

Representation to the Ards & North Down Borough Council Local Development Plan (LDP) 2032



March 2026

From: Sandycove Holiday Homes Ltd, a family business that owns and operates five caravan holiday parks on the Ards Peninsula and the Island of Ireland's only National Caravan Council-approved caravan holiday home distributorship.

Re: Draft Plan Strategy (DPS) – response, evidence, and proposed amendments to strengthen sustainable tourism and the economy of the Ards Peninsula.

1 Executive summary

Sandycove Holiday Homes Ltd welcomes the DPS's intention to support sustainable recreation and tourism. However, the current draft of UCZ1 is unsound. The combined effect of UCZ1 and TSM 6 imposes disproportionate constraints on established holiday parks, preventing essential reinvestment, adaptation to climate change and long-term operational resilience.

As business owners, who both live and work in close proximity to the Outer Ards ASSI, the reinforcement of the 2002 Outer Ards ASSI designation by planning policy CO 1 gives considerable and significant concern.

We have witnessed the consequences of the Outer ASSI designation for over 23 years and can attest to the detrimental impact it, and its enforcement, has had on our business and the wider Outer Ards communities and economy. We therefore propose targeted amendments to: (i) exclude existing licenced caravan holiday parks from the UCZ (ii) adopt Newry, Mourne & Down's (NMD) good practice of a Sustainable Benefit Statement so that schemes evidence community and economic uplift; and (iii) align with the SPPS emphasis on supporting sustainable economic growth and tourism.

Further to these amendments, we have listed issues which should be addressed prior to further land designation.

- Commission a Borough-wide CZM baseline that classifies 'developed' vs 'undeveloped' coast and identifies development/adaptation pathways for established holiday parks, aligned with SMP2/SFRA evidence.
- Limit the UCZ to ASSI designated areas and clearly undeveloped stretches unless and until a robust social and economic impact study justifies wider coverage.
- Apply a 'developed coast' sub-designation (or CCMA-style tool) around established licensed holiday parks to enable managed adaptation (pitch reconfiguration, consolidated footprints, landscape betterment, nature-based drainage, EV/renewables) under TSM 6 quality and environmental safeguards.
- Map 'Developed Coast' pockets around established licensed holiday parks/harbours/marinas/car parks.
- Where a caravan holiday park's curtilage is long-established, exclude that curtilage from UCZ1 to allow quality-led renewal that delivers net environmental, economic and community betterment.

- Introduce an UCZ1 exception for development on land adjacent to the boundary of an existing licensed holiday park (pitch rationalization and improvement, amenity upgrades, accessibility, EV/renewables, drainage/nature-based solutions, landscape restructuring, boundary reparations, modest extensions away from shoreline) subject to landscape/biodiversity tests, and TSM 6 quality criteria.
- Add a short ‘Sustainable Benefit Statement’ (as in Newry, Mourne & Down practice) evidencing local economic, community and environmental gains proportionate to scale.
- Apply a ‘no net detriment / net betterment’ test: consolidated footprints, reduced visual mass, enhanced green infrastructure, and improved edge treatments facing the UCZ.
- Use concept frameworks or park-scale masterplans to coordinate planting, drainage, circulation, dark-sky lighting and coastal character improvements in sensitive locations.
- Embed NRW-style operational guidance for existing parks in at-risk locations (evacuation planning, resident/visitor safety protocols, flood communication and business continuity).
- Rezone the lands between Ganaway Holiday Park and the Ards North WWTW as a “Rural Economic Development Site” (ED6/WM2 hybrid) in the LDP Local Policies Plan, permitting low-impact commercial, waste recovery, and renewable energy uses directly linked to the local caravan tourism industry.
- Amend TSM6 to state “Where a pod, lodge, hut or other unit is constructed in accordance with BS 3632, EN 1647 or BS 8642:2024 and meets the statutory definition of a caravan under s.15 of the Caravans Act (NI) 2011, it will be treated as a caravan for the purposes of Policy TSM 6.”



Aerial view of Ballyferris Caravan Park – 6th May 1968

2 Who we are & why this matters locally

Sandycove Holiday Homes Ltd is a family-owned business which operates five caravan holiday parks on the Ards Peninsula. Sandycove® directly employs 18 full-time and 5 part-time people, ranging in age from 18 to 79, from the local towns and villages within the Ards and North Down Borough. As well as direct employment, Sandycove® also employs approximately 150 sub-contractors and service suppliers. Sandycove Holiday Homes Ltd office staff can boast over 200 years of experience working in the caravan industry with the four directors alone having amassed over 125 years of experience in the caravan industry between them. Managing Director, James Kennedy was elected to the position of National Chairman of the British Holiday and Home Parks Association (BH&HPA), now called the Holiday and Residential Parks Association (HARPA). This is the trade association that represents the United Kingdom's caravan holiday parks industry. He was the first person from Northern Ireland to hold that position and brought the National Conference to Belfast in 2012, the first time it had ever been held on the island of Ireland, and he continues to sit on its board and be elected to its management committee to the present day. He was also elected to be the inaugural Chair of the Camping and Caravanning Forum for Northern Ireland (CCFNI).

Another one of Sandycove®'s directors, John Kennedy is also an inaugural member of the CCFNI and has been elected to serve as its Chair. John is a current member and has served as Chair of the National Caravan Council's (NCC) Holiday Caravan Distributor Committee and has also been elected to sit on HARPA's national Holiday Park Executive Committee. Sandycove's Directors have also held positions on the public/private partnership Tourism Organisations, 'Kingdoms of Down' and 'Armagh and Down Regional Tourism Partnership'. John has also been a contributing member of the Ards Peninsula Coastal Erosion Group for the past 12 years and was a regular attendee and contributor to the Ards Council Tourism Forum initiative. The Kennedy family are committed to the United Kingdom's caravan industry and are strong advocates for both Northern Ireland and Ards Peninsula tourism.

Sandycove Holiday Homes Ltd's parks host many thousands of visitor trips and nights every year, supporting local shops, cafes, restaurants, trades, and seasonal events. Four of Sandycove's holiday parks are directly on the coast - Ballyferris holiday Park (450 Pitches), Sandycove Holiday Park (160 pitches), Sandend Holiday Park (112 Pitches) and Springvale Holiday Park (70 Pitches) with Ganaway Holiday Park (123 Pitches) despite being very slightly inland, remaining in proximity and vital for the operation of the business.

With annual pitch fees ranging from £2378 to £5551 across all five Sandycove Holiday Homes Ltd's parks, they continue to be the **sustainable** backbone of the Ards and North Down Borough's tourism economy, with two of the parks having been in existence on the Outer Ards Peninsula coastline for over 75 years. The largest photo on the cover of this document is from Ballyferris, taken on the 17th September 1950.

Caravan parks continue to be vital to Northern Ireland's tourism economy: the 2024 UKCCA report found £390.7m gross direct visitor expenditure, supporting 7,236 FTE jobs and £205.7m GVA for NI, with a further £154.1m annual spend on maintenance by touring and holiday-caravan owners.

Sandycove®'s caravan parks have witnessed the demise of the hotel supply throughout the Ards and North Down Area. They have helped to sustain the tourism economy in Donaghadee and Ballywalter, local towns that have seen the closure of **all** their hotels. Within Ards & North Down, hotel supply has remained comparatively thin, with considerably more hotels closing in the last 50 years than opening. This has meant holiday parks have provided the critical bedspace capacity that Borough otherwise lacks—particularly for families, value-for-money, pet-owning, touring, shoulder-season and repeat-visit markets.

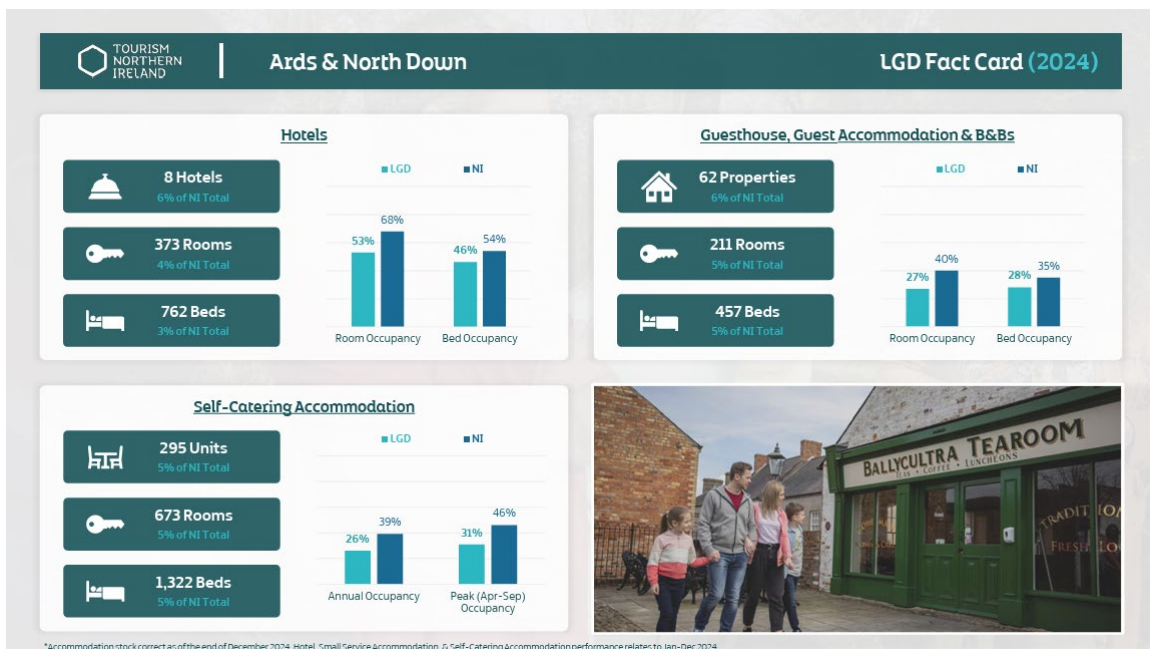
3 The development plan context

3.1 Exclusion of Caravan Park Data in Clause 7.8 of the Tourism Position Paper

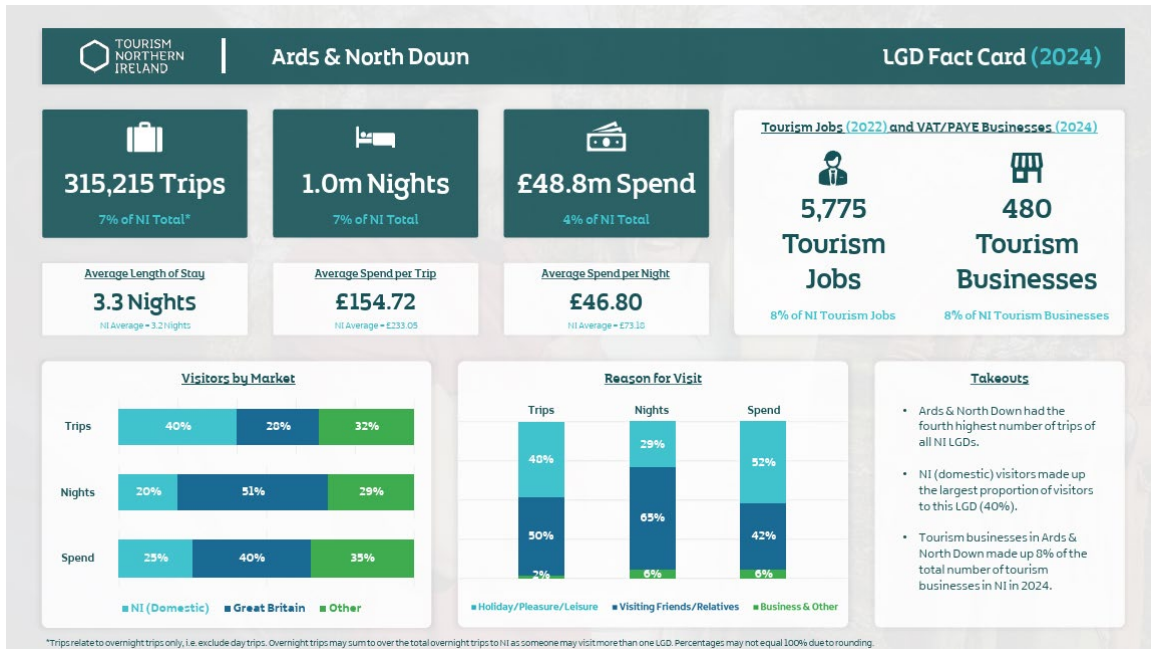
3.1.1 Overview

Clause 7.8 of the *Tourism Position Paper* (Ards & North Down Borough Council) explicitly states that **caravan park data was excluded** from the tourism evidence base used to inform the Local Development Plan (LDP). This deliberate omission represents a significant methodological and evidential gap in the LDP process, given the economic and spatial prominence of the caravan and holiday park sector within the Ards Peninsula and wider Borough. It should be noted that **Ards & North Down Borough Council are aware of the location, size, number of pitches and infrastructure requirements on each Caravan Site in the Borough because of their Licensing and Inspection regime.**

The deliberate exclusion of the caravan site data **directly compromises the soundness of the LDP** under the Department for Infrastructure’s (DfI) tests for *robust evidence, coherence with regional policy, and procedural fairness.*



Tourism NI’s local government district (LGD) ‘Fact Card’ demonstrates a similar deliberate exclusion of data relating to caravan holiday parks. These outputs are based on 2024 tourism performance statistics published by the Northern Ireland Statistics & Research Agency (NISRA).



The published 2024 LGD Infographic claims to provide the key metrics (trips, nights and spend) for the Ards & North Down LGD, while the 2024 LGD Summary Report provides more detail and insights for each area. Please note: NISRA did not publish official tourism performance statistics from 2020-2022.

3.1.2 Implications for LDP Soundness

Under the **soundness tests** set out by DfI and the Planning Appeals Commission, an LDP must be:

- **C1:** Coherent with the Regional Development Strategy (RDS 2035) and the SPPS;
- **C3:** Supported by a proportionate, relevant, and up-to-date *evidence base*;
- **P1:** Prepared following proper public consultation and engagement.

By omitting caravan park data, the Tourism Position Paper fails to meet these tests in several respects:

a. Incomplete Evidence Base (C3)

The exclusion results in a distorted representation of the Borough's tourism economy. Caravan parks are the dominant form of visitor accommodation in the Ards Peninsula, and their absence leaves policy makers without accurate data on:

- Visitor nights generated by static holiday and touring caravans;

- Visitor trips generated by caravan holiday parks;
- Revenue generated by static holiday and touring caravans;
- Employment, direct and indirect, supported by caravan park operations;
- Spatial distribution of tourism infrastructure (sewage, energy, communications and road impacts); and
- Land-use pressures from park redevelopment and renewal.

b. Lack of Coherence with Regional Policy (C1)

The **Strategic Planning Policy Statement (SPPS)** requires Councils to “facilitate sustainable tourism development in an environmentally sensitive manner” and to base policy on an understanding of existing tourism assets. Excluding caravan parks — the largest single component of the Borough’s tourism asset base — contradicts this principle and leads to *unsound spatial policies*, notably:

- **Policy TSM 6 (Touring and Static Caravan Parks)**, which lacks proportionate data to assess need or capacity;
- **Policy UCZ 1 (Undeveloped Coast)**, which places constraints on many caravan parks without an economic appraisal of impacts;
- **Tourism Opportunity Zones (TOZ)**, which were defined without the benefit of data on existing caravan park clusters.

c. Procedural Soundness (P1)

The deliberate exclusion of key sectoral data undermines the transparency of the evidence-gathering process, particularly given that caravan park operators (such as Sandycove Holiday Homes Ltd.) were not afforded an opportunity to verify or supplement the dataset prior to policy formulation.

3.1.3 Comparative Benchmarking

Other UK local authorities with significant coastal tourism sectors have **explicitly included caravan park data** in their tourism evidence base and policy assessments:

- **East Lindsey District Council (Lincolnshire)** – *Tourism Strategy 2022–2027* includes detailed caravan occupancy, pitch numbers, and replacement demand to inform coastal policy and waste management.
- **Ceredigion County Council (Wales)** – conducted a *Caravan and Camping Evidence Study* (2019) to assess lifecycle, economic impact, and environmental integration.

- **North Norfolk District Council** – includes caravan park infrastructure within its *Coastal Adaptation SPD (2020)*, identifying redevelopment zones and managed retreat policies.

By contrast, Ards and North Down Borough Council’s omission leaves its LDP out of step with established UK best practice for evidence-led plan making in tourism and coastal planning.

3.1.4 Consequences for Policy Formation

The absence of caravan park data affects multiple LDP policies:

- **TSM 6 and TSM 7 (Tourism Development Policies)** lack baseline evidence on supply, demand, and site characteristics;
- **ED5/ED6 (Economic Development in the Countryside)** cannot adequately reflect tourism-related enterprise;
- **UCZ 1 (Undeveloped Coastal Zone)** may unjustifiably restrict investment and adaptation at caravan parks that fall within the designation;
- **Settlement Hierarchy and Infrastructure Policies** overlook cumulative wastewater, energy, and transport demands associated with parks.

Without a complete dataset, the resulting policies are **unsound**, as they fail to demonstrate that alternative approaches were tested or that the preferred approach is justified on objective evidence.

3.1.5 Effect on LDP of deliberate omission of caravan park data

The omission of caravan park data from Clause 7.8 of the *Tourism Position Paper* represents a material failure in the LDP evidence base. Given the disproportionate reliance of Ards and North Down’s economy on caravan tourism, this gap compromises both the **soundness** and **credibility** of related LDP policies.

Rectifying this omission through a supplementary evidence study is essential to ensure that the Plan Strategy is **legally compliant, evidence-based, and deliverable**, particularly in light of the Council’s own Integrated Strategy for Tourism, Regeneration and Economic Development (2018–2030), which identifies the tourism sector as a core driver of prosperity.

4 Ards & North Down (ANDBC) DPS 2032

4.1 Policy Focus

TSM 6 sets robust quality and landscape design tests for new/extended parks (capacity to absorb; informal clustered layouts; ~15% open space; high-quality design; integration; use of mains services where practicable). We support this quality-led approach. TSM 7 recognises that allowing inappropriate development that harms tourism assets diminishes the Borough's attractiveness—an approach we support.

UCZ 1 and Policy CO 1: the Undeveloped Coastal Zone covers all coast outside settlements. CO 1 only permits development when it is of national/regional importance, there is a site-specific need, if there is no feasible alternative within settlements and if *“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 natural, coastal or historic environment.”*

Despite the limited exceptions, **this imposes an impossibly ‘high bar’**, which goes much further than protecting a ‘fragile’ coastline. It will have the practical effect of preventing almost all future development in the designated ‘Undeveloped Coastal Zone’ including on Sandycove’s four coastal caravan holiday parks.

For this reason, **we cannot support the draconian designation of the Undeveloped Coastal Zone UCZ1 as it is currently mapped and Policy CO 1 – The Undeveloped Coast.**

4.2 Newry, Mourne & Down LDP 2035 (NMD) – a comparison

NMD’s Strategic Policy CDS1 and Policy CO1 also protect the undeveloped coast but set out a fuller set of exceptions (e.g., council-led tourism at existing visitor sites, utilities and harbour/marina criteria) and include a defined route for proposals of overriding national or regional economic importance.



Cranfield Caravan Park in the 1960s. Newry and Mourne Museum Collection



Cranfield Caravan Park in the 2020s. (www.cranfieldcaravanpark.com)

NMD's TOU6 mirrors ANDBC's quality tests but adds a Sustainable Benefit Statement, requiring applicants to demonstrate positive and sustainable contribution to the tourism offer and benefits to the local community. NMD's Tourism Technical Supplement notes market trends for caravan holiday parks (more space, better landscaping, larger pitches) but cautions that well-designed proposals can still be refused if the site is fundamentally unsuitable—a proportionate balance we endorse.



Cranfield Caravan Park and other neighbouring caravan holiday parks are excluded from the 'Undeveloped Coast' CO 1 zone, highlighted above in yellow. (NMDDC Local Development Plan 2035 -Map Viewer)

4.3 Regional policy (SPPS)

The SPPS requires LDPs to support sustainable economic growth and manage tourism to balance environmental protection with development benefits. The DPS should be read and applied in that spirit of plan-led certainty and investment support.

4.4 Analysis of the Undeveloped Coastal Zone (UCZ1)

As is evident to those who live, work and enjoy the Ards Peninsula coastline, a lack of continual management is more often detrimental than beneficial to the coastline and its users. Map 1d (Undeveloped Coastal Zone) adopts a broad-brush *status quo* of the coast outside settlement limits. In principle this aligns with the SPPS, which states the undeveloped coast will rarely be an appropriate location for new development, with coastal development generally directed into settlements or existing developed nodes.

As presently drafted the UCZ designation is unsound, we will demonstrate why further on in the representation. The draft could have been improved significantly by:

- (i) distinguishing 'developed coast' where tourism, harbour/marina or long-established caravan holiday parks exist;
- (ii) aligning boundaries to clear cadastral and landscape features; and

- (iii) introducing a proportionate exception for improvements within existing caravan holiday parks that deliver net environmental, economic and community betterment.

4.5 UCZ1 proportionality, evidence gaps, refinement, and designation

4.5.1. Disproportionate effect on Ards & North Down

As Ards & North Down has the longest coastline (115 miles) of any council in Northern Ireland. It has a higher dependency on coastal tourism amenities; therefore, national coastal restraint policies (as transposed through UCZ1/CO 1) have a greater relative impact here than in predominantly inland districts. A larger share of land, businesses and community activity is caught by coastal controls. It is therefore essential that a locally-calibrated route for quality-led development within a potential 'Undeveloped Coast Zone' exists, whether by exclusion or redrafting policy. This is especially important for established caravan holiday parks and is **essential** to maintain jobs, visitor spend and community services.

4.5.2. Absence of a Coastal Zone Management (CZM) appraisal

There has been no Borough-wide CZM appraisal differentiating 'developed' and 'undeveloped' coast, assessing land usage, erosion/flood risk and adaptation options for established tourism nodes (notably caravan parks). I have included Ards Borough Council's 2006 response to the Department of the Environment's consultation on an Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026 in Annex D. It highlights many of the wider issues contained in this response that have gone unaddressed. Comparable UK areas have undertaken detailed coastal appraisals which inform policy and park adaptation measures, including:

- North Norfolk District Council's Coastal Adaptation SPD and mapped Coastal Change Management Areas (CCMAs) with relocation/adaptation pathways for caravan parks (e.g., grant support to investigate relocation options for Manor Farm Holiday Park).
- Shoreline Management Plan 2 (SMP2) frameworks across the UK, e.g., Angus Council SMP2, which set frontage-specific policies and time horizons to manage coastal change.
- Natural Resources Wales guidance for caravan and camping sites in flood/coastal risk, covering evacuation planning and business continuity for holiday parks.

4.5.3. UCZ extent relative to Environmental designations

Where UCZ1 (Map 1d) extends beyond the boundaries of statutory environmental designations (ASSI and RAMSAR) shown on Map 1c, we

recommend that such extensions only proceed where supported by a robust, site-specific assessment of the likely economic and social impacts on affected communities and businesses (including established caravan holiday parks). See Annex B for maps relating to Sandycove[®]'s holiday parks.

Pending such evidence, the UCZ should not extend beyond environmental designations or long-established 'developed coast' curtilages.

4.5.4. Outer Ards ASSI – missing appraisal of economic and societal effects

There has been no appraisal of the economic or societal impacts on towns, villages, farms, businesses and residents of the Ards Peninsula arising from the Department of the Environment's (DAERA) designation of the Outer Ards ASSI and its schedule of restrictions. Given the Peninsula's tourism-dependent economy, proportionate assessment of these effects is essential to ensure balanced policy over the plan period. There is a growing opinion amongst Ards Peninsula residents and visitors that the Outer Ards ASSI designation should be rescinded in areas that provide tourism amenity. I have expanded on this in Annex C. Whilst this is a matter for the Department of Agriculture, Environment and Rural Affairs, it is important that **Ards and North Down Borough Council should not reinforce such environmental designations through their planning policy** without a full appraisal offering similar weight to economic and community concerns.

4.6. Grounds of Unsoundness

Under the **tests of soundness** set out in the **Department for Infrastructure's Development Plan Practice Note 06**, the Draft Plan must be:

- **C1:** Consistent with regional policy (SPPS),
- **C2:** Founded on a robust evidence base,
- **CE1–CE4:** Coherent, realistic and deliverable,
- **P1–P3:** Subject to proper participation and proportionality.

UCZ1 fails several of these tests when applied to the Sandycove Holiday Homes Ltd parks.

4.6.1 Lack of Evidential Basis – Not Founded on Robust or Proportionate Evidence (C2)

The Council has not provided any site-specific assessment, landscape capacity study, or visual character mapping to justify the inclusion of the Ballyferris Holiday Park, Sandycove Holiday Park, Springvale Holiday Park or Sandend Holiday Park within the UCZ.

Instead, the boundary appears to have been drawn **mechanically** along the settlement

limit, without evaluating the *existing degree of built development or functional coastal dependence* of the area.

Each of these four parks have existed for **several decades**. They contain permanent site infrastructure such as landscaped perimeters, electrical distribution, water mains, internal road networks, communication installations, water and connections to public services.

Their developed and serviced nature is inconsistent with the definition of an “undeveloped” coastal zone.

4.6.2 Inconsistency with Regional Planning Policy (C1)

Paragraphs 6.171–6.173 of the **Strategic Planning Policy Statement (SPPS)** direct councils to identify and protect *truly undeveloped* stretches of coast while recognising that certain coastal areas are *already developed* and appropriate for continued or enhanced coastal-related uses.

By categorising active, serviced caravan parks as “undeveloped,” UCZ1 **misapplies the SPPS** and fails to distinguish between *natural* and *developed* coast.

It thereby contradicts regional guidance by imposing a blanket constraint where nuanced, evidence-based zoning is required.

4.6.3 Internal Inconsistency and Policy Contradiction (CE1, CE2)

The Draft Plan’s **Strategic Objectives for Tourism (SO5, SO6)** commit to supporting sustainable tourism and recognising the importance of the Ards Peninsula’s caravan and holiday park sector to local communities and the economy.

Yet UCZ1 would effectively **prohibit incremental improvement, expansion or modernisation** of these very parks — including essential works for flood resilience, infrastructure renewal, and decarbonisation (solar arrays, SUDS, EV charging).

This renders the Plan **internally contradictory** and fails the test of coherence and realism.

4.6.4 Failure to Balance Economic, Social, and Environmental Sustainability (CE3)

Under SPPS paragraph 1.3, sustainable development requires balancing the three pillars: **environmental protection, economic growth, and social progress.**

The UCZ1 designation prioritises environmental constraint to the exclusion of social and economic evidence.

Independent data from the **UK Caravan & Camping Alliance (UKCCA) Northern Ireland Report 2024** demonstrates that the holiday park sector contributes:

- **£390.7 million in visitor expenditure,**
- **£205.7 million GVA,**

- **7,236 full-time equivalent jobs** across Northern Ireland, with visitors staying **133% longer** and spending **24% more** than the average tourist.

In the **Ards Peninsula**, several Super Output Areas (Portaferry, Ballywalter, Millisle) are within the **top 25% most deprived in Northern Ireland** (NISRA 2023).

The Sandycove Holiday Homes Ltd holiday parks directly sustain **local employment and services** in those communities.

A policy that constrains the sector’s adaptation and reinvestment capacity therefore undermines social inclusion and regional economic policy aims.

4.6.5 Unreasonable and Disproportionate Approach (P3)

The blanket inclusion of all coastal land outside settlement limits—irrespective of existing lawful development—represents a **disproportionate application** of environmental protection policy.

This fails to meet the proportionality test in DfI’s soundness framework.

A *character-based* or *function-based* mapping exercise would have yielded a more balanced outcome.

4.6.6 Specific Consequences for Sandycove Holiday Homes Ltd

For Ballyferris, Sandycove, Sandend and Springvale Holiday Parks, UCZ1 would:

- 4.6.6.1 Prevent or severely constrain redevelopment and improvement** of pitches, amenity buildings, or service infrastructure—even where works would enhance flood resilience or environmental performance.
- 4.6.6.2 Frustrate adaptation** to climate change and renewable energy installation (e.g. solar arrays, drainage upgrades, flood storage).
- 4.6.6.3 Reduce site value and investment confidence**, by signalling policy presumption against development.
- 4.6.6.4 Create inconsistency** with other coastal settlements (e.g. Millisle, Donaghadee) where similar coastal parks are *excluded* from the UCZ because they fall within settlement limits.

This inconsistency in policy treatment cannot be justified on environmental grounds and undermines the principle of fairness and equal treatment of existing lawful land uses.

4.7 Alternative Sound Approach

To achieve compliance with the SPSS and tests of soundness, the UCZ should be amended to:

- **Exclude** the established curtilage of the four Sandycove parks from the UCZ boundary; **or**

- Introduce a **Developed Coastal Character Area** designation, applying bespoke policy criteria that permit redevelopment and environmental betterment of established coastal parks where no additional landscape or ecological harm arises.

Proposed additional UCZ1 paragraph (for Council consideration):

“Proposals for the redevelopment, rationalisation or environmental improvement of existing lawful coastal holiday parks may be permitted within the Undeveloped Coastal Zone where it is demonstrated that there will be no adverse effect on designated sites, landscape character, or flood risk, and where the proposal provides measurable environmental or community benefit.”

This amendment would maintain environmental safeguards while allowing managed, sustainable development.

4.8 UCZ1 is Unsound

The designation of **UCZ1** across the Ballyferris–Sandycove–Sandend–Springvale coastal corridor is **unsound** because it:

- Is **not founded on proportionate or site-specific evidence**;
- **Misinterprets the SPPS** by conflating developed and undeveloped coastlines;
- **Contradicts the Plan’s own tourism and rural objectives**;
- **Fails to balance social, economic and environmental sustainability**; and
- Applies a **disproportionate constraint** on a lawful, economically vital and environmentally managed land use.

Accordingly, the Plan should be **modified to exclude these established caravan parks from the UCZ**, or alternatively to adopt a **Developed Coastal Character Area** policy that recognises their long-standing role, economic contribution, and capacity for environmental enhancement.

Recommendations on UCZ1 designation

- Commission a Borough-wide CZM baseline appraisal that classifies ‘developed’ vs ‘undeveloped’ coast and identifies adaptation pathways for established holiday parks, aligned with SMP2/SFRA evidence.
- Limit the UCZ to ASSI designated areas and clearly undeveloped stretches unless and until a robust social and economic impact study justifies wider coverage.
- Apply a ‘developed coast’ sub-designation (or CCMA-style tool) around established licensed holiday parks to enable managed adaptation (pitch reconfiguration,

consolidated footprints, landscape betterment, nature-based drainage, EV/renewables) under TSM 6 quality and environmental safeguards.

- Embed NRW-style operational guidance for existing parks in at-risk locations (evacuation planning, resident/visitor safety protocols, flood communication and business continuity).



Sandend Holiday Park – April 1962



Sandend Holiday Park and Springvale Holiday Park (est. 1973) – October 2008

These images demonstrate that there has been minimal coastal change between 1962 and 2008.

4.9 Restrictions imposed by UCZ1:

Policy CO 1 signposts that within the UCZ development is only permitted in exceptional circumstances (e.g., proposals of national/regional importance that require a coastal location; limited categories such as public access/water-based recreation/small environmental projects).

- ✘ It creates a presumption against all development within the UCZ, even if required by our Ards and North Down Borough Council Environmental Health Officers as part of the caravan site licensing regime.
- ✘ It removes a straightforward route for modest, quality-led upgrades, rationalisation or diversification within existing licensed holiday parks if they fall inside the UCZ.
- ✘ This policy directly and negatively impacts our business and other established businesses within the proposed over-reaching UCZ1 zone.

4.9.1 Practical implications for Sandycove's parks

Over the plan period and beyond, our parks must react, adapt and be resilient to climate change and market trends — reconfiguring pitches, reducing impact to flood exposure and climate change; regular reinstatement of eroded areas; upgrading amenity buildings to accessibility and energy standards; adding EV charging and renewables; implementing nature-based drainage and biodiversity measures; and limited diversification (e.g., small glamping clusters). As drafted, UCZ1/CO 1 risks sterilising or delaying such investment even where works are wholly within an established licensed park boundary and would yield net environmental (native planting, habitat creation etc.), economic and social improvements.

In the Ards Borough Council's response (Annex D) to the DOENI's February 2006 consultation on an 'Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026', they stated:

"The Council expresses concern that there is no strategy in place to deal with coastal erosion, and also that landowners are not permitted to undertake reinstatement or prevention works."

This concern still exists amongst coastal landowners.

However, it is unclear why the Council appears to have changed its mind. **ANDBC are now attempting to strengthen the constraints with the UCZ1/CO 1 policy - an effective 'do nothing' strategy, justified by a 'precautionary' principle of environmental designation.**

This has led to the feeling amongst landowners and stakeholders that such consultations are for appearances only, with any derivation from a Draft Plan being seen as unacceptable.

4.9.2 Why some caravan parks appear excluded from UCZ: Where parks lie within defined settlement limits, or form part of an existing ‘developed coast’ context (e.g., at marinas/harbours or established tourism nodes), they may fall outside UCZ1 or be treated more flexibly under settlement/tourism policies. This pattern is visible on the Council’s published UCZ map and reflects SPPS support for sensitive enhancement of the developed coast while safeguarding the undeveloped coast.

4.9.3 Economic and community effects: Holiday parks generate significant local expenditure, sustain year-round and seasonal jobs, and have significant economic importance in sustaining rural villages. A blanket constraint on incremental upgrades within existing parks can defer investment, reduce off-site spend, and limit training/apprenticeship opportunities and detrimentally impact the legal operation expected by the Council. This would have a clear domino effect, impacting the local rural communities. Over time, a ‘no change’ outcome risks declining quality and competitiveness, weakening the Borough’s tourism offer.

Caravan holiday parks that are directly impacted by the ASSI designation on the Outer Ards have experienced a stagnation caused by restrictions imposed by environmental designation with minimal, if any, improvement to the environment.

They also face many of the drainage issues seen in agricultural fields. Many of these fields are outside of the Outer Ards ASSI designation but are indirectly affected by the schedule of notifiable operations which are barriers to drain management within the ASSI.

4.9.4 Appraisal of delineation: On Map 1d the UCZ includes long stretches of coast without consistently differentiating long-established tourism clusters. In places, the mapped edge appears to generalise over functional boundaries (e.g., internal roads/field lines) where precise, environmentally, economically or socially-led improvements inside existing licensed park curtilages could occur without advancing development towards the shoreline. A finer-grain boundary would retain UCZ protection while enabling targeted betterment.

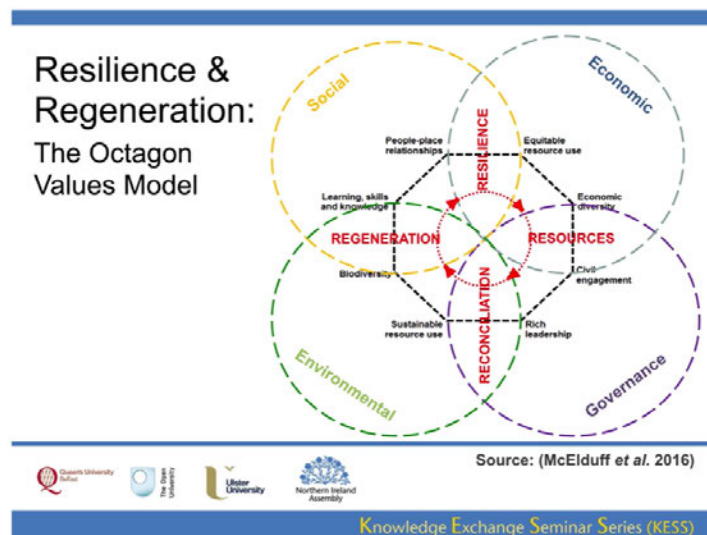
4.9.5 Recommendations to refine UCZ1 and positively manage holiday parks as ‘developed coast’.

- Map ‘Developed Coast’ pockets around established licensed holiday parks/harbours/marinas/car parks. Where a park’s curtilage is long-established, exclude that curtilage from UCZ1 (or apply a sub-designation) to allow quality-led renewal that delivers net environmental betterment.

- Introduce an UCZ1 exception for works wholly within an existing licensed holiday park boundary: pitch rationalisation, amenity upgrades, accessibility measures, renewable/EV infrastructure, drainage/nature-based solutions, landscape restructuring and modest extensions away from the shoreline—subject to landscape/seascape and biodiversity tests and TSM 6 quality criteria.
- Add a short ‘Sustainable Benefit Statement’ (as in Newry, Mourne & Down practice) evidencing local economic, community and environmental gains proportionate to scale.
- Apply a ‘no net detriment / net betterment’ test: consolidated footprints, reduced visual mass, enhanced green infrastructure, and improved edge treatments facing the UCZ.
- Use concept frameworks or park-scale masterplans to coordinate planting, drainage, circulation, dark-sky lighting and coastal character improvements in sensitive locations.

5 Coastal Community Resilience – Implications for the LDP

On 24th May 2017, Dr Linda McElduff, who was part of the planning team in the School of the Build Environment, University of Ulster, was invited by the Northern Ireland Assembly’s Research and Information Service (RaISe) to give a presentation as part of the Knowledge Exchange Seminar Series (KESS) on her three-year doctoral research project which had the “explicit aim of examining regeneration policies and practices and small coastal resorts on the island of Ireland in order to critically understand their governance and robustness for enabling resilience”.



24 May 2017 - Planning for Coastal Community Resilience

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5.1 What “Planning for Coastal Community Resilience” says.

- Coastal communities have different structural characteristics from inland areas: a heavy dependence on tourism and seasonal industries; often limited hinterland or economic diversification; vulnerability to coastal hazards (sea-level rise, coastal erosion, flooding).
- The presentation argues for adopting a resilience-led, strategic approach to coastal planning — not simply relying on static “settlement vs coast” dichotomies, but recognising the dynamic, social-ecological character of the coast and the need for planning to actively manage change (regeneration, adaptation, diversification, infrastructure resilience). (<https://niassembly.tv/planning-coastal-community-resilience/>)
- It stresses that coastal regeneration should be holistic: economic viability, social sustainability (jobs, community retention), environmental protection, and infrastructure adaptation must be considered together. (https://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series6/mcelduff240517.pdf)
- It identifies a “knowledge gap” in many coastal LDPs and plans — that is, a lack of integrated data and strategic vision to support long-term resilience, adaptation and regeneration for coastal communities. (<https://kess.org.uk/2019/03/14/planning-for-coastal-community-resilience/>)

In short: coastal communities require planning frameworks that are resilient, adaptive, evidence-based and integrated, not rigid and “one-size-fits-all”.

5.2 Why This Presentation Undermines Key Aspects of the Draft LDP

Applying the resilience-lens demonstrated in the presentation to the draft Ards & North Down LDP reveals a number of strategic failings and unsoundness:

5.2.1 *Static Coastal Zoning (UCZ1) Ignores Dynamic Coastal Realities*

- The LDP relies on a static “undeveloped coast vs settlement” zoning (e.g., UCZ1) which does not reflect changing environmental conditions, climate-driven coastal risks, or the need for adaptive coastal uses.
- By contrast, a resilience-informed plan would treat the coast as a living, changing, social-ecological system, requiring flexibility, managed regeneration and adaptation — especially for assets (like caravan parks) that are part of the social and economic fabric.

5.2.2 *Insufficient Evidence Base / “Knowledge-Gap” Approach*

The LDP’s evidence base (e.g., the Tourism Position Paper) omits key data (caravan parks, tourism-sector supply and demand, patterns of coastal use). This

replicates the “knowledge-gap” critique in the presentation: without integrated data, the Plan cannot responsibly manage coastal resilience or future pressures.

Without robust baseline data and trend projections (coastal erosion risk, sea-level rise, tourism demand, infrastructure needs), the LDP’s spatial policies are speculative rather than evidence-led — making them vulnerable to challenge on grounds of unsoundness and un-deliverability.

5.2.3 *Lack of Strategic Vision for Regeneration, Adaptation and Diversification*

- The presentation emphasises that coastal communities must proactively plan for regeneration, diversification (e.g., sustainable tourism, marine/blue economy, renewables), and social-economic resilience. The LDP, however, shows little of this: instead, it places restrictive designations (UCZ1), with limited scope for adaptation or diversification in coastal zones (especially non-settlement areas).
- This contradicts the resilience principle that planning should enable adaptation, not simply block change.

5.2.4 *Risk of Long-Term Decline for Coastal Tourism Infrastructure*

As the LDP does not provide a structured adaptation/regeneration framework, existing coastal tourism infrastructure — static caravan parks, holiday homes, tourism-related businesses — are exposed to future hazards (coastal erosion, sea-level rise, climate-driven weather events), without clear mechanisms for adaptation, relocation or managed change. That undermines the viability of those businesses, suppresses investment, and threatens local economic stability.

5.2.5 *Governance & Delivery Gaps*

The presentation calls for joined-up policy and governance to deliver resilience (marine/marine-plan integration, cross-departmental cooperation, community engagement). The LDP remains compartmentalised (tourism, environment, settlement, development), with no visible overarching coastal resilience strategy or commitment to adaptive management.

5.2.6 *Section Conclusion: The LDP is Unsound Without a Coastal Resilience Framework*

By reference to the “Planning for Coastal Community Resilience” presentation, it becomes clear that the draft LDP’s approach — particularly through UCZ1, the narrow evidence base, and lack of adaptive/regenerative policy — fails to meet the test of a sustainable, resilient, evidence-based plan for a coastal Borough.

To be sound and deliverable, the **LDP must be amended** to:

- Include a Coastal Resilience & Regeneration Policy Framework;
- Adopt integrated evidence and baseline studies (coastal risk, tourism demand, infrastructure capacity, climate impacts);
- Allow adaptive reuse, upgrade, or sensitively-designed redevelopment of coastal-zone tourism infrastructure; and
- Embed governance and delivery mechanisms for long-term coastal change (monitoring, adaptation, community engagement, marine plan alignment).

5.3 Section References

“Planning for Coastal Community Resilience” – presentation to the Northern Ireland Assembly (24 May 2017) by Dr Linda McElduff (Ulster) –

NI-wide Northern Ireland Climate Change Adaptation Programme (NICCAP) – establishing the legal/institutional basis for adaptation and resilience planning across sectors, including coastal areas. ([https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Northern Ireland Climate Change Adaptation Programme.pdf](https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Northern%20Ireland%20Climate%20Change%20Adaptation%20Programme.pdf))

“Coastal Change Adaptation Planning Guide” – outlining the principles of early adaptation, risk-based thinking, and strategic long-term coastal management for coastal communities and infrastructure. (https://www.dynamiccoast.com/files/ccapg_2023feb.pdf)

6 Inaccuracy in Policy TSM 6 and the application of British Standards (BS 3632, EN 1647, BS 8642:2024)

Policy TSM 6 plays a fundamental role in shaping the future development, renewal and diversification of caravan holiday parks within Ards & North Down. While its intention to promote high-quality design and protect sensitive landscapes is supported, the policy contains a critical flaw: it incorrectly asserts that glamping accommodation units “*fall outside the definition of a caravan by virtue of the interpretation in the Caravans Act (NI) 2011.*” This interpretation is legally unsound, technically inaccurate, and inconsistent with established UK practice and British Standards governing caravan structures.

Often there is prevalence to use marketing terms such as Shepherd Hut, Lodge, Chalet and Pod to describe tourism accommodation instead of the legally accurate definition of caravan. We see this with other forms of caravanning, with ‘Motorhome Parks’ being granted planning permission for what is legally a caravan site as defined by both the Caravans Act (Northern Ireland) 1963 and the Caravans Act (NI) 2011. Paragraph 3 of Annex G, Landscape Design Considerations for Holiday Parks, doubles down on the

error, suggesting that motor homes are different to caravan units. A chalet or lodge is a 'marketing' term and describes something that either falls within Building Regulations or the British Standards described above.

This section provides:

- a detailed legal and technical analysis of TSM 6's treatment of glamping units,
- clarification of the statutory definition of a caravan,
- evidence from operational practice in Northern Ireland,
- examples of glamping units in NI that legally qualify as caravans, and
- an explanation of relevant British Standards (BS 3632, EN 1647, BS 8642:2024) which reinforce caravan status.

6.1 Statutory Definition of a Caravan

Under s.15 of the Caravans Act (Northern Ireland) 2011, a caravan is defined as:

"any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer)... and which complies with the structure and size requirements prescribed."

The prescribed size limits allow:

- up to 20m length
- up to 6.8m width
- up to 3.05m internal height

This definition does not specify:

- material type,
- form,
- appearance, or
- frequency of movement.

A unit must simply be capable of being moved.

Under the Caravan Act (NI) 2011, therefore, timber pods, shepherd huts, S-Pods and modular glamping units clearly qualify as caravans if they meet size limits and mobility requirements.

6.2 TSM 6 Misinterpretation

TSM 6 states that glamping structures fall outside the meaning of a caravan by virtue of statutory interpretation. **This is incorrect.** The Caravan Act (NI) 2011 does not exclude glamping units, timber pods, shepherd huts, or prefabricated single-piece units. The Council's interpretation is inconsistent with:

- the wording of the Caravans Act,
- case law on mobility and temporary structures,
- NI district council caravan site licensing practice,
- UK Valuation Office Agency guidance,
- British Standards governing caravan manufacture.

Planning policy cannot redefine the meaning of a caravan in primary legislation.

6.3 Evidence That Glamping Units Are Caravans in Planning and Licensing Practice

The Tozers Solicitors briefing (2021), based on VOA evaluation, confirms that glamping pods and shepherd huts qualify as caravans because:

“the question is not whether there is an intention to move the structure, but whether it is capable of being moved.”

This is precisely the statutory test in Northern Ireland law.

Across Northern Ireland:

- Blair’s Holiday Parks use timber glamping pods that meet caravan mobility and size tests.
- Swift S-Pod ranges are factory-built and transported by lorry as single-piece caravan units.
- Glen Park Estate installs movable modular glamping structures delivered fully assembled including a Swift S-Pod 6 which they have marketed as a Woodland Lodge.
- The Perch North Coast, 9 “Glamping” pods - LA01/2017/1621/FF
- Multiple locations across NI where Shepherd huts are licensed as caravan units.



The Swift S-Pod 4 Glamping Pod at Sandycove Holiday Homes Ltd.

As such, ANDBC’s claim that glamping units are not caravans directly contradicts real-world licensing decisions and manufacturer specifications.

6.4 Implications for TSM 6

The misinterpretation leads to several policy failures:

- It forces legal caravans into an inappropriate “glamping” policy category.
- It imposes unnecessary tests (e.g., locational justification, clustering limits) that do not apply to caravans in established parks.
- It undermines investment in modern, low-impact accommodation forms.
- It creates inconsistency and legal vulnerability in decision-making.

If a unit meets the statutory definition of a caravan, Council cannot regulate it as something else.

6.5 British Standards Clarifying Caravan Status

Modern caravan and glamping structures are regulated through British and European Standards that reinforce their classification as transportable, factory-built caravan structures—not buildings.

6.5.1 BS 3632 – Residential Park Homes & High-Spec Caravan Holiday Homes

BS 3632 sets standards for:

- structure and durability,
- thermal performance,
- fire safety and ventilation,
- factory manufacturing quality.

Many high-end glamping units and pods are intentionally built to BS 3632. Compliance reinforces caravan status, not building status.

6.5.2 EN 1647 – European Standard for Seasonal-use Caravan Holiday Homes

EN 1647 governs:

- ventilation,
- safety,
- heating,
- basic services,
- electrical safety.

Many glamping pods and shepherd huts are certified under EN 1647. As a European standard for movable accommodation, EN 1647 aligns fully with the NI statutory caravan definition.

6.5.3 BS 8642:2024 – Glamping Structures

This new standard provides the UK’s first formal specification for glamping units. It addresses:

- stability,
- transportability,
- weather resistance,
- fire safety,
- safe installation.

Crucially, BS 8642 recognises glamping units as off-site manufactured, movable structures. A structure built to BS 8642 and meeting the Caravans Act dimensions is a caravan in law.

6.6 Planning Implications of the Standards

The Standards show:

- these structures are factory-built movable accommodation units,
- they are regulated as caravans,
- they are not buildings,
- they align with modern low-impact tourism design principles.

Therefore:

TSM 6’s restrictive treatment of “glamping” units is based on a technical misunderstanding.

6.7 Recommended Amendments to TSM 6

A sound policy approach would:

- Recognise that many glamping structures are caravans under the 2011 Act;
- Treat such units within existing licensed holiday parks as caravan development;
- Continue to require high-quality design and landscape integration;
- Avoid duplicating unnecessary restrictions that do not apply to caravans.

A change in TSM 6 wording is therefore recommended. For example:

“Where a pod, lodge, hut or other unit is constructed in accordance with BS 3632, EN 1647 or BS 8642:2024 and meets the statutory definition of a caravan under s.15 of the Caravans Act (NI) 2011, it will be treated as a caravan for the purposes of Policy TSM 6.”

6.8 Conclusion on TSM 6

TSM 6’s assertion that glamping accommodation lies outside the scope of caravan legislation is incorrect. The Caravans Act, UK case law, district council practice and British Standards all confirm that many modern glamping structures are caravans in law. A more enabling and legally accurate TSM 6 is essential to support sustainable investment in established coastal holiday parks.

7. Recognition that holiday parks are a net positive for Ards & North Down

Ards & North Down Borough is unique within Northern Ireland for its extensive and highly developed coastline, encompassing a diverse range of coastal settlements, rural hinterlands, and established tourism assets. Caravan Holiday Parks form an integral part of this tourism network, providing high-quality, repeat-visitor accommodation that underpins both the local economy and community life.

The Ards Peninsula in particular, demonstrates how the concentration of holiday parks sustains local businesses, supports rural employment, and provides a stable year-round economic base in otherwise seasonally challenged coastal communities. These parks are not merely tourism assets but critical rural enterprises — contributing to sustainable local economies, community wellbeing, and coastal stewardship.



Ballyferris Holiday Park – 2004



Sandycove Holiday Park - 2005

7.1 Economic Contribution of Caravan Holiday Parks

According to Frontline Consultants' 2024 Economic Benefit Report for the UK Caravan and Camping Alliance (UKCCA), the holiday park and campsite sector in Northern Ireland generated £390.7 million in direct visitor expenditure, £205.7 million GVA contribution, and 7,236 full-time equivalent (FTE) jobs in 2022/23. Additional owner expenditure on caravan maintenance and pitch-related costs added a further £154.1 million to the economy.

Visitors to caravan parks in Northern Ireland stayed 133% longer and spent 24% more per trip than the Northern Ireland tourism average. This is particularly relevant to Ards & North Down, where many of Northern Ireland's largest and longest-established coastal holiday parks are located.

In Ards & North Down alone, caravan parks represent one of the largest concentrations of privately funded tourism accommodation in Northern Ireland, providing thousands of

pitches and supporting direct and indirect employment across maintenance, retail, construction, hospitality, and recreation.

7.2 Local Economic and Community Benefits

Caravan parks provide year-round economic resilience in communities often bypassed by short-term or urban-based tourism. The UKCCA report identifies that operators across Northern Ireland spend over £9.5 million annually in wages, capital improvements, and services; employ local contractors and tradespeople; and promote biodiversity, recycling, and green energy initiatives on-site.

These findings are directly reflected in Ards & North Down, where caravan parks support local retail, provide local employment in small villages, sustain transport and waste infrastructure, enable intergenerational family tourism, and promote wellbeing through proximity to nature — aligning with public health goals.

7.3 Lack of Accurate Tourism Statistics and Institutional Responsibilities

A persistent challenge in assessing the true value of the caravan sector in Northern Ireland is the absence of disaggregated, accurate tourism statistics for owner-occupied caravan holiday homes.

NISRA published their *Data Quality Report Tourism Statistics*, last updated 19th October 2022, in which they identify which survey is utilised to collate data of the tourists that visit caravan holiday park. Given that the vast number of tourists who visit the caravan holiday parks, in Ards and North Down, come from Northern Ireland it recognised that the Continuous Household Survey which is responsible for gathering tourism data from NI residents holidaying within Northern Ireland.

It appears NISRA treat caravan holiday homes as second homes, but they fail to accept that they are stationed on a caravan holiday park. As such visitor trips and visitor spend to static caravans appears to be excluded from caravan holiday park data.

Northern Ireland Statistics and Research Agency (NISRA) has confirmed that the Continuous Household Survey (CHS) continues to **exclude** “static” caravans (i.e. owner-occupied holiday caravans) from the 'caravan park' accommodation category.

Expenditure associated with pitch fees and caravan ownership is therefore not captured in tourism 'trip spend' data.

This means that caravanners who spend £100,000 on a caravan and pay an annual pitch fee of £3000 will not have this significant spend included in the CHS.

Only the money spent on a ‘trip’ or a visit to their caravan is included - this could be zero. NISRA also acknowledged that the CHS does not distinguish between visitors staying in their own caravan, a relative’s caravan, or rented accommodation — meaning the economic contribution of parks is statistically under-reported.

[NITB8a] SHOWCARD (ACCOMMODATION TYPE)

What type of accommodation did you/they stay in during the overnight trip?

INTERVIEWER: IF STAYED AT MORE THAN ONE ACCOMMODATION TYPE PROBE FOR ACCOMODATION STAYED AT LONGEST

1. Hotel/motel
2. Guest House /Bed & Breakfast
3. Campsites, caravan or trailer park (non residential) EXCLUDE STATIC CARAVAN
4. Self catering
5. Other rented accommodation e.g. health establishments, youth hostel, marinas
6. Own holiday home/second home INCLUDE STATIC CARAVAN
7. Accommodation provided free of charge by relatives or friends
8. Other non rented accommodation

Question 8 of the NISRA Continuous Household Survey 2017/2018 diverts *Static Caravan* data away from Caravan Holiday Parks.

At a UK level, the Office for National Statistics (ONS) compiles the Tourism Satellite Accounts (TSA), which rely on NISRA data for Northern Ireland, perpetuating the under-reporting issue. At European level, the Eurostat Regulation (EU) No 692/2011 delegates responsibility for data collection to national statistical bodies — again meaning Northern Ireland’s omission flows through to EU comparative datasets.

Ards and North Down Borough Council cannot and must not rely on NISRA data to accurately reflect the economic impact that caravan holiday parks have in the Borough when forming planning policy.

'Caravanning, Camping and Glamping Sites in Northern Ireland' on the DAERA Marine Map Viewer. This official recognition that caravan holiday parks are integral to providing direct access to the marine environment, and providing a base for marine-based recreation for the many thousands of visitors strengthens the case for consistent integration of caravan parks into Northern Ireland's tourism and economic policy frameworks.

7.5 Sustainable Development and Planning Policy

Caravan Holiday Parks align with the principles of Sustainable Development as defined in the UK Sustainable Development Strategy (2005), the UN Sustainable Development Goals (SDGs), and the Regional Development Strategy 2035 for Northern Ireland. They contribute across the three pillars of sustainability:

Economic Sustainability

- Year-round revenue and reinvestment.
- Supports SMEs in rural areas.
- Attracts reinvestment into park infrastructure and renewables.

Social Sustainability:

- Creates inclusive recreational spaces.
- Strengthens community cohesion.
- Provides affordable holiday opportunities.

Environmental Sustainability:

- Encourages low-impact, static accommodation.
- Promotes on-site biodiversity and solar energy.
- Reduces carbon footprint through staycations.

Collectively, these outcomes are consistent with Planning Policy Statement 21 (Sustainable Development in the Countryside) and the Strategic Planning Policy Statement for Northern Ireland (SPPS), both of which emphasise balancing environmental protection with economic and social benefit.



Ballyferris Holiday Park and Sandycove Holiday Park – May 1961



Ballyferris, Sandycove and Ganaway Holiday Parks – 31st May 2009

These images demonstrate that there has been minimal coastal change between 1961 and 2009.

Caravan Holiday Parks represent a net positive for Ards & North Down — economically, socially, and environmentally. They are the single most important form of visitor accommodation on the Ards Peninsula, generating sustainable employment and local spending in a region where tourism is the cornerstone of rural vitality.

The lack of appropriate statistical recognition has led to systematic under-valuation of the sector’s contribution. Independent evidence (UKCCA 2024) demonstrates that caravan holiday parks are essential infrastructure in Northern Ireland’s tourism economy.

Ards and North Down Borough Council must therefore:

- **Treat and promote caravan holiday parks as key elements of sustainable coastal tourism;**
- **Publish their own licenced /unlicenced caravan holiday park data;**
- **Advocate for improved inclusion of caravan data in tourism statistics;**
- **Recognise the sector’s economic, community, and environmental value in planning policy.**

8 Where the DPS can be improved (learning from NMD)

We consider ANDBC’s objectives broadly aligning with NMD’s approach. The difference is mostly operational clarity. NMD’s explicit exceptions and its Sustainable Benefit Statement make it easier for decision-makers to support small, well-designed upgrades in the right places.

9 Proposed targeted amendments (soundness: C3 / CE2)

- Add a UCZ exclusion for established holiday parks such as Ballyferris, Sandycove, Sandend and Springvale Holiday Parks (facilitating upgrades, rationalisation and improvements).
- Adopt a ‘Sustainable Benefit Statement’ requirement within TSM 6.
- Clarify caravanning/glamping flexibility within existing parks or adjoining land.
- Strengthen the evidence base link on accommodation capacity.
- Add SPPS alignment note confirming compliance with sustainable economic growth and tourism outcomes.

10 How this will work in practice

- Site selection & layout: TSM 6’s design and layout criteria remain the gatekeeper for quality.

- Coastal protection: The UCZ exception is tightly drawn to existing licensed park boundaries and requires net environmental, economic and community betterment.
- Decision-making clarity: A Sustainable Benefit Statement ensures officers and Members can see and weigh community and economic benefits.

11 Ganaway Holiday Park and North Ards Waste Water Treatment Works

Ganaway Holiday Park is a long-established caravan park located on the eastern Ards Peninsula, between Ballywalter and Millisle. Immediately adjoining the site is an area of land situated between the Park and the newly constructed Ards North Wastewater Treatment Works (WWTW), outlined in Red below. This area, a poorly-drained agricultural field, was utilised for several years during the construction of the North Ards WWTW represents a unique opportunity for the Borough to designate an appropriately scaled, well-screened, rural employment and service node linked to the caravan and tourism sector.



Ganaway Holiday Park and Ards North Waste Water Treatment Works surrounding an area of land outlined in red.

Given the major economic contribution made by Sandycove's five licenced parks to the Ards Peninsula, the absence of a designated facility for caravan dismantling and recycling is a growing strategic issue. **There is presently no designated location in the Borough for the safe dismantling, storage, or recycling of caravans—a growing need given the aging stock across NI and tightening environmental standards.**

11.1 Policy Context and Constraints

The area currently lies outside any settlement limit and is therefore subject to PPS21 “Sustainable Development in the Countryside” and LDP draft policies for Economic Development in the Countryside (Policies ED4–ED7). These impose restrictions on new commercial or industrial buildings unless they are:

- For expansion or redevelopment of an established use (ED5/ED6);
- A small rural enterprise associated with a settlement (ED7); or
- A major economic development project requiring a countryside location (ED4).

Development here would face resistance under PPS21 due to its classification as a commercial use rather than tourism. However, the LDP now provides greater flexibility under ED5 and ED6, which specifically allow for redevelopment or expansion of established rural economic uses, where the proposal can be shown to:

- Integrate within the landscape,
- Bring environmental improvement, and
- Create or safeguard employment opportunities.

The proposed development area, being physically bounded by the WWTW and existing tourism use, constitutes a visually contained brownfield fringe suitable for a limited “caravan sector operations zone.”

11.2 Relevant Local Development Plan Policies

11.2.1 Economic Development

- Policy ED4 – Major Economic Development in the Countryside
Permits large or specialised developments requiring a countryside location, subject to need and mitigation.
- Policy ED5 – Expansion of an Established Economic Development Use
Supports expansion of existing enterprises where it does not harm rural character.
- Policy ED6 – Redevelopment of an Established Economic Development Use
Encourages redevelopment for job creation and environmental improvement.
- Policy ED7 – Small Rural Projects

Allows community-based rural start-up enterprises adjacent to settlements.

11.2.2 Waste Management

- Policy WM1 – Environmental Impact of a Waste Management Facility

Applies proximity and precautionary principles — supporting facilities that manage waste close to its source.

- Policy WM2 – Waste Collection and Treatment Facilities

Encourages re-use or redevelopment of existing or adjacent developed land for waste-related purposes, provided it does not adversely impact amenity or the environment.

This is particularly relevant to a small-scale caravan recycling and storage facility.

11.2.3 Renewable Energy

- Policies RE1 and RE2 – Renewable and Low/Zero Carbon Energy Development; Reduced Energy Consumption

These policies actively encourage local renewable energy generation, including solar installations, where landscape and environmental impacts are acceptable.

11.3 Planning Justification for Rezoning

11.3.1 Functional Synergy and Containment

The proximity of the WWTW, existing Ganaway Holiday Park, and the road network (Ganaway Road / Greystone Road) make this an ideal and sustainable location for ancillary development. The site is already visually contained by topography and mature field boundaries, and its use for small-scale workshop, waste-handling, or energy infrastructure would not intrude upon the rural landscape.

11.3.2 Compliance with Waste Management Policy

Under the Proximity Principle (WM1), waste—including obsolete caravans—should be processed as close as possible to its point of generation. Transporting old caravans long distances to depots increases road risk, cost, and carbon

emissions. Locating a specialist caravan dismantling and recycling facility near the primary source of caravan tourism waste (the Ards Peninsula) aligns fully with both the NI Waste Management Strategy (Delivering Resource Efficiency, 2013) and the Climate Change Act (NI) 2022 targets for resource efficiency.

11.3.3 Renewable Energy Integration

The location is suitable for solar photovoltaic (PV) arrays, providing both operational power for workshop activity and feeding into local caravan parks' decarbonisation programmes. The adjoining WWTW and existing utility infrastructure strengthen grid access feasibility, in line with Policy RE1/RE2.

11.3.4 Economic and Environmental Benefits

- Job creation in skilled trades (maintenance, dismantling, waste sorting).
- Circular economy benefits through recycling of aluminium, plastics, and reusable components.
- Reduction in illegal caravan dumping and abandonment.
- Lower transport emissions and improved waste traceability.
- Support for Council climate objectives and compliance with "Roadmap to Sustainability 2021–2028."

11.3.5 Landscape and Environmental Integration

The Ecological Appraisal of the area that was published on the planning portal (LA06/2018/0906F) found no significant ecological constraints; the field is of low biodiversity value, being improved grassland. The WWTW already establishes an industrial edge, meaning further low-intensity development would not alter rural character materially.

11.4 Recommended Zoning Options

Three planning mechanisms could sensibly regularise and enable this development:

Option	Zoning Classification	Supporting Policy Basis	Comments
A. Rural Economic Development Node	Extension of economic zoning under ED5/ED6	Allows co-location of tourism-related and recycling uses; flexible small-scale commercial scope	Preferred – fits existing pattern and maintains landscape character
B. Waste Management / Resource Recovery Site	Partial zoning under WM2	Permits controlled waste sorting and treatment; aligns with proximity principle	Suitable if focus is on recycling/disposal

C. Renewable Energy and Resource Park	Combined RE1/WM2 allocation	Allows solar, EV infrastructure, storage, and waste recycling	Provides integrated sustainability benefits
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11.5 Why a Caravan Recycling Facility Must Be Near the Parks

Safety: Caravans are oversized, hazardous units requiring regulated dismantling by trained personnel in controlled environments. Their structure, particularly the chassis, has often been weakened by prolonged exposure to salty sea air. Long-distance transport, especially on uneven roads, increases risk of accidents and environmental spillage.

Cost Efficiency: The economics of end-of-life caravan recovery depend on short transport distances; otherwise, disposal becomes unviable, leading to fly-tipping and illegal storage.

Regulatory Compliance: Under the Waste Framework Directive (2008/98/EC) and Policy WM1, treatment close to the point of generation is required.

Sectoral Sustainability: With approximately 20,000 static caravans in NI, the absence of local recycling facilities threatens compliance with the Circular Economy Package and NI's climate commitments.

11.6 Section conclusion and Recommendation

Given its strategic location, containment by existing infrastructure, and functional linkage to tourism operations, the Ganaway site offers an ideal location for a Caravan Sector Support and Sustainability Zone. It would:

- Facilitate safe and legal dismantling and recycling of caravans,
- Allow limited solar generation and storage for carbon reduction, and
- Provide essential operational capacity for the continuing viability of the caravan holiday park sector on the Ards Peninsula.

Recommendation:

That the Council rezone the lands between Ganaway Holiday Park and the Ards North WWTW as a "Rural Economic Development Site" (ED6/WM2 hybrid) in the LDP Local Policies Plan, permitting low-impact commercial, waste recovery, and renewable energy uses directly linked to the local caravan tourism industry.

12 Annex G – Landscape Design Considerations for Holiday Parks

Annex G sets a series of nine mandatory design principles that all new and extended holiday parks must adhere to. While ostensibly presented as design guidance, they are **explicitly referenced** in Policy TSM 6 as part of the required assessment criteria for holiday park proposals, meaning they effectively become **development plan policy requirements**.

Given the established nature of caravan parks along the Ards Peninsula (e.g. Ballyferris, Sandend, Springvale, Rockmore, Sandycove), Annex G raises major practical and legal difficulties.

12.1 Clause-by-Clause Analysis: Operational & Compliance Difficulties

G.1(1) – “Appropriate link with the surrounding landscape”

Issue:

Most existing coastal caravan parks on the Ards Peninsula sit in open, visually exposed coastal landscapes and were lawfully established decades before modern landscape character guidance existed. Many sites have no “natural” landscape backdrop. Attempting to “link” such sites to the landscape through tree belts, woodland or large planting blocks is **ecologically inappropriate**, **physically impossible** on thin coastal soils, and often **incompatible with ASSI restrictions**, which frequently prohibit introduction of non-native vegetation.

Ramifications:

- Could prevent park expansions because existing sites cannot meet this test.
- Could require artificial or out-of-character planting that is *itself* environmentally harmful.
- Presents a potential **policy contradiction**: DAERA frequently objects to “new planting” on ASSI dunes and maritime grassland.

G.1(2) – 3-metre internal buffer zone on all boundaries

Issue:

A mandatory 3-metre undeveloped buffer strip around *all* boundaries is a substantive **loss of developable area**. This conflicts directly with real-world site layouts where static units are traditionally arranged close to boundaries to maximise sea views.

Ramifications:

- **De-densification pressure**: Existing parks would be unable to replace or modernise units on a like-for-like footprint.
- **Asset devaluation**: Reducing capacity by 10–20% in older parks, which are typically long and narrow.
- **Conflict with Model Licence Conditions 2025**: These already define separation distances. Adding an LDP buffer creates *dual regulatory burdens*.
- **Unsoundness**: Fails soundness test CE2 (proportionate and evidence-based). No impact study presented.

G.1(3) – Informal layout; avoidance of regimented rows

Issue:

“Regimented rows” are a **defining characteristic of many long-established static caravan parks**. These layouts exist because:

- they maximise coastal views;
- utilities were historically laid out in linear services trenches;
- fire safety/spacing was governed under older licence conditions;
- customers prefer predictable layouts close to sea view frontages.

Ramifications:

- Would make most existing parks technically “non-conforming”.
- Replacement or rearrangement of units may be refused because maintaining existing rows would “fail” Annex G.
- Contradiction: The Model Licence Conditions 2025 (Holiday Sites) favour structured spacing, not informal clustering.

Policy unsoundness:

- This clause disregards the **operational model of static caravan parks** and lacks demonstrated evidence that an “informal” layout is safer, more sustainable or more desirable.

G.1(4) – Avoidance of long straight roads

Issue:

Straight internal roads are required for:

- emergency vehicle access,
- refuse collection,
- maintenance of utilities corridors,
- ensuring level gradients on coastal slopes.

Curved “organic” roads are **impractical** on narrow coastal strips and unsafe in confined parks.

Ramifications:

- Could prevent upgrades to internal routes.
- Forces redesign against safety and operational best practice.
- Direct conflict with fire tender access requirements under the site licence.

G.1(5) – Integration using muted colours and “local materials”

Issue:

Caravans are manufactured products (Swift, Willerby, ABI) and come factory-finished in limited colour palettes. Requiring “local materials” conflicts with:

- British Standards (BS 3632 residential spec units, EN 1647 touring spec)
- Manufacturer warranties
- Fire safety (e.g., prohibition on certain timber claddings)
- “Muted green tones” can also fade rapidly in coastal saline environments.

Ramifications:

- Creates unreasonable and unenforceable controls.
- Council could attempt to impose colour conditions inconsistent with the Caravans Act and manufacturers' specifications.

G.1(6) – Permeable surfaces for pitches and parking

Issue:

Permeability is good practice in principle, but static caravans require:

- level engineered bases;
- hardstanding that does not subside on soft dune sands;
- sealed impermeable bases for compliance with BS standards for stability.

Permeable surfaces on sandy/dune soils can cause **structural failure**.

Ramifications:

- Could force unsafe or unstable pitch foundations.
- Conflict with Model Licence Conditions requiring stable, load-bearing foundations.

G.1(7) – Extensive planting for landscape/character benefits

Issue:

Many ASSI locations (Outer Ards ASSI) **prohibit** introduction of shrubs or trees because they damage dune systems and support predators of ground-nesting birds. "Appropriate planting" is therefore impossible. Equally the introduction of hedgerows, shrubs or trees are often view as a fire risk by Environmental Health Officers.

Ramifications:

- Parks in or adjacent to ASSI land cannot comply.
- DAERA will object to any exotic planting, meaning the policy itself may create planning refusals.

G.1(8) – Retention of ponds, trees, hedgerows, archaeology

Issue:

Coastal dune systems rarely contain hedgerows or ponds. But "retention" of archaeology (if found) can sterilise entire parts of a site. There is no proportionate test.

Ramifications:

- Site redevelopment could be blocked by incidental archaeological finds.
- Requirement is without an evidential risk assessment – a soundness flaw.

G.1(9) – 15% communal open space; “residual land will not be acceptable”

Issue:

Many existing coastal parks cannot achieve 15% open space without mass displacement of units. They were designed before such standards existed. Requiring 15% for *extensions* effectively forces whole-site redesigns.

Ramifications:

- Could prevent modernisation (new bases, unit upgrades, EV points, amenity buildings).
- Financial impact: reducing pitch capacity reduces viability and undermines investment.
- Unsound because no viability assessment is provided and no recognition of legacy layouts.

13 Annex H – Tourism Information for a Tourism Benefit Statement

Annex H sets criteria for “Economic”, “Community”, “Environmental” and “Locational” sustainability. These become **mandatory justification tests** for any proposal requiring a Tourism Benefit Statement (TBS). They directly affect holiday park extensions because Policy TSM 6 requires demonstration of sustainable tourism outcomes.

13.1 Clause-by-Clause Analysis

H.1 – Economic Sustainability

Expectations include “significant employment,” “significant spend,” “enhancing the range and quality,” and “extending the tourist season.”

Issues:

- Most caravan park extensions are **incremental** (e.g., extension of 20 pitches). They may *not* create “significant employment.”
- Caravan parks already operate at near full seasonal occupancy; adding units does not meaningfully extend the season.
- Holiday caravans are typically owner-occupied, not let, so visitor “spend” is diffuse and difficult to evidence.
- The Council is requiring **empirical economic modelling** that small operators cannot deliver.

Ramifications:

- Disproportionate burden on small and medium-sized operators.
- Policy likely to produce arbitrary refusals due to “insufficient economic benefit.”
- Not supported by SPPS, which does **not** require economic uplift tests for holiday parks.

H.2 – Community/Social Sustainability

Requires facilities accessible to the local community, or contribution to regeneration.

Issues:

- Caravan parks are **private sites** and cannot open playgrounds or facilities to the general public for liability and insurance reasons.
- Parks in rural areas (Outer Ards) are *not located in regeneration zones*.

Ramifications:

- Creates tests impossible for operators to meet.
- Could lead to refusal of otherwise acceptable developments.

H.3 – Environmental Sustainability

Includes protection of environmental assets, green transport, and visitor management on fragile sites.

Issues:

- Many parks already sit adjacent to or partially within ASSI designations. Operators **cannot improve** these assets because DAERA restricts intervention.
- “Green transport” (bus links, rail links) is impossible on the Ards Peninsula due to the absence of rail infrastructure and limited bus service.
- Visitor management is somewhat irrelevant, as holiday caravan parks have stable predictable occupancy, not mass tourist footfall.

Ramifications:

- Policy creates theoretical tests not grounded in the nature of caravan parks.
- Could generate objections that operators cannot remedy (e.g., “no public transport access”).

H.4 – Locational Sustainability

Requires accessibility via public transport, cycling, and proximity to other tourism.

Issues:

- Static caravan parks intentionally locate on **remote scenic coastline**.
- Public transport rarely serves these areas.
- Cycle access may be dangerous on narrow rural roads.

Ramifications:

- Existing parks inevitably “fail” the test.
- Could prevent any expansion of coastal parks despite their historic role as core economic tourism infrastructure.

13.2. Impacts on Caravan Parks near or within Outer Ards ASSI

13.2.1 Unique Constraints

The Outer Ards ASSI is designated for:

- wintering birds;
- dune systems;
- sensitive vegetation;
- geodiversity interest.

DAERA prohibits:

- new planting;
- landscaping that alters dune morphology;
- imported soils;
- new paths or cycleways;
- lighting that disturbs birds.

13.2.2 Annex G Creates Inbuilt Contradictions

Annex G demands:

- planting schemes,
- tree belts,
- new open space,
- informal pathways,
- screening vegetation.

All of these are **incompatible** with ASSI management guidance.

13.2.3 Planning Consequence

Under the Habitats Regulations, council apply a **precautionary approach**, so failure to meet Annex G can lead to refusal — but **meeting** Annex G could *also* trigger refusal due to harm to the ASSI.

This is the definition of an **internally contradictory and therefore unsound policy framework**.

14 Assessment under the Soundness Tests

The LDP must satisfy the eight soundness tests (P1, P2, P3, C1, C2, C3, CE1, CE2). Annex G and H fail several:

14.1 Soundness of Annex G

Failing CE2 – Proportionate Evidence

No evidence base is provided showing:

- how informal layouts improve tourism;
- why 15% open space is proportionate;
- why 3-metre buffers are needed;

- why regimented rows cause demonstrable harm.

Failing CE1 – Reasonable Alternatives Not Considered

No alternative standards for legacy holiday caravan parks (which comprise the majority of holiday caravan parks in the Borough) were assessed.

Failing C3 – Consistency with Other Policies / Higher Level Strategies

- Conflicts with the Model Licence Conditions 2025
- Conflicts with DAERA ASSI management rules.
- Contradicts SPPS requirement that policies must enable rural economic development and support established tourism assets.

Failing P2 – Fit with Regional Policy

SPPS supports coastal tourism and rural tourism development. Annex G’s restrictive design standards suppress development.

14.2 Soundness of Annex H

Failing CE2 – Not Evidence-Based

Criteria require tests (economic uplift, community benefit) that are disproportionate and unsupported by evidence.

Failing P3 – Culturally/Sectorally Appropriate

Smaller holiday caravan parks, especially owner-occupied parks, generate less employment or community facilities than larger parks, or groups of parks (several holiday caravan parks owned and operated by the one company). Annex H criteria are modelled on large tourism venues (e.g., hotels) and mis-applied to static caravan sites.

Failing C1 – Cohesion with the Plan

Annex H undermines Policy TSM 6 by requiring large-scale benefits even for small extensions.

14.3. Summary of Annex G and Annex H

Annexes G and H, as drafted, are **over-prescriptive, insufficiently evidence-based, and not reflective of the operational reality** of the holiday caravan industry in Ards & North Down — an industry that is foundational to the local tourism economy, particularly on the Ards Peninsula.

For existing and coastal caravan parks, including those near/in Outer Ards ASSI, the annexes create:

- **Compliance impossibilities** (e.g., required planting where planting is prohibited).
- **Capacity losses** (buffer zones, clustering requirements, open space quotas).
- **Economic harm** (inability to reinvest or modernise).

- **Grounds for refusal** for even modest improvements.
- **Contradictions** between planning, environmental and site licence regimes.

14.4. Soundness

Annex G and Annex H **do not meet the tests of soundness** under the Planning Act (NI) 2011. They require substantial revision to:

- provide proportionate, flexible standards for legacy holiday caravan parks;
- recognise the constraints of the ASSI designation on the Ards coastline;
- align with Model Licence Conditions and British Standards;
- avoid imposing hotel-style tourism benefit tests on static caravan parks;
- support sustainable development rather than sterilise it.

15 Conclusion

Sandycove Holiday Homes Ltd welcomes the Council's vision of a vibrant, sustainable visitor economy. With the targeted amendments above ANDBC can unlock investment in established holiday caravan parks, deliver measurable local benefits, and protect the special character of the Ards Peninsula coast.

However, in its current form the ANDBC Local Development Plan 2032 is unsound.

This unfortunately poses a risk to our Borough in terms of future development and growth, as currently drafted it will jeopardise the decision making process within Ards and North Down Borough Council for years to come.

Online references

- Ards & North Down LDP Draft Plan Strategy – hub page (Maps incl. UCZ 1d):
<https://www.ardsandnorthdown.gov.uk/article/2650/Draft-Plan-Strategy>
- Direct link: Map 1d – Undeveloped Coastal Zone (PDF):
https://www.ardsandnorthdown.gov.uk/media/2840/Map1D-AND-Undeveloped-Coastal-Zone/pdf/9dMap1D_AND_Undeveloped_Coastal_Zone.pdf
- SPPS (DfI) – Strategic Planning Policy Statement: <https://www.infrastructure-ni.gov.uk/publications/strategic-planning-policy-statement>
- NMD LDP – Preparatory Paper 8: The Coast (developed vs undeveloped coast):
https://www.newrymouredown.org/media/uploads/ldp_paper_8_-_coast%281%29.pdf
- UKCCA ‘Pitching the Value’ (2024) – sector economic impact:
<https://www.ukcca.org.uk/report-2024/>
- ANDBC LDP Draft Plan Strategy – Maps hub (Map 1c Environmental Designations; Map 1d UCZ): <https://www.ardsandnorthdown.gov.uk/article/2650/Draft-Plan-Strategy>
- DAERA – Outer Ards ASSI: site citation documents and map: <https://www.daera-ni.gov.uk/publications/outer-ards-assi>
- North Norfolk District Council – Coastal Adaptation SPD: <https://www.north-norfolk.gov.uk/media/9765/ex020-coastal-adaptation-supplementary-planning-document.pdf>
- Angus Council – Shoreline Management Plan 2 (SMP2):
<https://www.angus.gov.uk/sites/default/files/SMP2%20Main%20Document%20FINAL.pdf>
- Natural Resources Wales – Guidance for caravan and campsites owners and operators:
<https://naturalresources.wales/flooding/guidance-for-caravan-and-campsites-owners-and-operators-1/?lang=en>

Annex A – Policy Comparison and Recommended Amendments

Policy reference	Current Draft wording (summary)	Issue / effect	Recommended revision & justification
CO 1 / UCZ1 (Undeveloped Coastal Zone)	Strong presumption against development outside settlements along the coast, with limited exceptions (national/regional need; public access; water-based recreation; small-scale environmental projects; etc.).	As applied across a very long coastline with many established licensed holiday parks, the policy can unintentionally sterilise modest, quality-led upgrades and adaptation works within existing park curtilages, even where these would deliver net environmental, economic and community betterment.	Exclude existing licensed holiday parks from the 'Undeveloped Coastal Zone'. Add an exception in the Undeveloped Coastal Zone for land adjacent to the boundary of an existing licensed holiday park (for pitch rationalization and improvement, amenity upgrades, accessibility, EV/renewables, drainage/nature-based solutions, landscape restructuring, boundary reparations, modest extensions away from shoreline) subject to landscape/biodiversity tests, and TSM 6 quality criteria. Map 'Developed Coast' pockets around long-established parks. Justification: SPPS support for sustainable economic growth; NMD LDP TOU6 (Sustainable Benefit Statement); sector evidence on local spend and jobs.
UCZ extent relative to Map 1c (Environmental Designations)	UCZ mapping extends over large coastal tracts and, in places, beyond statutory environmental designations.	Risk of overbreadth without site-specific evidence of economic and social effects on coastal communities and established tourism assets; may unduly constrain viable renewal.	Do not extend UCZ beyond current ASSI designations or long-established developed-coast curtilages unless supported by a robust social and economic impact study. Where evidence is incomplete, limit UCZ to designated or clearly undeveloped

			stretches pending further study.
TSM 6 New/Extended Holiday Parks & Glamping	Quality-led criteria: capacity to absorb; informal clustered layouts; ~15% open space; integration; use of mains where practicable.	No explicit route for adaptation/upgrade within UCZ-situated established parks; benefits not systematically evidenced.	Introduce a 'Sustainable Benefit Statement' (as per NMD TOU6) evidencing local economic, community and environmental gains; clarify glamping flexibility within existing parks; use concept frameworks/masterplans for sensitive coast to coordinate planting, drainage, circulation and dark-sky lighting.
TSM 6 New/Extended Holiday Parks & Glamping	"Glamping accommodation units fall outside the definition of a caravan by virtue of the interpretation in the Caravan Sites Act (NI) 2011."	Unsound and legally incorrect.	Amend TSM6 to state "Where a pod, lodge, hut or other unit is constructed in accordance with BS 3632, EN 1647 or BS 8642:2024 and meets the statutory definition of a caravan under s.15 of the Caravans Act (NI) 2011, it will be treated as a caravan for the purposes of Policy TSM 6."
TSM 7 (Safeguarding Tourism Assets)	Seeks to prevent development that would adversely affect tourism assets.	Without positive wording, renewal and environmental betterment projects within existing parks may be treated as harm by default.	Add supportive text recognising that well-designed renewal within existing parks can enhance tourism assets and landscape character, subject to strict quality and environmental safeguards.

Annex B – UCZ and Environmental Designations (Illustrative Map Extracts showing extent of UCZ beyond ASSI)

Policy CO 1 would effectively halt all development within the Undeveloped Coastal Zone UCZ1. This is likely to

Ballyferris Holiday Park



Ballyferris Holiday Park – 211 Whitechurch Road, Ballywalter



Ballyferris Holiday Park with ASSI area highlighted (yellow).

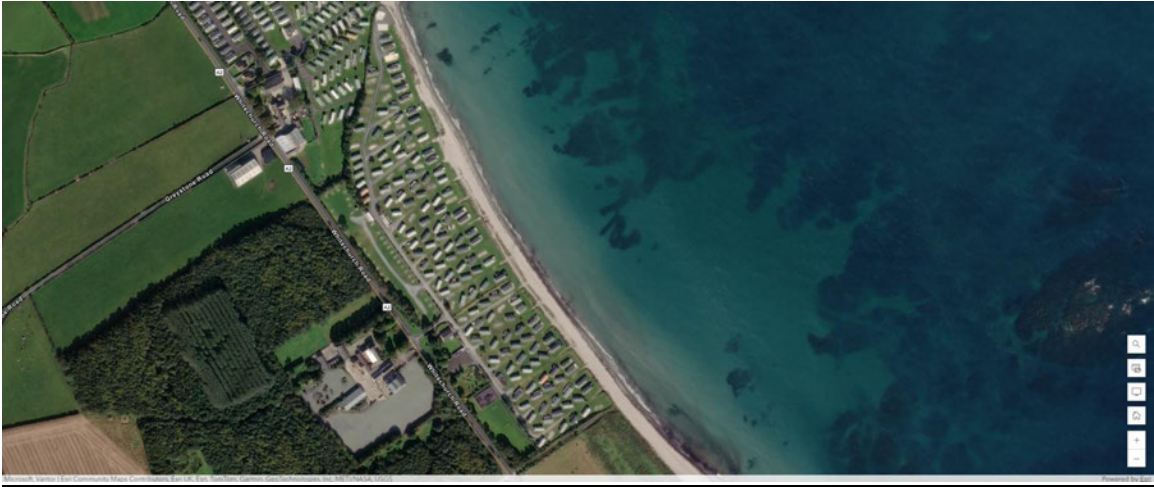


Ballyferris Holiday Park with UCZ area highlighted (blue).



Ballyferris Holiday Park with UCZ and ASSI areas highlighted.

Sandycove Holiday Park



Sandycove Holiday Park – 191 Whitechurch Road, Ballywalter



Sandycove Holiday Park with ASSI area highlighted (yellow).

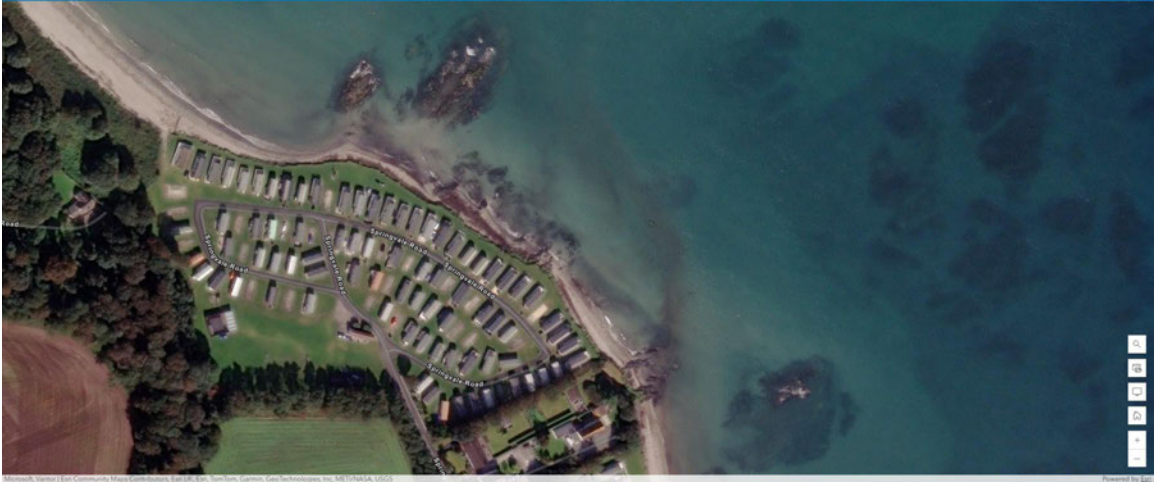


Sandycove Holiday Park with UCZ mainland area highlighted (blue).



Sandycove Holiday Park with UCZ mainland and ASSI areas highlighted.

Sandend Holiday Park



Sandend Holiday Park – 28 Springvale Road, Ballywalter



Sandend Holiday Park with ASSI area highlighted (yellow).



Sandend Holiday Park with UCZ mainland area highlighted (blue).



Sandend Holiday Park with UCZ mainland and ASSI areas highlighted.

Springvale Holiday Park



Springvale Holiday Park – 22c Springvale Road, Ballywalter



Springvale Holiday Park with ASSI area highlighted (yellow).



Springvale Holiday Park with UCZ mainland area highlighted (blue).



Springvale Holiday Park with UCZ mainland and ASSI areas highlighted.

Annex C –Outer Ards Area of Special Scientific Interest (ASSI)

1. Declaration of the Outer Ards ASSI

The 22nd December 2002 declaration of the Outer Ards Area of Special Scientific Interest states:

“The Outer Ards area is important for its geological features, and its coastal plant and animal communities.”

The Ards and North Down Borough coastline is approximately 115 miles (~185km), making the Outer Ards ASSI potentially the longest coastal ASSI designation in the United Kingdom. The contains approximately 8% of the total coastline of Northern Ireland.

1.1 Geology and Geomorphology

The ASSI includes internationally significant exposures of Silurian and Ordovician rocks, particularly around the Orlock Bridge Fault Zone. Storm beaches, raised beaches, barrier spits and active erosional cliffs form dynamic coastal landforms that were considered exemplary at the time of designation.



The mechanical relocation of sand from Millisle Beach – April 2006

1.2 Intertidal and Marine Habitats

The Outer Ards supports extensive rocky platforms, boulder shores, sand and mud flats, rich algal communities, and lower-shore assemblages representing some of the highest biological diversity in Northern Ireland. The red algal zone in particular is cited as a notable feature.

2.3 Terrestrial Coastal Habitats

The fringe includes cliff-ledge vegetation, maritime heath, dune remnants and saltmarsh–fen transitions. Several rare or localised plant species are referenced in the citation.

2.4 Ornithological Interest

The area supports internationally important non-breeding populations of:

- Light-bellied Brent Goose,
- Turnstone, and
- Ringed Plover.

Some of the highest UK shoreline densities of Turnstone and Ringed Plover occur along this coastline. Cockle Island hosts regionally significant colonies of breeding terns.

2.5 Marine Mammals

The coastline contains established haul-out areas for Grey Seal and Common Seal, further contributing to the site's multi-feature designation.



Removal and replacement of sea defences for Residential Property Ballyvester Beach – May 2010

2. Boundary Appraisal: Exclusion of Bangor Marina

2.1 Basis for Exclusion

Bangor Marina is excluded from the ASSI because it is an **engineered, artificial coastal structure** whose ecological character is fundamentally altered from the natural and semi-natural habitats underpinning the ASSI. The marina basin comprises:

- reinforced quay walls,
- dredged berths,
- breakwaters,
- pontoons,
- high-traffic berthing and servicing facilities.

These features are incompatible with the sedimentary, intertidal and biological processes that justify ASSI designation.

2.2 Policy Context

Local Development Plan (LDP) evidence classifies Bangor Waterfront as a **strategic regeneration area**, emphasising:

- public access improvements,
- recreation,
- tourism,
- cultural and commercial development, and
- marine leisure infrastructure.

All these aspects are shared with Sandycove Holiday Homes Ltd's coastal caravan holiday parks whereas Sandycove's caravan pitches exceed the number of berths in Bangor Marina, catering for more visitors who stay longer.

This policy framework is inherently inconsistent with ASSI objectives, which aim to **protect natural processes**, maintain habitat integrity, and avoid disturbance to qualifying species.

2.3 Logical Boundary Transition Point

The transition between the **Outer Belfast Lough** designations and the **Outer Ards ASSI** occurs at **Helen's Bay / Grey Point**. This is where the character of the coastline shifts from urbanised harbour frontage to largely semi-natural rocky shore. The exclusion of Bangor Marina is therefore ecologically and geographically justified.

3. Absence of Economic Appraisal

ASSI designations in Northern Ireland are governed by the **Nature Conservation and Amenity Lands (NI) Order 1985**, which is **science-led** and makes **no provision** for socio-economic

evaluation when declaring or modifying an ASSI. It should be noted that the ‘Precautionary Principle’, removed the need for scientific certainty. It came into prominence in the 1987 Montreal Protocol, gaining international recognition in the 1992 Rio Declaration and then being incorporated into EU regulations and UK domestic law. It has been argued that use of the ‘Precautionary Principle’ has stifled innovation, reduced investment, shifts the burden of proof, is applied inconsistently to the point that it paralyses development.

3.1 Intended Purpose of ASSI Designation

The legal test concerns **scientific interest only**. As such, there is:

- no consideration of development potential,
- no assessment of tourism value,
- no balancing of economic impacts on farming, tourism or land management, and
- no evaluation of infrastructure or regeneration priorities.

3.2 Implications for Planning

As a result:

- The ASSI cannot be criticised solely for lacking economic appraisal — this is outside its statutory remit.
- However, **the LDP, coastal strategy, and project-level EIAs *must* provide socio-economic balance**.
- The absence of such analysis in regional policy creates a **vacuum**, leaving **significant land-use decisions being influenced by an instrument that was never designed to weigh economic consequences**.

4. Avian Influenza (AIV) Impacts on Outer Ards Qualifying Features

4.1 Overview

Avian influenza (AI), commonly known as bird flu, is a highly contagious viral disease affecting the respiratory, digestive and/or nervous system of many species of birds. It may also pose a threat to people and other animals in certain circumstances.

Since 2021, highly pathogenic avian influenza (HPAI H5) has caused unprecedented mortality in seabirds across the UK and Ireland. Species affected include terns, gulls, gannets, skuas, and wintering waterbirds.

Given its importance for **Brent Geese, Turnstone, Ringed Plover, Eider**, and several tern species, the Outer Ards coastline is at heightened ecological risk.

4.2 Implications for ASSI Management

Key considerations include:

Disturbance Sensitivity

During AIV outbreaks, birds experience greater energetic stress. Disturbance from walkers, dogs, kayaking, paddleboards and shoreline events exacerbates mortality.

Carcass Management

DAERA now provides wild-bird carcass reporting protocols for AIV surveillance. ASSI managers and councils must proactively monitor and remove carcasses at key roosts.

Seasonal Restrictions

Breeding, staging and wintering periods may require enhanced temporary controls on coastal access.

Biosecurity Measures

Contractors undertaking coastal maintenance require AIV-aware risk assessments (PPE, hygiene controls, no bird handling, and safe waste protocols).

4.3 Planning Implications

Where new coastal development or increased public access is proposed, **AIV vulnerability** must now be considered in ecological impact assessments.

5. Field Drainage Restrictions and Land Management Impacts

5.1 Context

Large areas of farmland and caravan holiday parks adjacent to the Outer Ards ASSI rely on traditional **field drains, tile systems, open ditches and outfalls** constructed over decades. Regular maintenance is essential to avoid waterlogging.

However, because drainage interventions fall under the ASSI's **Notifiable Operations**, they are subject to stringent controls.



Flooding fields on the Whitechurch Road – 14th November 2025



Flooding Fields on the Whitechurch Road – 4th December 2025



Flooding fields on the Whitechurch Road – 27th January 2026

5.2 Relevant Notifiable Operations

The Outer Ards ASSI declaration explicitly identifies as potentially damaging:

- **Altering drainage**, including deepening, widening, blocking or dredging watercourses
- **Maintaining or constructing** ditches, drains or watercourses
- **Changing the water table** or hydrological regime
- Activities affecting wetland, intertidal or saltmarsh hydrology

Even routine operations such as rodding drains, clearing silt, or repairing collapsed outfalls may require **DAERA consent**.

5.3 Consequences for Landowners

1 **Consent Delays or Refusal**

Drainage works often require seasonal restrictions and prolonged consultation.

2 **Siltation and Capacity Loss**

Without regular maintenance, many drains backing onto the foreshore become partially blocked, reducing agricultural productivity and tourism amenity.

3 **Prohibition on New Drainage Infrastructure**

Installation of new drains or upgrading existing systems in hydrologically connected areas is frequently restricted.

4 Catchment-Wide Impact

Even land outside the mapped ASSI may be affected if their drains discharge into ASSI watercourses.

5.4 Ecological Rationale

The restrictions aim to protect:

- groundwater-dependent fen/wetland habitats,
- brackish and saltmarsh vegetation,
- intertidal invertebrate populations sensitive to turbidity,
- natural salinity gradients and hydrological dynamics.

5.5 Planning and Management Recommendations

- Develop **Drainage Management Plans (DMPs)** clarifying low-risk maintenance activities.
- Introduce **standing consents** for routine works with minimal ecological risk.
- Use **monitoring wells and salinity testing** to demonstrate hydrological neutrality.
- Support landowners, including caravan holiday parks, through **agri-environment funding** where drainage restrictions impose a cost.

6. De-classification and Review of ASSI Areas

6.1 Legislative Basis for De-notification

Under Article 25 of the Nature Conservation and Amenity Lands (NI) Order 1985, **DAERA may vary or withdraw an ASSI where the site no longer satisfies the scientific criteria.**

Similar provisions exist across the UK under Section 28C of the Wildlife and Countryside Act 1981.

6.2 Findings of the UK Public Accounts Committee (PAC)

The PAC's Thirty-Fourth Report was highly critical of the lack of systematic review of SSSI/ASSI networks. Key findings:

- Many designations are **decades old**, with no mechanism to confirm they still contain special features.
- Fewer than **1%** of site descriptions had been updated since 2001.
- Pilot studies indicated **6–12%** of designated sites may no longer qualify.
- Conservation expenditure risks being misdirected to degraded or obsolete sites.

6.3 Drivers for De-classification

A site or section may merit de-notification where:

1. **Qualifying features are lost** through natural succession, erosion or irreversible habitat change.

2. **Baseline data** used at designation is outdated or inaccurate.
3. **Urbanisation or hard engineering** has permanently altered site characteristics.
4. **Climate change** renders original conservation objectives unattainable.
5. Greater biodiversity value exists in alternative or newly forming habitats.

6.4 Application to the Outer Ards ASSI

Several stretches of the Outer Ards coastline have undergone major change since designation:

- Extensive **rock armour**, dredging, and shoreline defences have modified coastal processes.
- Certain intertidal habitats have been replaced by engineered shorelines.
- Saltmarsh and lagoon areas have been lost or truncated through erosion and sea-level rise.
- Some agricultural margins no longer support the wet grassland communities cited in the original notification.

These factors suggest a **targeted review** could identify areas for:

- boundary adjustment,
- partial de-notification, or
- re-focusing conservation effort on higher-value areas.

6.5 Recommendations for Reform

To modernise the ASSI network:

- Establish a **six-year review cycle** similar to SSSI condition assessments elsewhere in the UK.
- Publish criteria and procedures for **de-notification** or modification.
- Provide full public consultation during reassessment.
- Redirect management funding to sites that still deliver high ecological value.
- Identify **replacement or compensatory sites** where needed (e.g., new intertidal creation).

7. ASSI Conclusion

The Outer Ards ASSI remains designated as an area of significant scientific interest; however, substantial portions of the coastline have undergone major environmental, geomorphological and ecological change since designation.

A modernised, evidence-led approach is therefore required, addressing:

- boundary rationalisation where features are no longer present,
- clearer integration with economic and planning frameworks,
- adaptation to emergent risks such as avian influenza, and
- improved clarity and proportionality regarding land drainage restrictions.

A systematic review and updated management framework would ensure that conservation resources are focused on the areas of greatest ecological value, while enabling sustainable land use and development across the Ards Peninsula.

References

- Public Accounts Committee (2009). *Natural England's Role in Improving Sites of Special Scientific Interest*.
- Outer Ards ASSI Declaration (Department of the Environment, 2002).
- Ards & North Down Borough Council (2019). *Local Development Plan Position Paper: The Coast*.
- DAERA (various). *Guidance on ASSI Designation and Notifiable Operations*.
- British Trust for Ornithology (2021–2024). *AIV Impact Assessments on Seabirds*.
- RSPB (2021–2024). *Avian Influenza Response and Monitoring Reports*.

Annex D – Ards Borough Council Response to the Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026

CG 9594

8th February 2006

Mr Alan Hamilton
Sustainable Development Division
River House
48 High Street
Belfast
BT1 2AW

Dear Mr Hamilton

Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026

At a recent meeting members considered the above mentioned report and agreed to submit the following response:

General

The Council is a key player both strategically and operationally, being the custodian of over 90 miles of coastline. Additionally, it would wish to see at every level of the strategy a greater and more tangible link with the communities that made up Northern Ireland's coastline. It was only by demonstrably involving local people that strategies could have any real purpose.

(a) Overall Approach

The overall approach was broadly acceptable, but the Council would wish to raise concerns about the timescales and the relegation of communities and local agencies within the process. It was perhaps complacent to state (page 36) that in Years 8-20 "integration will now be complete and attention is now focused on monitoring". The Council would state that any strategy must constantly refresh itself and that communities and agencies alike should be open to change especially at macro / strategy level – otherwise the Strategy would become process driven, out of date and out of touch.

The Council would wish to state that it had concerns over the worrying statement on page 70, namely "that there are no specific resources set aside for the implementation of the objectives". Whilst it was recognized that the Strategy could be taken forward through a variety of enablers doing existing programmes of work, even in the context of vastly differing issues such as Climate Change and the Review of Public Administration, the Council would wish to see evidence that commitment and resources existed, using regional models in Britain and the Republic of Ireland, where budgets and outputs were clearer.

This notion of partnership (shared responsibility) would be a core value of this response which had been formulated taking cognizance of comments from Down District Council and Newry and Mourne City Council. Collectively, this area represented nearly 260 miles of coastline. No other elected entity existed to reflect the needs hopes and ambitions of those who depended on the coast for several key aspects of their lives.

In terms of vision underlying the document, the Council would wish to make the following points:

- The need to have an appropriate balance stressed at the vision stage between the impact of the precautionary principle and the development needs of a local community – management was not ALL about restriction, conservation and preservation, important as such issues are.

- Recognising the importance of non coastal areas, such as Ballygowan and Ballynahinch, in terms of access to the coast and the traffic impact resultant. The Coastal Zone definition should acknowledge these types of “feeder” settlements.
- It had concerns (as also determined by Down and Newry / Mourne local authorities) how committed other Government agencies could be (resources, statutory directives) to this process.

(b) Principles of ICZM

The Council would wish to make the following points:

- Support for the principles to be applied and support for the need for proper management and enforcement of sustainable coastal areas.
- Reiteration of the need for respecting in the Strategy that development was not an alien concept in terms of coastal zone management, and getting the balance right in the document accordingly.

(c) Key Organisations and Policies

Without wishing to respond negatively, the Council wished to state that this and many other local authorities were strategically (environmental health, enforcement, tourism and economic development, community planning) and operationally (some of the above plus facility management and building control) KEY ORGANISATIONS. Perhaps insularity and poor terms of reference had resulted in our exclusion, which was a staggering omission. It was of course understood that Councils and other local enabling bodies were mentioned in a number of other sections and appendices, but integration failed if it left out substantial players.

(d) Main Issues

The Council generally welcomed the content as stipulated particularly the emphases placed on community involvement, understated in many other elements of the document.

Additionally:

- It wished to see both an East-West and a Cross-Border focus stated in terms of practical co-operation and synergy. If resources were lacking, the tenor of many European Programmes such as Interreg could be levers for real work with real impact across and between communities.
- With reference to pages 25 and 30, the Council would wish to see recognition of the Coast as an economic driver and a vital, component part of so many settlements in Ards specifically and Northern Ireland generally, to include Portavogie, Portaferry, Kircubbin, Ballyhalbert, Strangford, Kilkeel, Cranfield – simply not enough recognition was made of the people who lived and worked around the coastlines, who had tried to make such living and working sustainable for generations, without a strategy managed by bureaucrats.
- On page 28 the Council noted the last paragraph referring to the need for transparent policies on approaches to Climate Change and Coastal Protection. It would wish to comment on the need for enforcement and consistency of action in this regard. Areas such as Strangford Lough, as government was well aware, were awash with paper policies but little policing.

(e) Objectives

The Council would comment as follows:

Page 34: the Council believed that the concept of sustainable communities where the coastline was concerned was of paramount importance. Demographic, economic and community declined were the norm for coastal settlements and this fact was ever more important when one considered the absence of resources stipulated on page 70.

Pages 41 and 42: Access to the Countryside issues – the Council had many asserted Rights of Way and had a considerable interest in the development of region wide coastal routes in the context of the County Down coast. Greater emphasis of the Council's tourism and community development roles could be made in a number of aims as stipulated (SC 2.2 and SC 2.3). Strategically, the revisiting and review of the Access to the Countryside legislation needed to be given a high priority if landowners and farmers were to be encouraged to co-operate with council in the development of this issue.

The Council would ask that the Wildfowl and Wetlands Trust was included in SC 1.1, 1.5 and 2.3 as a partner organisation, mindful of its major influence and long term development / environmental protection programme for Strangford Lough.

Page 51: the Council would again ask for its inclusion, together with where appropriate ((Econ 1.5) Regional Tourism Partnerships in the economic measures to include 1.5, 1.6 3.1 and 3.2. Councils and their partner agencies, both now and in the future, would play a direct – often lead – role in such matters and the absence of inclusion demonstrates the absence of knowledge.

Page 58: the Council believed that its exclusion was tantamount to excluding the community since environmental education, biodiversity, local community planning; waste awareness and more are all part of the brief of local authorities. Strangford Lough Information Network also to be included.

(f) Implementation

The Council would not wish to show support for any particular option, on the proviso that what structure was chosen was efficient, non-duplicatory, had over arching statutory powers, had elected member and specialist local government officer involvement and was grounded in the real needs of developing coastal communities.

The Council believed that Scottish and Republic of Ireland bodies such as the Loughs Agency and Bord Na Mara should have an explicit consultative association with the chosen delivery body.

The Council expresses concern that there is no strategy in place to deal with coastal erosion, and also that landowners are not permitted to undertake reinstatement or prevention works.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely

Derek McCallan

Director of Development

Annex E – Letter from Minister of Agriculture, Environment and Rural Affairs 6th June 2025

From the Office of the
Minister of Agriculture,
Environment and Rural Affairs

Mr John Kennedy
Sandycove Holiday Homes Ltd.
211 Whitechurch Rd,
Ballywalter,
BT22 2LA
[REDACTED]



Department of
Agriculture, Environment
and Rural Affairs

An Roinn

Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

Department of

Fairmin, Environment
an' Kintra Matthers

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Our Ref: COR-0391-2025
Date: 06 June 2025

Dear John

ARDS PENINSULA COASTAL EROSION GROUP

Thank you for your correspondence of 23rd May 2025 in follow up to the concerns you raised at the Ards Peninsula Coastal Erosion Group.

My Department does consider Caravan Holiday Parks to be tourism assets and a dataset named Caravaning, Camping and Glamping Sites in Northern Ireland is available on the Open Data NI portal. Thank you for highlighting this layer is not published on the Marine Map Viewer. My officials are also reviewing the issues you have identified with the outflow pipe at Ballyferries Holiday Park.

Chris Moore, DAERA Marine and Fisheries Division, will contact you when the Caravan layer is added to the Marine Map Viewer and if any further information is needed to confirm the outflow position.

Yours sincerely



ANDREW MUIR MLA
Minister of Agriculture, Environment and Rural Affairs

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

INVESTORS IN PEOPLE
We invest in people Standard

Annex F – Effect of publication of Strategic Planning Policy Statement (SPPS) Edition 2 (December 2025) on soundness and general conformity of Ards and North Down Borough Council – Draft Plan Strategy 2032

A. Summary of Objection

The Draft Plan Strategy (DPS) is not in general conformity with the Strategic Planning Policy Statement (SPPS) Edition 2 (December 2025) in respect of:

- **Topic 21: Renewable Energy, and**
- **Strategic Policy CC1: Climate Change Adaptation and Mitigation.**

This arises because the DPS continues to rely on the **SPPS (September 2015) renewable energy framework**, including reliance on PPS 18 as policy, and does not fully reflect the substantive changes introduced by SPPS Edition 2, namely:

1. The replacement of “Renewable Energy” with “**Renewable and Low Carbon Energy**”;
2. The **cancellation of PPS 18 as planning policy**;
3. The strengthened requirement that plan-makers **must give appropriate weight to climate targets and biodiversity**;
4. The explicit inclusion of **energy storage, electricity support technologies and enabling development for offshore renewables**.

As a result, the DPS is **unsound**, failing the tests of:

- **Soundness Test (a):** General conformity with regional policy;
- **Soundness Test (d):** Being based on a robust and credible evidence base.

B. Topic 21 – Renewable Energy

Soundness & General Conformity

Issue Identified

Topic 21 is framed entirely around the **SPPS 2015 renewable energy provisions**, despite those provisions having been **superseded** by **SPPS Edition 2 (December 2025)** prior to Plan adoption.

In particular, Topic 21:

- Refers to “renewable energy” rather than “**renewable and low carbon energy**”;
- Treats **PPS 18** as extant policy rather than cancelled policy;
- Does not explicitly reflect the SPPS Edition 2 requirement to **facilitate delivery** of renewable and low-carbon infrastructure;

- Lacks express support for **onshore enabling development for offshore renewable energy**.

This renders Topic 21 **out-of-date, misaligned and legally vulnerable**.

Required Modification – Topic 21 (Introductory Text)

Existing DPS Text (Topic 21 – introductory policy context)

“The SPPS seeks to facilitate the development of renewable energy proposals... Renewable energy sources include wind, solar, hydro, heat extraction and biomass...”

Suggested Replacement

“The Strategic Planning Policy Statement (SPPS), Edition 2 (December 2025), seeks to facilitate the development of renewable and low carbon energy proposals, recognising their critical role in addressing climate change, meeting statutory emissions targets and supporting energy security.

Renewable and low carbon energy sources include wind, solar, hydro, heat extraction, biomass, energy storage systems and electricity support technologies, and associated infrastructure necessary to support both onshore and offshore renewable energy development.”

Required Modification – Reference to PPS 18

Existing DPS Text (Topic 21 – policy context / footnotes)

“Planning policy for renewable energy is set out in PPS 18 Renewable Energy...”

Suggested Replacement

“Planning policy for renewable and low carbon energy is set out in the Strategic Planning Policy Statement (SPPS) Edition 2 (December 2025). PPS 18 Renewable Energy has been cancelled as policy, although its Best Practice Guidance remains a material consideration where relevant.”

Required Modification – Policy RE 1 / RE 2 (where applicable)

Where the DPS policies:

- simply “support” renewable energy; or
- frame renewable proposals as an exception to environmental constraints,

they should be strengthened to reflect the SPPS Edition 2 requirement to **actively facilitate delivery**.

Suggested Additional Policy Clause (insert into RE 1 / RE 2)

“In accordance with the SPPS Edition 2 (December 2025), the Council will give appropriate weight to climate change mitigation, renewable energy targets and biodiversity considerations and will actively facilitate the delivery of renewable and low carbon energy infrastructure, including associated grid, storage, electricity support technologies and enabling development for offshore renewable energy proposals.”

Soundness Conclusion – Topic 21

Without the above modifications, **Topic 21 is not in general conformity with regional policy** and therefore fails **Soundness Test (a)**.

The modifications proposed are **main modifications**, as they alter the policy basis, interpretation and weight to be applied to renewable and low-carbon energy proposals.

C. Strategic Policy CC1 – Climate Change Adaptation and Mitigation

Soundness & General Conformity

Issue Identified

Strategic Policy CC1 references renewable energy delivery through Topic 21 but does so using **pre-Edition 2 SPPS language** and does not reflect the strengthened obligations introduced by SPPS Edition 2.

In particular:

- CC1 does not clearly reflect that planning authorities must give appropriate weight to climate targets;
- CC1 relies on Topic 21, which itself is out of conformity with SPPS Edition 2.

This weakens CC1’s effectiveness and internal consistency.

Required Modification – Strategic Policy CC1 (Policy Wording)

Existing DPS Text (extract)

“The Council will support development that mitigates and adapts to climate change...”

Suggested Replacement

“The Council will give appropriate weight to climate change mitigation and adaptation in plan-making and decision-taking, having regard to statutory emissions targets and the need to facilitate the delivery of renewable and low carbon energy infrastructure, in accordance with the SPPS Edition 2 (December 2025).

Development proposals that contribute to renewable and low carbon energy generation, energy storage, electricity support infrastructure and associated enabling development will be supported, subject to appropriate environmental safeguards.”

Required Modification – CC1 Supporting Text (Cross-Reference)

Existing DPS Text

“Policy CC1 should be read in conjunction with Topic 21 Renewable Energy...”

Suggested Replacement

“Policy CC1 should be read in conjunction with Topic 21 Renewable and Low Carbon Energy, which has been updated to reflect the SPPS Edition 2 (December 2025).”

Soundness Conclusion – Strategic Policy CC1

In its current form, **Strategic Policy CC1 is internally inconsistent** and relies on an **out-of-date Topic 21**, undermining its effectiveness and credibility.

Modification is required to ensure:

- general conformity with the SPPS Edition 2; and
- consistency across the Draft Plan Strategy.

D. Overall Soundness Conclusion

Taken together:

- Topic 21 and Strategic Policy CC1 **do not reflect the current regional planning policy framework;**

- The DPS therefore fails **Soundness Test (a)** and is vulnerable to legal challenge if adopted without modification;
- The changes proposed are **necessary, proportionate and directly arising from SPPS Edition 2** and should be treated as **Main Modifications** requiring re-consultation if not already addressed.

Annex G – The Rural Needs Impact Assessment (RNIA)

Ards and North Down Borough Council Local Development Plan 2032 – Draft Plan Strategy

1. Purpose of this Annex

The Annex demonstrates that the RNIA, as prepared, **fails to comply with both the letter and the spirit of the Rural Needs Act (NI) 2016**, and that these shortcomings materially undermine the soundness of the Draft Plan Strategy as it relates to rural businesses, rural tourism, and rural employment.

2. Statutory Context: Identifying Rural Needs

Section 1(1) of the **Rural Needs Act (NI) 2016** places a legal duty on public authorities to have “*due regard to rural needs*” when developing policies, strategies and plans. The accompanying statutory guidance makes clear that this is not a desktop or abstract exercise but requires active identification and understanding of rural needs, including those of rural businesses and employees.

Paragraph 5.20 of **A Guide to the Rural Needs Act (NI) 2016 for Public Authorities** is explicit that public authorities should:

“...engage directly with individuals, businesses and representative bodies in rural areas where they may be affected by a policy, strategy or plan, in order to properly identify social and economic rural needs.”

The RNIA accompanying the Draft Plan Strategy does not demonstrate compliance with this requirement.

3. Failure to Engage with Sandycove Holiday Homes Ltd Staff and Customers

The RNIA asserts that rural needs have been identified through consultation and engagement. However:

- No staff of Sandycove Holiday Homes Ltd were surveyed or consulted, despite the business being a significant rural employer.
- No caravan owners or park users were surveyed, notwithstanding that these individuals:
 - Spend prolonged periods in rural areas;
 - Use rural services and infrastructure;
 - Support rural retail, hospitality and transport networks.

This represents a fundamental failure to identify the lived social and economic needs of people whose interaction with rural Ards Peninsula communities is both sustained and economically material.

4. Exclusion of Caravan Parks from the Tourism Evidence Base

Paragraph 7.8 of the Council's Tourism Position Paper explicitly confirms that **caravan sites were excluded from tourism accommodation statistics**. The RNIA nonetheless relies on these same datasets as evidence of rural tourism need.

This exclusion has three critical consequences:

1. **Systematic understatement of rural tourism activity**, particularly along the Ards Peninsula coastline.
2. **Misrepresentation of employment patterns**, as caravan parks are labour-intensive seasonal employers.
3. **Distorted assessment of accommodation need**, skewing policy towards hotels and settlement-based accommodation while marginalising established rural tourism models.

The RNIA fails to acknowledge, interrogate, or correct this acknowledged evidential gap.

5. Licensed Status of Caravan Parks Ignored

All caravan parks operated by Sandycove Holiday Homes Ltd — and all caravan parks within the Borough — **are licensed by Ards and North Down Borough Council**.

Accordingly:

The Council possesses direct, verifiable data on:

- Location;
- Scale;
- Seasonality;
- Operational characteristics;

The omission of caravan parks from the RNIA **cannot be justified on the basis of data unavailability**.

The failure to use Council-held licensing data to inform the RNIA is a clear procedural deficiency.

6. Public Transport Use by Caravan Owners Overlooked

The RNIA places significant emphasis on rural car dependency. This analysis fails to reflect the operational reality of Sandycove's parks, where:

- **Many caravan owners and visitors regularly use public transport**, including:
- Bus services linking coastal villages to Bangor and Newtownards;
- Walking and cycling connections between parks and village centres.

- Caravan parks function as semi-permanent seasonal communities, not transient car-based tourism nodes.

The RNIA therefore presents an incomplete and, in this respect, inaccurate picture of rural mobility needs.

7. Financial Investment by Caravan Owners Ignored

Caravan ownership represents a substantial private capital investment, often exceeding £40,000–£80,000 per unit, excluding annual site fees and local expenditure.

The RNIA:

- Makes **no reference** to this form of rural economic participation;
- Treats caravan tourism as incidental rather than embedded;
- Ignores the financial vulnerability of caravan owners to planning policy shifts.

This omission undermines any credible assessment of rural economic need.

8. Absence of Economic Need Analysis for Existing Businesses

While the RNIA repeatedly references “economic need,” it provides **no explanation of how economic need has been assessed for:**

- Long-established rural businesses;
- Multi-generational family enterprises;
- Businesses already embedded in the rural economy.

The statement that the Draft Plan Strategy “*seeks to provide more opportunities for existing businesses*” is unsupported by any evidence of engagement, survey work, or business-level analysis.

Without direct business engagement, this assertion is **policy rhetoric rather than evidence-based planning.**

9. Lack of Business Survey Evidence

The RNIA confirms reliance on:

- Published statistics;
- Position papers;
- Internal council documents.

However, it provides **no evidence that any businesses — tourism, agricultural, retail or otherwise — were surveyed** as part of the RNIA process.

This is directly contrary to the checklist in **Appendix 3 of the Rural Needs Act Guidance**, which emphasises proportionality and adequacy of detail in demonstrating “due regard”.

10. Conclusion: Implications for Soundness

While the assessment identifies Rural Tourism as a policy area to be primarily impacted, there is no reference to tourism stakeholder engagement or tourism-specific economic considerations.

Throughout the RNIA, impacts on rural businesses have been largely framed in terms of environmental benefit, with insufficient acknowledgement of the potential operational, planning and investment constraints that may arise for tourism enterprises. Very often the only specific rural business concern referenced relates to agricultural land availability, with no equivalent consideration of other rural land uses such as holiday and residential parks. This suggests that the economic realities of non-farming rural businesses have not been substantively examined within the assessment

Greater clarity on how rural tourism and caravan parks were considered would improve confidence that the Strategy has been developed with full regard to the Rural Needs Act.

Taken cumulatively, the deficiencies identified above demonstrate that the RNIA:

- Does not properly identify rural needs as required by statute;
- Relies on an acknowledgedly incomplete tourism evidence base;
- Excludes a major licensed rural tourism sector;
- Makes unsubstantiated claims regarding support for existing businesses.

As such, the RNIA **fails the legal and procedural tests of adequacy** and cannot reasonably be relied upon to demonstrate that the Draft Plan Strategy has had due regard to rural needs.

This failure has direct implications for the soundness of the LDP under:

- **Procedural compliance**, and
- **Justification**, given the reliance on incomplete and selective evidence.

Annex H – Northern Ireland Coastal Forum

An Economic, Community and Planning Governance Analysis

1. Overview of the Coastal Forum Aims and Work Programme

The Northern Ireland Coastal Forum is presented as a multi-agency partnership mechanism intended to improve coordination on coastal management issues within the current policy and legislative framework.

The December 2025 Detailed Work Programme identifies a broad suite of objectives, including:

- Development of a coastal management baseline (coastal change assessment, geomorphology, hydrodynamics, vulnerability mapping).
- Establishment of a coordinated monitoring programme and shared data infrastructure (e.g., Marine Map Viewer / observatory model).
- Preparation of a coastal planning “position paper” to assist planning authorities.
- Exploration of longer-term policy and institutional options (including potential establishment of a dedicated coastal management function).

Strategic Characterisation

The programme is strongly weighted toward technical evidence-building. It is comparatively less developed in relation to:

- Decision-making authority and democratic accountability
- Funding liabilities and economic trade-offs
- Compensation or adaptation pathways
- Rural economic transition planning

This creates a risk that the Forum functions primarily as a technical evidence generator without equivalent development of governance, economic, and community policy frameworks.

2. Work Programme Risks and Delivery Issues

2.1 Programme Scope vs Delivery Capacity

The programme spans:

- Advanced hydrodynamic modelling
- LiDAR and bathymetric data acquisition
- Vulnerability mapping

- Coastal defence inventory and inspection
- Rail asset resilience
- Council coastal works
- Policy development and legislative exploration

Such breadth introduces two risks:

1. **Prioritisation risk** – No clearly articulated “critical path” toward decision-ready outputs.
2. **Diffuse accountability** – Multiple agencies involved, but limited clarity regarding responsibility for final outcomes rather than intermediate activities.

2.2 Dependency on Incomplete Datasets

The work programme itself records repeated delays where progress depends on:

- Nearshore bathymetric LiDAR
- Hydrodynamic modelling
- Funding allocations not yet secured

Several items are marked as stalled or delayed due to resourcing constraints.

Policy implication: A persistent “evidence gap trap” may arise whereby restrictive planning decisions are justified on precautionary grounds while improved evidence remains unfunded or incomplete.

2.3 Funding Gaps

Certain programme components are costed at significant levels (in excess of £1m) with no confirmed funding stream.

Without ring-fenced investment in core datasets, the programme risks:

- Extended reliance on provisional or low-confidence vulnerability assessments
- Inconsistent policy application across councils
- Loss of stakeholder confidence

2.4 Status of Planning-Facing Outputs

The work programme includes development of a “position paper” to inform coastal planning decisions.

However, ambiguity remains regarding:

- Its formal planning status
- Whether it constitutes supplementary guidance
- Whether it will undergo consultation
- How it interacts with adopted LDP policy

If non-statutory outputs materially influence development management decisions, governance safeguards are required (consultation, transparency, equality and rural proofing considerations, version control).

3. Data Governance and Evidence Integrity

3.1 Baseline Study Warning on Data Reliability

The Baseline Study and Gap Analysis on Coastal Erosion Risk Management in Northern Ireland explicitly states that current vulnerability rankings are preliminary and should be approached with caution due to incomplete and inconsistent datasets.

It recommends:

- Comprehensive historic shoreline extraction
- Repeated LiDAR
- Wave measurement
- Structured monitoring programmes

While the Forum programme reflects many of these recommendations in principle, documented delays mean that the evidence base remains incomplete.

Key governance issue: There is no clearly published “evidence standard” defining when data are sufficiently robust to justify statutory land-use constraints.

3.2 Centralised Data Control

The proposed Marine Map Viewer / observatory model centralises data collation and presentation.

Without formalised peer review, dispute mechanisms, and clear data ownership protocols, risks include:

- Concentration of interpretive authority within a small technical cohort
 - Limited opportunity for independent challenge
 - Perception of institutional bias
-

4. Rural Needs and Community Policy Considerations

4.1 Absence of Explicit Rural Impact Framing

The Coastal Forum programme is operational rather than statutory, yet its outputs directly influence:

- Rural settlements
- Coastal SMEs
- Tourism enterprises
- Agricultural land
- Rural transport and infrastructure

There is no visible rural-proofing or structured Rural Needs Impact Assessment (RNIA) process applied to Forum outputs.

Given the concentration of potential impacts in rural coastal communities, this represents a policy gap.

4.2 Comparative Benchmark: LDP Rural Needs Impact Assessment

The Ards & North Down LDP Draft Plan Strategy includes a structured RNIA framework, defining rural areas, assessing differential impacts, and documenting consultation stages.

If Coastal Forum outputs are used to shape LDP coastal designations or policy interpretation, there should be clarity regarding:

- Whether those outputs were rural-proofed
 - How rural socio-economic impacts were assessed
 - Whether cumulative economic effects were considered
-

5. Membership, Governance and Conflict of Interest

5.1 Representation Balance

Ministerial meeting records indicate attendance by:

- Department for Infrastructure (DfI)
- Department of Agriculture, Environment and Rural Affairs (DAERA)
- Local councils including Ards & North Down
- National Trust
- Ulster University

The materials reviewed do not clearly demonstrate structured representation of:

- Coastal SMEs
- Tourism operators
- Marine economy businesses
- Property owners
- Affected rural resident groups

This creates a potential legitimacy imbalance if those most economically affected are not proportionately represented.

5.2 Conflict of Interest Risks

Where organisations:

- Own or manage coastal land
- Participate in publicly funded programmes
- Contribute to drafting planning-facing guidance

There should be formal safeguards including:

- Published declarations of interest
- Transparent commissioning arrangements
- Separation between evidence production and policy determination

Without such measures, there is a reputational and procedural risk, even where no improper conduct occurs.

5.3 Advisory Forum vs Quasi-Policy Authority

Ministerial engagement has included discussion of policy and legislative development, though legislative reform may not occur within the current mandate.

In the absence of statutory reform, there is a risk that non-statutory outputs evolve into de facto policy instruments without equivalent statutory safeguards.

6. Interaction with the Ards & North Down LDP 2032

6.1 Acknowledged Data Limitations in LDP Technical Supplement 11

The LDP Coastal Management Technical Supplement acknowledges:

- High-level nature of available data

- Difficulty formulating detailed coastal change policy
- Engagement with AFBI pilot vulnerability mapping

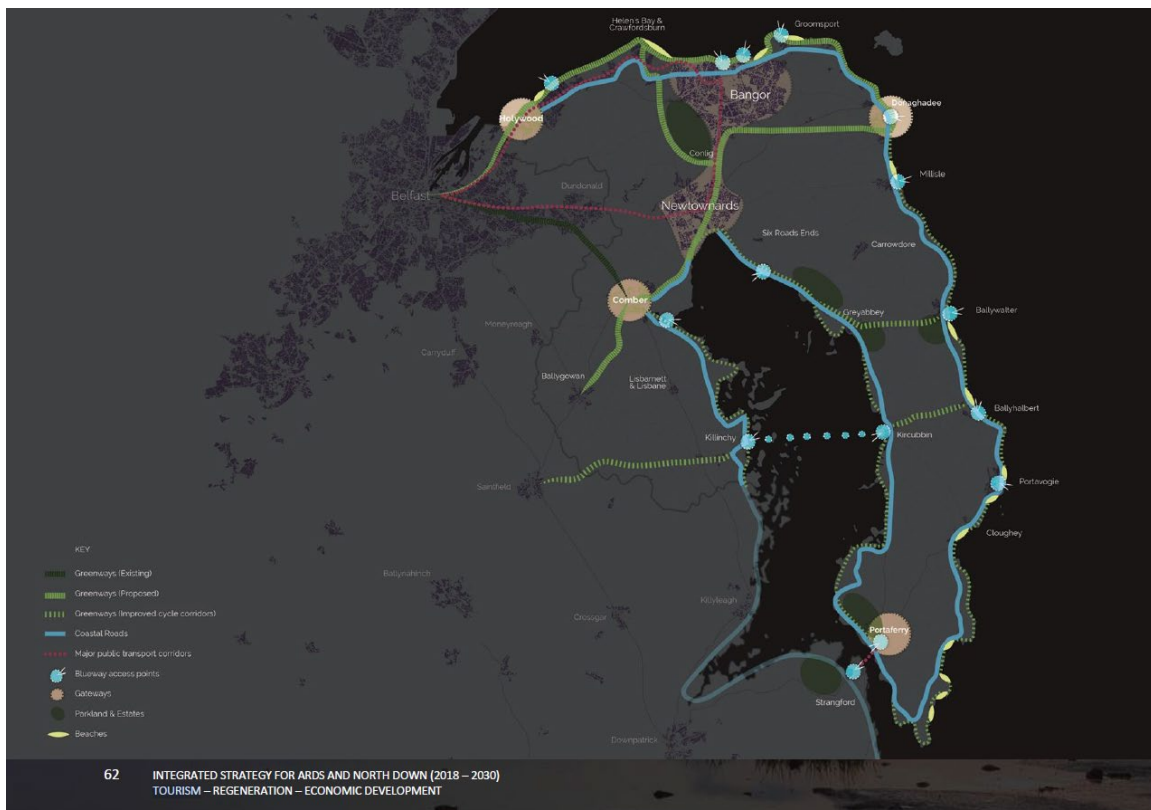
It describes the Undeveloped Coast Zone (UCZ) as a precautionary first step pending fuller understanding of coastal change.

Whilst the LDP Technical Supplement 11 refers to *The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030*. It should be noted that The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 contradicts what it proposed in the LDP with regard to UDZ1

The investment proposition will support further growth and development of existing sectors of strength within Ards and North Down (i.e. Agri-Food, Manufacturing and Tourism), as well as the development of critical mass within emerging sectors. In doing so, it will promote the development of businesses and initiatives that are aligned with the areas Blue Green credentials. Examples of such activity include, but are not limited to: food/ seafood production; marine and renewable energy; waste management and reduction; marine research, science and technology; coastal/marine tourism. Economic development activities supported by the strategy and the communication of the investment proposition will involve targeting of/ engagement with the following key audiences:

- **Indigenous business** – the strategy will:
 - Promote and reinforce the strengths of Ards and North Down as a base for existing and new local businesses;
 - Facilitate the development of strategic infrastructure (e.g. digital connectivity) and further development of effective support services to contribute to the development and growth of local businesses;
 - Establish structures and a new way of working that will deliver robust engagement with local businesses, to address sector specific issues and to support the development of local supply chains

The sustainable transport strategy map below (NB. location of the Six Road Ends is incorrect)



It should also be noted that the sustainable transport strategy for the Ards Peninsula, south of Donaghadee and Newtownards, relies on two roads (A2 and A20) which are regularly closed in Winter due to storm surges.

6 NEWS editor@ardschronicle.co.uk • Thursday 12th February 2026

Stormont hears of threats to vital A20 road

Lough road must be protected from storms warn MLAs

Violet Brown
v.brown@ardschronicle.co.uk

A LONG-term coastal resilience plan is needed to protect the main Newtownards to Portlaffery road during increasingly common storms, a local MLA has said.

During a debate in Stormont, Strangford MLA Michelle McBurney also called for more investment in vital coastal roads such as the A20 which she described as a 'vital lifeline' for isolated communities.

During the debate another Strangford MLA, Nellie Kinnear, also raised the issue of public safety, urging the earlier closure of the A20 when conditions are in danger of becoming unmanageable for motorists.

The debate came after the A20 had to be closed during Storm Chantal and Storm Brian which also caused damage to the infrastructure of the road.

Miss McBurney warned that recurring closures were no longer sustainable, warning that recent storms have highlighted the growing vulnerability of this key coastal route.

"Storms such as Chantal, and earlier events including Storm Brian, brought severe winds, tidal surges and flooding that left entire sections of the Portlaffery road impassable," she said. "Residents were cut off, vehicles were stranded and emergency services were forced to operate in extremely challenging and unpredictable conditions."

The 16 MP politician said the road's coastal alignment along Strangford Lough left it particularly exposed and added that time as Regional Development Minister made her actively aware of the history of storm damage, road undermining and sea wall failures along this route.

"While resurfacing and local improvement works are welcome, they can only go so far when the very foundations of the road are under constant threat from coastal erosion," Miss McBurney said.

She called on Infrastructure Minister Liz Kinnear to take a more strategic approach by ring-fencing funding specifically for sea defences to protect critical coastal roads. "Proactive investment would deliver better value and greater safety," she said.

She also urged the Department to develop a long-term coastal resilience strategy for the Ards peninsula, based on climate modelling, and to work closely with local communities, the coastal development in strengthening defences before the next major storm hits.

Miss McBurney minister has called for greater consideration for a road crossing between Portlaffery and Strangford as part of a broader future-proof transport network. She added that such a crossing could improve connectivity, support tourism and commerce, ease pressure on the A20 during closures, and enhance safety on a road that is widely recognised as an at-risk lifeline.

Calling for a more coordinated response to future extreme weather events, she emphasising she described the A20 Portlaffery Road as a 'lifeline' for the people of the Ards peninsula.

"This vital route is uniquely vulnerable when storms coincide with high tides," she said. "Thousands rely on it daily, from commuters to schoolchildren, to carers and local businesses."

The Ards MLA called for a proactive system to be put in place to ensure the A20 was closed before conditions became dangerous, better communication between the relevant agencies, including the PSNI and schools, and contingency plans for supporting the isolated peninsula route as a safe alternative.

"This is an issue of not just infrastructure, but public safety, community confidence, and the basic expectation that government agencies work together when lives are at risk. The people of the Ards peninsula deserve better than uncertainty and jury-podding when their safety is on the line," she concluded.



Storm damage to a key road near Portlaffery. 10th Feb 2026



Thousands rely on it daily, from commuters to schoolchildren, to carers and local businesses

Waves crashing over the Portlaffery Road during a recent storm. 05-11-24



Trinity Presbyterian Church, Greyabbey

Alice Smith, Heather MacArthur, Diane MacArthur, Paula Conroy and Barbara Aye Brown Trinity Presbyterian Church, Greyabbey, taking part in a sponsored indoor cycle. Proceeds are going to help fund a trip to Abney Nursery and Primary School in Uganda this March. 08-12-24

The Trinity 2 Abney 2026 team consisted of Trinity Presbyterian Church in Greyabbey who recently organised a sponsored indoor cycle. Funds raised will go towards a trip to Abney Nursery and Primary School in Uganda this March. 08-12-24

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6.2 Policy Soundness Implications

If the LDP relies upon precautionary designations justified by incomplete datasets, while future evidence is anticipated through the Coastal Forum programme, this raises Independent Examination considerations:

- Is the evidence base sufficiently robust at adoption stage?
- Is reliance on future data compatible with soundness tests?
- Has rural economic impact been adequately assessed?

6.3 Institutional Overlap

Ards & North Down Borough Council participates in Coastal Forum structures while simultaneously adopting coastal planning policy.

This overlap is not improper, but requires:

- Clear audit trails of evidence use
 - Transparency regarding how Forum outputs informed LDP drafting
 - Assurance of equal access to evidence by all consultees
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7. Baseline Study Gaps Not Fully Addressed in Work Programme

The Baseline Study highlights several structural gaps:

7.1 Absence of a Formal NI-Wide Decision Framework

While pilot projects are referenced, there is no clearly articulated:

- Shoreline management typology
 - National funding liability framework
 - Compensation/adaptation mechanism
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7.2 Inventory of Public and Private Coastal Defences

The Study emphasises need for comprehensive inventory and condition assessment of all defences.

The work programme references inspection and maintenance but does not clearly evidence a single authoritative, publicly accessible register.

7.3 Skills and Capacity Across Councils

Limited in-house expertise was identified as a structural issue.

While education and awareness measures are referenced, there is limited clarity regarding:

- Dedicated technical posts
 - Shared services arrangements
 - Standardised interpretation protocols for planning decisions
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7.4 Structured Stakeholder Engagement

Although stakeholder engagement is referenced within project strands, there is no visible standing, balanced coastal stakeholder panel with transparent reporting and representation safeguards.

Policy Recommendations

1. Publish a formal protocol defining the planning status and evidential weight of Coastal Forum outputs.
 2. Introduce a transparent conflict-of-interest and membership governance framework.
 3. Undertake a Coastal Rural & Community Impact Statement for major outputs.
 4. Define and publish a minimum evidence threshold for coastal zoning decisions.
 5. Ring-fence funding for critical datasets to prevent prolonged precautionary constraint.
 6. Add an economic adaptation workstream addressing rural tourism, SMEs, and coastal livelihoods.
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Sources

1. Northern Ireland Coastal Forum – Coastal Forum Information (ArcGIS Experience platform).
2. Detailed Coastal Forum Work Programme – December 2025.
3. Baseline Study and Gap Analysis of Coastal Erosion Risk Management in Northern Ireland (2019).
4. Note of Ministerial Meeting – NI Coastal Forum – 19 November 2025.
5. Ards & North Down Borough Council – Coastal Management Technical Supplement 11 (Draft Plan Strategy).
6. Ards & North Down Borough Council – Rural Needs Impact Assessment – Draft Plan Strategy.
7. Legislative and Policy Response to the Risk of Coastal Erosion and Flooding in the UK and Ireland.