



Department for the
Economy
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An Roinn
Geilleagair

GSNI Geological
Survey of
Northern
Ireland
www.bgs.ac.uk/gsni

Consultation on the Draft Plan Strategy for the Ards and North Down Borough Council our Local Development Plan (LDP)

Response from the Geological Survey of Northern Ireland

March 2026

Policy GP1 e) Safety and the Safeguarding of Human Health and Wellbeing

- **‘the development site is not located in an area known to be at risk from coastal erosion or land instability or will not exacerbate such risks elsewhere.’**

5.42 - ‘the Council will also use its planning powers to ensure that new development is not located in areas of risk such as flood plains, or areas liable to land instability and subsidence.’

GSNI support the Council’s consideration of development sites at risk for new developments within areas susceptible to coastal erosion, flooding, instability and subsidence. GSNI would encourage the requirement of appropriate assessments to be carried out for developments within areas at of instability, erosion and subsidence as part of planning applications to determine the suitability and sustainability of development in such areas.

Map 6: Ards and North Down Geodiversity

The maps shown is not a standard geological map. Some of the elements displayed are misleading including (but not limited to) the use of the term ‘sandstone’ to describe the geology that covers the majority of the Council area. This is incorrect as most of the Council area is covered by ‘metasedimentary’ rocks. GSNI would encourage the Council to replace this map with an appropriate bedrock and superficial geology map produced in consultation with GSNI.

Policy MIN 1 Environmental Impact

“Planning permission will be granted for mineral exploration and working only where:”

There needs to be a clear distinction between responsibility for mineral management that is covered by the Local Development Plan and that which is covered by the Mineral Development Act that applies to minerals vested with the Department for the Economy.

“Permission for the extraction of peat for sale will only be granted in exceptional circumstances where it is demonstrated that peat is already degraded and not reasonably capable of restoration and where peat extraction is linked to a management plan which will deliver improved peatlands over a longer term.”

A mineral in geological terms is defined as ‘a naturally occurring crystalline inorganic solid substance with a defined chemical composition which may vary within known limits.’ Peat is

not strictly a mineral because it is not a crystalline solid, but GSNI acknowledges that it is often included with minerals in planning policy documents.

Policy MIN3 Valuable Minerals

13.34 – ‘Extraction of valuable minerals within the Borough under this policy will require detailed justification on the value of the resource which may include data from the Tellus survey from the Geological Survey Northern Ireland (GSNI) and the Minerals Resource Map for Ards and North Down.’

The correct expansion of GSNI is Geological Survey of Northern Ireland.

Policy MIN 4 Mineral Safeguarding Areas (MSAs)

“Planning permission will not be granted where surface development would prejudice the future exploitation of valuable mineral reserves.”

GSNI would encourage the use of the term ‘mineral resources’ rather than ‘mineral reserve’, in this section and elsewhere in the document.

A mineral resource is considered a concentration of mineral (or rock in the case of aggregate material) where there is reasonable potential for the material to be extracted economically. A mineral reserve is a portion of the resource where it has been demonstrated that economic extraction is possible. The transition from resource to reserve is relatively straightforward where hard rock material (like sandstone or sand and gravel) is concerned. However, there is a much greater lead time for high value minerals where the process of getting a mineral resource (which has been identified through mineral exploration techniques licensed under the current DfE legislation) to a mineral reserve can take many years. The global average for an exploration discovery to become a mine is approximately 18 years.

Making a clear distinction between a resource and a reserve removes any ambiguity and could potentially reduce procedural delays in the event of a challenge to any planning decision.

Policy MIN 7 Restoration

13.46 Restoration after the cessation of mineral development has the potential to enhance geodiversity where geological features can be studied, where appropriate and biodiversity enhanced through the choice of after use.

GSNI welcomes the inclusion of geodiversity enhancement within MIN 7 as part of mineral development restoration.

Coastal Management

16.13 - ‘The DFI 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.’

This section is referring to the Coastal Forum Working Group (CFWG) which was established in 2016 as opposed to the Coastal Forum that was established earlier by the DAERA and DfI Ministers. GSNI would encourage the updating of the terminology to acknowledge the outputs of the CFWG and the role that the Council has within that.

Policy CO3 Coastal Change

'There is a presumption against development in known areas of land instability and erosion in coastal locations.

In areas of known land instability and coastal erosion, new development or the intensification of existing development or land uses will not be permitted...

In cases where statutory consultees advise that erosion and land instability is likely, but the extent of the impact is not yet fully known, then a precautionary approach will be adopted, and planning permission will be refused'

The coastal management strategy promotes safeguarding public risk due to the threat of coastal erosion, inundation, instability and subsidence. The Draft Plan Strategy acknowledges the many data gaps in determining these areas. GSNI support the inclusion of adopting new strategies and best practice guidance as it becomes available through the CFWG as outlined within the plan.

Policy CU 1 Contaminated or Unstable Land

GSNI fully support policy CU1 in promoting safe and sustainable development in areas of potential land instability through the inclusion of requirements for adequate assessments and advice from appropriate statutory bodies.