Area”.

Policy TSM1 – Tourism Development in Settlements¹⁹

Policy TSM2 – Tourist Amenities in the Countryside²⁰

Policy TSM3 – Hotels, Guest Houses and Tourist Hostels in the Countryside²¹

Policy TSM4 – Major Tourism Development in the Countryside – Exceptional Circumstances²²

Policy TSM5 – Self-Catering Accommodation in the Countryside²³

¹² LDP page 196

¹³ LDP page 200

¹⁴ LDP page 201

¹⁵ LDP page 204

¹⁶ LDP page 205

¹⁷ LDP page 261

¹⁸ LDP page 262

¹⁹ LDP page 263

²⁰ LDP page 264

²¹ LDP pages 266 - 269

²² LDP page 271

²³ LDP page 273

**Policy TSM6 – New and Extended Holiday Parks and Glamping
Accommodation²⁴**

Policy TSM7 – Safeguarding of Tourism Assets²⁵

ENVIRONMENT

Natural Environment

Policy NE6 – Areas of Outstanding Natural Beauty [AONB]²⁶

25. At Key Issue 25 of POP, Areas of Outstanding Natural Beauty [AONBs] two options were given: -

Option 25a (POP’s Preferred Option): Bring forward bespoke policies to guide future development and protection of Strangford and Lecale Area of Outstanding Natural Beauty.

Option 25b: Retain the current policy approach with respect to Strangford and Lecale AONB.

26. At paragraph 72 of our comments on POP, we agreed that Option 25a was preferable. In our view the current approach to our area of the AONB had been totally unsatisfactory.

27. At paragraphs 74 and 75 of our comments on POP, KRPG argued

“Our area is characterised by the beauty of Strangford Lough, the countryside around it and the small rural roads that weave through the countryside. A very large food processing factory, with all its associated lights and traffic (numerous very large HGVs, employees and customers coming and going), housing being allowed on the skyline and 2½ storey housing being permitted, are some of examples of development that should not have been permitted within our area of the AONB.

The LDP should bring forward bespoke policies to protect the character of the area and ensure that development in the AONB is more sympathetic to, and in keeping with, the area, and should be of an appropriate scale and design.”

28. The current policy in relation to AONBs is PPS2 – Policy NH6 which states: -

“Planning permission for new development within an Area of Outstanding Natural Beauty will only be granted where it is of an appropriate design, size and scale for the locality and all the following criteria are met:

- a) the siting and scale of the proposal is sympathetic to the special character of the Area of Outstanding Natural Beauty in general and of the particular locality;
- and

²⁴ LDP page 276 - 277

²⁵ LDP page 279

²⁶ LDP page 311

b) it respects or conserves features (including buildings and other man-made features) of importance to the character, appearance or heritage of the landscape; and

c) the proposal respects:

- local architectural styles and patterns;
- traditional boundary details, by retaining features such as hedges, walls, trees and gates; and
- local materials, design and colour.”

29. That should be compared with **Policy NE6 – Areas of Outstanding Natural Beauty [AONB]**²⁷ in the LDP –

“Planning permission for new development within Strangford and Lecale Area of Outstanding Natural Beauty (AONB) will only be granted where all the following criteria are met:

(a) The siting and scale of the proposal is sympathetic to the distinctive special character of the area and the quality of the landscape, heritage, and wildlife;

(b) It respects or conserves features (including buildings and other man-made features) of importance to the character, appearance, or heritage of the landscape, including the:

- (i) Local architectural style and pattern;
- (ii) Traditional boundary details, by retaining features such as hedges, walls, trees, and gates;
- (iii) Local materials, design, and colour; and
- (iv) Protection of the public view of key features, such as ridge lines and coastal headlines within the AONB.

Proposals located outside the AONB but which have a visual link, must have regard to the sensitivity of the setting and the visual relationship with Strangford and Lecale AONB.

Proposals must also comply with General Principles Policy GP 01 and all other relevant policy provisions of the LDP.”

²⁷ LDP page 311

30. The AONB in our area of concern extends from Strangford Lough to the A22 Road. Referring to the examples cited at paragraph 27 above, we consider that the protection an AONB should offer has failed our area.
31. Whilst we recognise that **Policy NE6** of the LDP is a slight improvement on, it is not noticeably different to, PPS2 – Policy NH6. It is not the bespoke policy to guide future development and protection of Strangford and Lecale Area of Outstanding Natural Beauty which was the preferred Option 25a of POP. It is more analogous to Option 25b of POP (Retain the current policy approach with respect to Strangford and Lecale AONB) which was neither the preferred option of POP, nor takes account of the representations that we made at paragraphs 72 – 75 on POP.
32. We therefore challenge **Policy NE6** to be unsound – Procedural Test P2.

Historic Environment

33. At paragraph 62 of KRPG’s comments on POP, we agreed with Option 22a of POP – “Bring forward specific measures to safeguard against the potential loss of non-designated heritage assets.”. We stated that our area and its surroundings are imbued with significant history – Nendrum Monastic Site, and Sketrick Castle. The Post Office, the Old Bank and Balloo House in Balloo, the Killinchy Presbyterian Church on the Craigarusky Road (which is one of the oldest in Ireland) and Tullynakill Church should all be recognised in a Local Heritage List. They are historic and locally important due to their age, and social / cultural significance.
34. We are also aware that within our area there are, or likely to be, other buildings (e.g. the B1 listed Non-Subscribing Presbyterian Church at Balloo), historical sites (e.g. Ballydorn Quay) and archaeological remains which require protection and request these sites be listed in a Local Heritage List.
35. Accordingly, we support the following in the LDP; -

Designation NM1²⁸ – Nendrum Area of Significant Archaeological Interest [ASA1]

Policy HE1²⁹ – Statements of Significance [SOS]

Policy HE2³⁰ – The Preservation of Archaeological Remains of Regional Importance and their Settings

Policy HE3³¹ – The Preservation of Archaeological Remains of Local Importance and their Settings

Policy HE4³² – Archaeological Assessment and Evaluation

²⁸ LDP page 317

²⁹ LDP page 319

³⁰ LDP page 321

³¹ LDP page 322

³² LDP page 323

Policy HE5³³ – Archaeological Mitigation

Policy HE7³⁴ – Change of Use or Extension/Alteration or Conversion of a Listed Building

Policy HE9³⁵ – The Demolition or Partial Demolition of a Listed Building

Policy HE10³⁶ – Development Affecting the Setting of a Listed Building

Policy HE12³⁷ – Areas of Townscape/Village Character

36. Balloo has buildings of significant interest as listed in paragraph 33 above that make a positive contribution to the character, identity and touristic value of the settlement and as such are worthy of protection through the establishment of a new Area of Townscape/Village Character. KRPG again request that Balloo is designated an ATC/AVC and that these buildings should be included in a list of heritage assets (see paragraph 33 above). Balloo is the only truly charming characterful historic settlement in the area for traditional authentic shopping and eating experiences. It needs extra protection. KRPG requests a full study is commissioned to look at the positive impact Balloo makes to the area and risks to the character of the settlement without ATC/AVC protection.

Coastal Management

37. In relation to our area of interest, we note and agree with: -

The **Coastal Management Strategy³⁸** of the LDP

Policy CO3 – Coastal Change³⁹

38. However, we would like to comment on the following: -

Designation UCZ 1 Ards and North Down Undeveloped Coastal Zone [AND UCZ]⁴⁰ and Map 1d: Ards and North Down Undeveloped Coastal Zone of the LDP.

Given the failure of the AONB referred to at paragraphs 30 – 32 above in protecting our area, we see this designation as a very positive new designation that would ensure adequate protection of the area. In this regard we furthermore request that the Undeveloped Coastal Zone should be extended from Strangford Lough to the Killinakin and Ballymorran Roads. It is very important to emphasise the view of Whiterock and its surroundings from the Lough and the attractive approach to Whiterock for sailors and cruising yachts visiting Strangford Lough. That view would be protected by the extension of the

³³ LDP page 324

³⁴ LDP page 328

³⁵ LDP page 331

³⁶ LDP page 333

³⁷ LDP pages 340 - 341

³⁸ LDP page 349

³⁹ LDP page 356

⁴⁰ LDP page 351

Undeveloped Coastal Zone, the AONB and the Areas of High Scenic Value referred to above at paragraph 11 above. It would also protect the skyline from development around Whiterock (e.g. on the Killinakin Road).

Policy CO1 – The Undeveloped Coast⁴¹

The shoreline must be protected. Any intensification of activity should be carefully considered regarding its effect on wildlife and on the visual aspect from the Lough. With Northern Ireland moving to a nature recovery strategy we request inclusion and observance of The State of Nature report 2023 in the LDP. This will consolidate in the LDP the need to tackle serious biodiversity loss in NI, as it is well recognised that habitat loss caused by development is the biggest threat to biodiversity. See EU Biodiversity Strategy 2030, Environmental Improvement Plan for NI-September 2024, The Biodiversity strategy for NI to 2030, UK Marine Policy Statement (MPS) 2011, Draft Marine Plan for NI 2018.

Policy CO2 – Urban Waterfronts in the Developed Coast⁴²

We note that at **paragraphs 16.25⁴³ and 16.26⁴⁴** Urban Waterfronts [UWs] other than Bangor, will be designated within other coastal settlements at LPP stage. Whiterock is the only coastal settlement within our area of concern. Activity at Whiterock is already at a high level, the shoreline and wildlife are already suffering from degradation and decline. The eco system of the shoreline, flora and fauna should be further protected from intensification of activity in line with NI Executive policy on protecting biodiversity particularly with regards the threat to birdlife. There are a number of birds on the red list of threatened species that reside in Whiterock, Ballydorn, Ardmillan and Ballymorran Bays (see the documents referred to above). There is also a lack of supporting infrastructure and suitable space. For these reasons, we do not consider it appropriate to designate Whiterock as an Urban Waterfront.

INFRASTRUCTURE

Renewable Energy

39. At paragraphs 27 to 29 of KRPG's comments on POP, we preferred Option 4b (POP'S preferred option): - Consider all renewable energy proposals coming forward on a case by case basis whilst adopting the 'cautious approach' within designated landscapes as endorsed by the SPPS.
40. We agreed with the Council's approach in relation to wind turbines in sensitive landscapes. The case by case consideration must take into account the sensitivity of our area and that it lies within the AONB.

⁴¹ LDP page 352

⁴² LDP page 354

⁴³ LDP page 355

⁴⁴ LDP page 356

41. We have carefully considered **Policy RE1 – Renewable and Low/Zero Carbon Energy Development**⁴⁵. We note the various conditions that have been included in the policy. However, given the sensitivity of the area about which we are concerned, and in line with our representations at paragraph 38 above to extend the Undeveloped Coastal Zone around Whiterock, thus extending the protected area, we do not consider that planning permission should ever be granted for a wind turbine(s) within the revised protected area.

Waste Management

Policy WM1 – Environmental Impact of a Waste Management Facility⁴⁶ and **Policy WM 2 – Waste Collection and Treatment Facilities**⁴⁷

42. The only Waste Management that is required and that should be permitted in our area is the management of wastewater. We note **policies WM1 and WM2** above. They should be expanded to include Waste Water Pumping Stations.

Non-Mains Wastewater Infrastructure

43. There is presently insufficient capacity within NIW’s wastewater treatment facilities in our area to serve some new developments. Accordingly, planning permissions may be granted subject to conditions relating to some means of on-site wastewater treatment – (e.g. planning applications LA06/2022/0628/F and LA06/2023/1339/F).

44. Accordingly, we note and support Policy **NMW1 - Non-Mains Wastewater Infrastructure**⁴⁸. **Paragraph 25.10**⁴⁹ of the LDP states “It is desirable for new development to connect to mains services wherever possible” and **paragraphs 25.11 – 25.18**⁵⁰ describe our concerns with on-site wastewater treatment and in particular the possibility of polluting Strangford Lough.

Signed John Andrews

Chairman Killinchy Rural Preservation Group

Date 3 March 2026

Contact mobile [REDACTED]

⁴⁵ LDP pages 398 - 399

⁴⁶ LDP page 453

⁴⁷ LDP pages 455 - 456

⁴⁸ LDP page 466

⁴⁹ LDP page 466

⁵⁰ LDP pages 467 - 468