

Local Development Plan (LDP) - Position  
Paper

## **The Coast**



**Ards and  
North Down**  
Borough Council

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## Executive Summary

This Position Paper provides the Council with an overview of baseline evidence in relation to the coast of Ards and North Down. It examines the future land use needs of coastal development in the Ards and North Down District Council Area, highlights the interaction between marine and terrestrial planning and considers the associated social, economic and environmental implications of climate change and the need for coastal protection. The paper should assist in identifying the key future direction for the Local Development Plan (LDP) up to 2030, by allowing members to consider the key issues in relation to the effective management of our coastline.

It is important to stress that in compiling the Position Paper the best information available has been used however it may need revised in light of the release of any new data such as the Marine Plan for Northern Ireland which is currently under preparation.

The paper will provide a foundation of evidence to bring forward proposals in the Preferred Options Paper (POP) and also form a starting point with the views of members generated as part of the engagement event. The POP is the earliest stage of plan preparation and will form the basis for consulting with the public and stakeholders on a range of options for dealing with key issues in the Borough. It will also allow members commence consideration of how policy for the effective management of coastal development can be formulated within the context of the Regional Development Strategy (RDS 2035) and the Strategic Planning Policy Statement (SPPS.)

Any future decision making will need to be made within the context of a Sustainability Appraisal under the provision of Planning (Northern Ireland) Act 2011. This paper is therefore intended to generate members' ideas on how planning can best manage, protect and develop our coastline.

## Introduction

- 1.1 The aim of this paper is to provide baseline evidence with respect to the coast in order to inform members and enable meaningful participation in the LDP topic-based workshops.
- 1.2 The Ards and North Down Corporate Plan 2015-2019 highlights the significance of the coastline in our Borough. At a length of 115 miles, it is one of the longest in Northern Ireland, consisting of Belfast Lough to the north, The Irish Sea to the east and Strangford Lough with its associated islands forming the internal coastline with the Ards Peninsula. These areas provide nationally and internationally significant coastal habitats for birds and wildlife, including mudflats, coastal saltmarsh, sandy beaches, boulder and rocky shore and are protected by numerous nature conservation designations. A significant proportion of the Borough population is located in 17 coastal settlements and the coast also represents a valuable recreational and tourism resource for activities such as walking, sailing, watersports and fishing.
- 1.3 Our coastline is under pressure from various types of development including residential schemes, coastal industry and recreation. This paper will allow members to consider these issues further and the ways that the LDP can assist in dealing with them.

## Regional Planning Policy Context

- 2.1 The regional policy context is provided by the Regional Development Strategy (RDS) 2035 and the Strategic Planning Policy Statement (SPPS). A summary of these documents as they relate to plan making and coastal development is provided in the following paragraphs.

## Regional Development Strategy 2035 (RDS)

- 2.2 The RDS 2035 provides an overarching strategic framework to facilitate and guide the future distribution of development throughout Northern Ireland, including the marine area. It recognises that policies for physical development have far reaching economic, social and environmental implications which need to be balanced if sustainable growth and social cohesion are to be achieved.
- 2.3 The RDS states that the quality of the environment can make a significant contribution towards achieving a better quality of life. It stresses that we should minimise development in areas at risk from flooding from rivers, the sea and surface water<sup>1</sup>. Whilst it recognises that flooding is a natural phenomenon which cannot be entirely prevented, it also suggests that it is frequently exacerbated by human activity. The RDS therefore suggests a precautionary approach to development in areas of flood risk informed by the latest up-to-date flood risk information.
- 2.4 Furthermore, the RDS promotes the protection and extension of ecosystems and habitats that can reduce or buffer the effects of climate change. For example, coastal salt marsh may provide some protection against the effects of sea level rise.
- 2.5 The RDS emphasises that our environment is one of Northern Ireland's most important assets<sup>2</sup>. It specifically references the need to protect, enhance and manage the coast. Coastal areas need to be protected from coastal squeeze and the loss of distinctive habitats and can be utilised to aid in our adaptation to climate change. Detailed policy and spatial guidance contained within the UK Marine Policy Statement (2011) and the Marine Plan for Northern Ireland (under preparation) should assist in achieving these aims and this will be complemented by work to advance integrated coastal zone management.

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<sup>1</sup> Regional Guidance (RG 9) 'Reduce our carbon footprint whilst improving air quality' RDS 2035

<sup>2</sup> RG 11 'Conserve, protect and where possible enhance our built heritage' RDS 2035

- 2.6 The Spatial Framework Guidance section of the RDS (Belfast Metropolitan Urban Area) highlights that Bangor has future development potential centring on its modern marina and creating activities around the promenade area. SFG-5 also recognises the need to protect areas of high scenic value within the Belfast Metropolitan Area such as undeveloped coastline and Belfast Lough as a means to secure benefits to the economy and society.

### [Strategic Planning Policy Statement \(SPPS\)](#)

#### **Coastal Development**

- 2.7 The Strategic Planning Policy Statement (SPPS), was published in September 2015. The policy for 'Coastal Development' is consistent with the RDS in that its aim is to protect the undeveloped coast and to support the sensitive enhancement and regeneration of the developed coast largely within coastal settlements. (The SPPS defines the developed coast as including existing settlements and major developments such as ports, isolated industrial units and power stations.)
- 2.8 The SPPS also re-iterates the importance of the coastline in terms of its landscape value, nature conservation importance and associated national and European designations.
- 2.9 The SPPS identifies the following strategic objectives for coastal development:
- Conserve the natural character and landscape of the undeveloped coast and to protect it from excessive, inappropriate or obtrusive development; and
  - Facilitate appropriate development in coastal settlements and other parts of the developed coastline (subject to all other planning policies) that contribute to a sustainable economy and which is sensitive to its coastal location.
- 2.10 The SPPS outlines the following strategic policy that be taken into account in the preparation of the LDP and determination of planning applications:

- The undeveloped coast will rarely be an appropriate location for new development. Where new development requires a coastal location, it must normally be directed into coastal settlements and other parts of the developed coast;
- Development should only be permitted on the undeveloped coast where the proposal is of such national or regional importance as to outweigh any potential detrimental impact on the coastal environment and where there is no feasible alternative site within an existing urban area in the locality;
- Within the developed coast, areas of amenity value and areas or features designated for their importance to archaeological, built or natural heritage, should be protected from inappropriate development;
- Within the developed coast there will be a presumption in favour of development that promotes the enhancement and regeneration of urban waterfronts;
- In considering development proposals within the developed or undeveloped coast attention must be paid to the retention of existing public accesses and coastal walkways. Development which would result in the closure of existing access points or the severing of routes will normally only be acceptable where a suitable alternative is provided;
- Proposals to extend access to the coastline or for the provision of associated facilities such as pathways or picnic areas, should not impact adversely on the nature conservation, archaeological / built heritage, geological or landscape value of the area;
- Development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability.

2.11 The SPPS emphasises how the LDP and the Marine Plan for Northern Ireland need to be compatible with each other. The need for conformity stems from the fact that the terrestrial planning system and the marine planning and licencing system are legally and functionally separate but overlap in a spatial sense. Section 8 of the Marine Act (NI) states that all planning decisions that affect or might affect the UK marine area must do so in accordance with the



Marine Plan (once adopted.) This places an onus upon planning officials to work closely with the relevant Marine Department to ensure that our LDP and the forthcoming Marine Plan are complementary.

- 2.12 The SPPS further states that coastal development needs to be integrated into the preparation of the LDP. The LDP should identify areas within coastal settlements or other parts of the undeveloped coast where opportunities exist for enhancement or regeneration of urban waterfronts, through new developments.
- 2.13 Some developments will require a coastal location such as ports, marinas and recreational projects. The LDP should, where appropriate, identify land to be zoned for such uses within coastal settlements.
- 2.14 The LDP will also identify coastal areas of high amenity or landscape value, nature conservation interest or historic/archaeological importance where development should be restricted. Areas of coast known to be at risk from flooding, coastal erosion or land instability will also be highlighted to ensure that new development is not permitted in these locations.

### **Flood Risk**

- 2.15 The SPPS confirms that development can exacerbate flooding and identifies the important role that the planning system has in managing development in a way that reduces the risks and impacts of flooding. From a planning perspective, the relevant regional strategic objectives for the management of flood risk are to:
- Prevent inappropriate new development in areas known to be at risk of flooding or that may increase the risk of flooding elsewhere;
  - Adopt a precautionary approach to the identification of land for development through the LDP process, in those areas susceptible to flooding where there is a lack of precise information on present day flood risk or future uncertainties.

## Extant Development Plans

[North Down and Ards Area Plan 1984-1995 \(NDAAP\), Belfast Urban Area Plan, draft Belfast Metropolitan Area Plan 2015 \(dBMAP\) and Belfast Metropolitan Area Plan 2015 \(BMAP\)](#)

- 3.1 It should be noted that BMAP was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area with draft BMAP remaining a material consideration. These plans remain extant until replaced by the new Local Development Plan (LDP) for the Borough. The existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options, draft BMAP states the following with respect to Ards and North Down:
- 3.2 The North Down coastline forms a linear shoreline strip extending from the edge of Belfast, at the head of Belfast Lough, to Orlock Point at its mouth. It is a strip of land with a gently undulating topography which supports a patchwork of pasture, mature deciduous woodland and dense urban development. The historical presence of many estates has created a local landscape of large fields, stone walls and woodland. A series of narrow wooded glens wind down the steeper slopes towards the Lough Shore. Views are generally short due to the well-wooded character of the coast but the exposed areas have an open rocky edge with patches of low growing gorse and scrub, providing opportunities for long panoramas across the Lough.
- 3.3 The North Down Coast is designated as part of the Belfast Metropolitan Area Coastal Area in draft BMAP and this provides additional protection its unique landscape value and nature conservation interest, especially from intense recreational and tourism pressures.

- 3.4 The coastal urban centres of Holywood, Helen’s Bay and Bangor are linked by a good communication network comprising the main A2 dual carriageway and the Belfast to Bangor railway line, as well as many minor roads and the North Down coastal path. The provision of footpaths, parking and picnic sites provides recreational opportunities along the coast.



**Photo 1:** The North Down coastal path is popular with both locals and tourists, walkers and cyclists. Recent improvements to steeper sections of the path have made it more wheelchair and buggy accessible.

Source: Ards and North Down Borough Council

- 3.5 There are 5 coastal settlements within the North Down District: (refer to map on page 11)
- Bangor
  - Holywood
  - Groomsport
  - Helen’s Bay; and

- Orlock

3.6 Policy COU4 of draft BMAP designates the section of Bangor's coast that falls within the settlement limit boundary as an Urban Waterfront, with aims to enhance and regenerate the waterfront whilst enhancing its environmental quality, retain and further develop public access to the coast, protect existing open space, enhance tourism potential and protect important heritage features.



**Photo 2:** Pickie funpark at Bangor Marina falls within the BMA Urban Waterfront.

Source: Ards and North Down Borough Council

#### [Ards and Down Area Plan 2015 \(ADAP\)](#)

3.7 The ADAP is a development plan prepared under the provisions of Part 3 of the Planning (NI) Order 1991 by the Department of the Environment (DOE). The Plan covers the Borough Council areas of Down and Ards.

- 3.8 Volume 2 of the A&DP sets out policies on the former Ards District. These policies have been developed in the context of the Plan Strategy, Policy Framework and Countryside Proposals contained within Volume 1 of the Plan.
- 3.9 The eastern edge of the Ards district is the Irish Sea and the villages and towns in the Borough are mostly situated along the sea coast and the shores of Strangford Lough. The area contains a rich diversity of terrain, landscapes, habitats and settlement. The coastal areas are a valuable resource for their landscape qualities, earth-science features and as wildlife habitats. The internal shoreline of the Ards Borough is formed with Strangford Lough – a shallow island-studded arm of the Irish Sea.



**Photo 3:** The Lough stretches some 25 kilometres from a wide expanse of sand and mud flats between Comber and Newtownards, through swift tidal waters at the narrows between Portaferry and Strangford and then southwards where it meets the open sea at Ballyquintin Point.

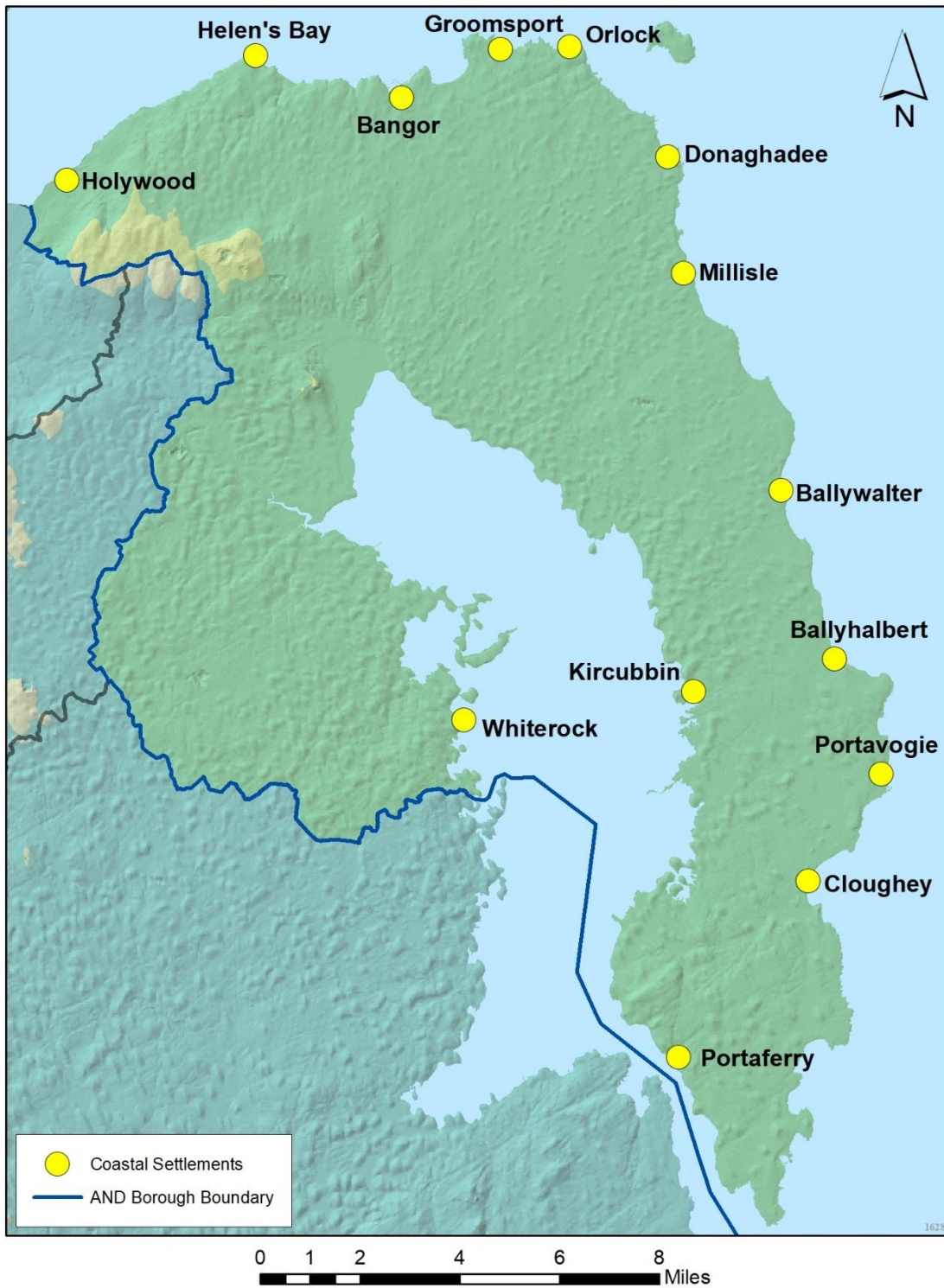
Source: Ards and North Down Borough Council

3.10 There are 9 coastal settlements within the Ards District: (See map on following page:

- Donaghadee
- Ballyhalbert
- Ballywalter
- Portaferry
- Portavogie
- Whiterock
- Kircubbin

3.11 The Plan does not contain any specific policies relating to its coastal region and refers to operational planning policies contained within Planning Policy Statement 2 (Planning and Nature Conservation.) It also recognises that the Ards coastline is protected by a number of national and European nature conservation designations (which are discussed in the following section).





**Map 1: Ards and North Down Borough Coastal Settlements.**

## Council Plans and Strategies

### [Ards and North Down Corporate Plan 2015-2019](#)

- 4.1 Under the strategic priority heading **PLACE**, the Council's Corporate Plan aims to 'invest in and promote the borough's rich cultural heritage and environment,' and to 'enhance our towns villages and coastlines.' These themes have direct relevance to our coastal environment.

### [The Big Plan for Ards and North Down 2017-2032](#)

- 4.2 The promotion and protection of our coastline also supports the Community Plan (The Big Plan for Ards and North Down 2017-2032) aspiration of 'All people in Ards and North Down feel pride from having access to a well-managed sustainable environment' (Outcome 5).

## Coastal Designations

- 5.1 Both the ADAP and draft BMAP recognise that the coastline of the Ards and North Down Districts is unique and contains a number of nationally and internationally significant species of flora and fauna and their habitats. These are protected via a framework of National, European and International environmental designations, the extent of which is identified in both Plans.

### [International Designations: Ramsar Sites, Special Protection Areas and Special Areas of Conservation](#)

- 5.2 The Convention on Wetlands of International Importance was adopted at a meeting of countries held at Ramsar, Iran in 1971. The delegate countries were concerned with wetland and waterfowl conservation and the objectives were to stem the progressive encroachment on and loss of wetlands and to encourage their wise use.

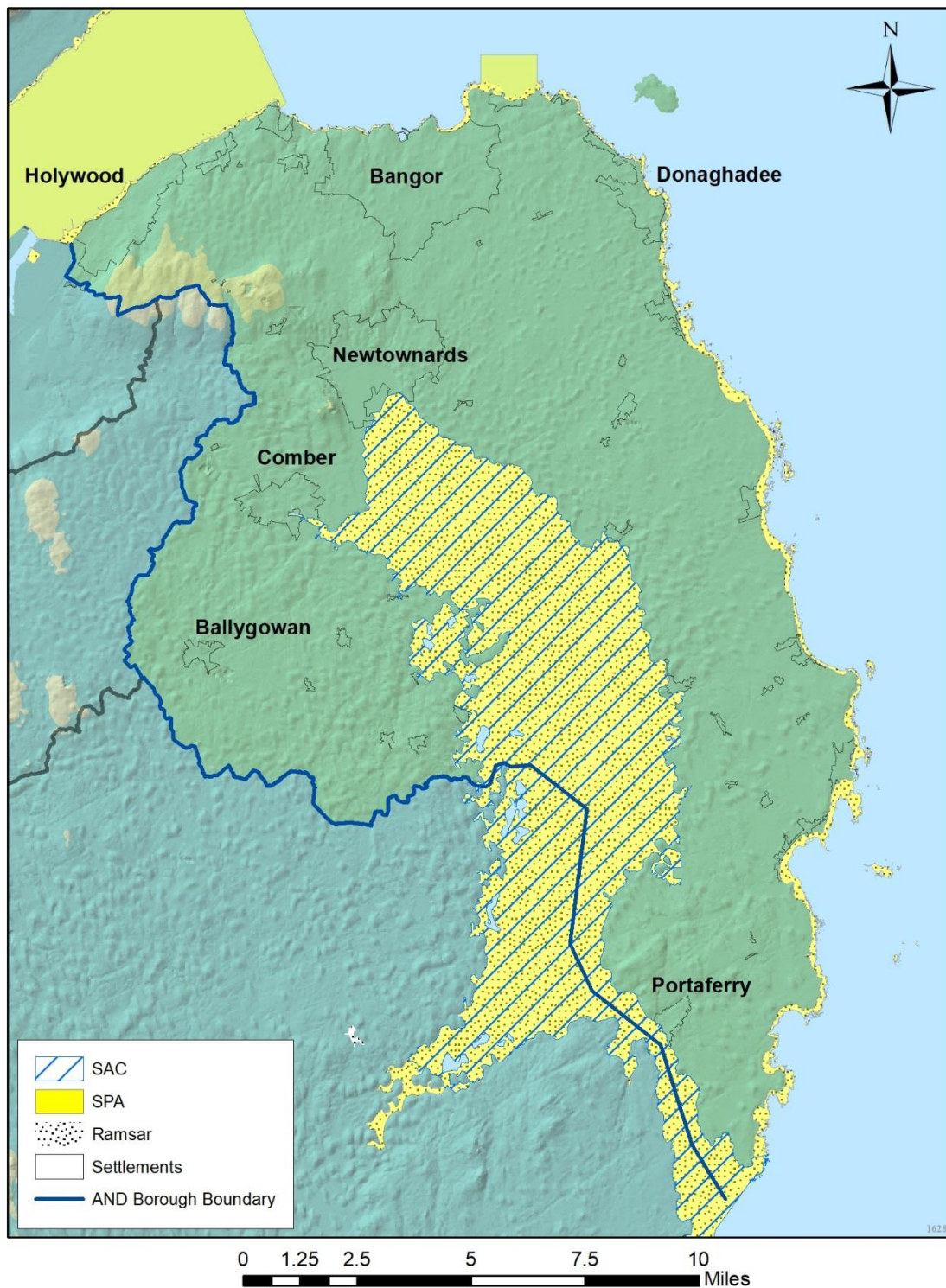


5.3 Special Protection Areas (SPAs) are designated under the EC Directive on the Conservation of Wild Birds (The Birds Directive.) All European Community member states are required to identify and designate all internationally important areas for breeding, over wintering and migrating birds.

5.4 Special Areas of Conservation (SPAs) are designated under the Habitats Directive. They consist of a system of strict protection for a list of species whose resting and breeding places must be protected to secure their survival. The following Ramsar/SPA/SAC sites fall within the Borough:

- Strangford Lough SPA/SAC and Ramsar Site: This is Northern Ireland's most important coastal site for wintering waterfowl and also for breeding terns. The site supports a variety of wetland features such as areas of fringing saltmarsh and freshwater habitats containing a diverse assemblage of wetland plant species. The area also hosts an internationally renowned variety of marine and intertidal habitats. There is no comparable area in Northern Ireland with such a range of either habitats or species.
- Outer Ards: The Outer Ards Ramsar/SPA site extends from grey Point in Helen's Bay to Ballyquintin Point in Portaferry. The site mainly encompasses intertidal areas and includes sand and mud dominated shores, cobble and boulder beaches and rocky shores. The principal interests are breeding colonies of Arctic Tern and Manx Shearwater.
- Belfast Lough: The A&ND section of the Belfast Lough Ramsar/SPA site extends from the western district boundary to Helen's Bay. The site regularly supports internationally important numbers of redshank in winter. The site also regularly supports nationally important numbers of shelduck, oystercatcher, purple sandpiper, dunlin, black-tailed godwit, bar-tailed godwit, curlew and turnstone. Belfast Lough as a whole is also used by several other waterfowl species including great crested grebe, scaup, eider, goldeneye and red-breasted merganser.

5.5 The planning policy relating to proposed developments within or adjacent to the above designated sites is contained in Policy NH1 of Planning Policy Statement 2: Natural Heritage. The extent of the international nature conservation designations is shown on the map on the following page.



**Map 2: International Nature Conservation Designations in Ards and North Down.**

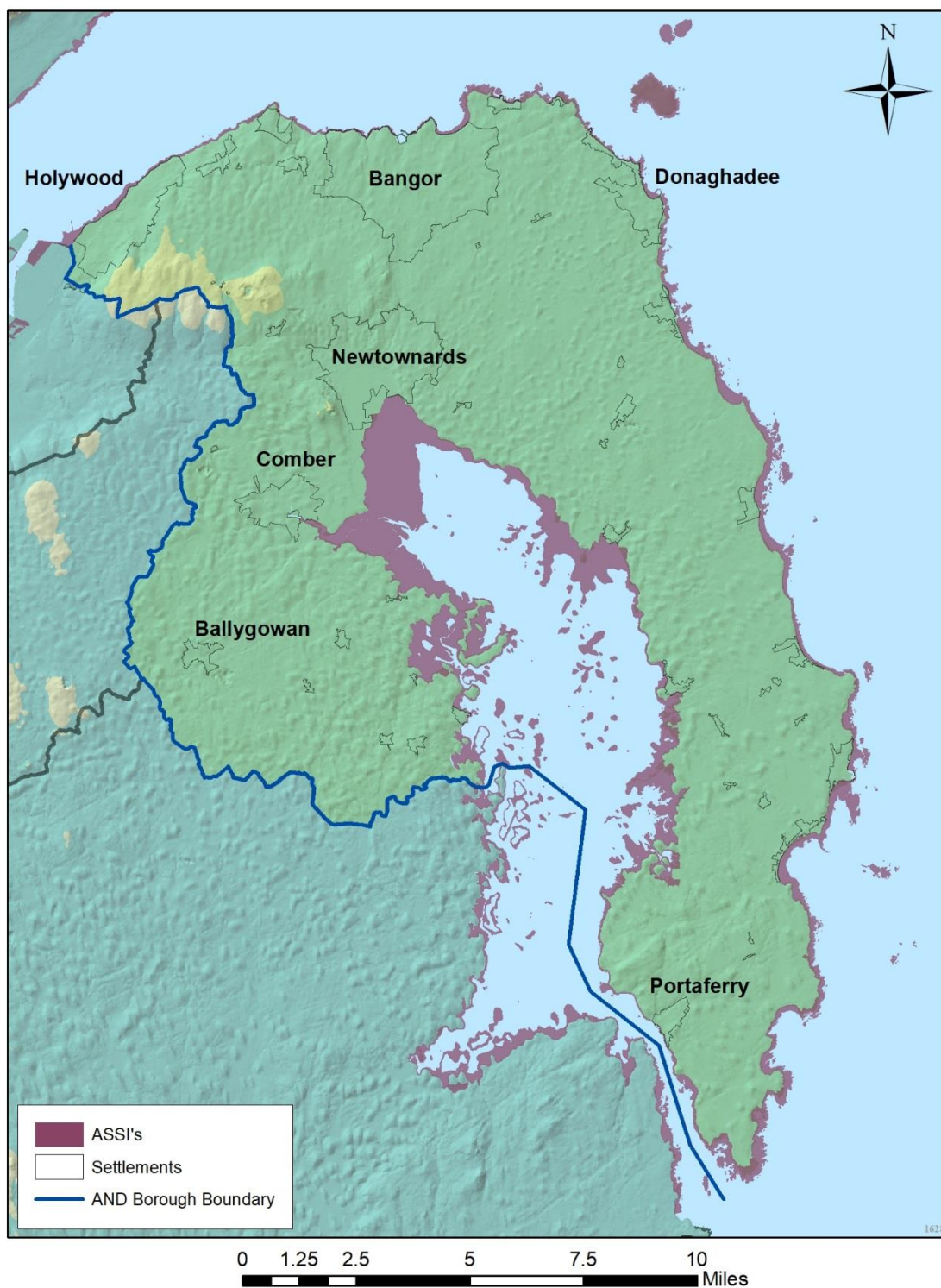
## National Designations: Areas of Special Scientific Interest

5.6 Areas of Special Scientific Interest (ASSIs) are areas of land that have been identified by scientific survey as being of the highest degree of conservation value by reason of their flora, fauna and geological or physiographical features. They have a well-defined boundary and are generally in private ownership. The underlying philosophy is to achieve conservation by co-operation with landowners. The following table identifies the coastal ASSIs that fall within the Borough:

<b>Ballymacormick Point (Bangor)</b>	Ballymacormick Point is a rocky headland with a series of small sandy bays and mudflats. The area contains an unusually wide range of coastal vegetation communities, including saltmarsh and maritime grassland. It contains several plant species with a restricted distribution in Northern Ireland, including Saltmarsh Flat Sedge.
<b>Ballyquintin Point (Portaferry)</b>	Ballyquintin exhibits an exceptionally well developed raised cobble beach with associated ridges and bars together with a range of contemporary coastal landforms. The site displays an intact transition from maritime through to inland vegetation communities
<b>Copeland Islands (Donaghadee)</b>	Copeland Islands ASSI encompasses all the isles. The islands are important sites for breeding seabirds and waders, in addition to their coastal plant communities and geological features. Communities influenced by the sea are found around the shore with maritime cliff vegetation and pockets of salt marsh also present. The centre of the island is occupied by semi-improved wet grassland with frequent areas of marsh.
<b>Outer Belfast Lough (Western district boundary – Helen’s Bay)</b>	Outer Belfast Lough is a structurally defined feature, possibly making the continuation of the major Southern Uplands Fault from Scotland to Ireland. Geological features include spilitic lavas, black shales and greywackes. The habitat range includes open mud flats, boulder and rock shore, extensive mussel beds and a narrow shoreline strip of semi-natural vegetation including small, isolated pockets of beach-head saltmarsh.
<b>Outer Ards (Helen’s Bay – Ballyquintin Point)</b>	Internationally important rock series. The intertidal area exhibits the classic algal zonation. The lower shore is particularly rich in red algae, which form a dense understorey beneath the wracks and kelps. A number of notable maritime

	vegetation communities occur. Seventeen rare plant species have been recorded. Internationally significant populations of Light Bellied Brent Geese, Turnstone and Ringed Plover are supported by the area, as are nationally important populations of 11 other species of bird.
<b>Strangford Lough</b>	Extensive mudflats, sandflats, saltmarsh and intertidal shore. A unique and exceptionally important site for intertidal flora and fauna.





**Map 3: National Coastal Designations in Ards and North Down.**



**Photo 4:** The Copeland Islands hosts internationally significant bird populations.  
Source: Ards and North Down Borough Council.

#### [Local Designations: Local Landscape Policy Areas](#)

- 5.7 Local Landscape Policy Areas (LLPAs) are defined as areas adjoining settlements which are considered to be of greatest amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development. A number of extant LLPAs are located wholly or in part along the coastline and their coastal characteristics such as headlands, raised beaches and ocean views are identified as part of the reason they are worthy of designation. Both the ADAP and draft BMAP have designated a number of LLPAs and a list of these can be found in Appendix A on page 36.

#### [Marine Conservation Zones](#)

- 5.8 The Marine Act (Northern Ireland) 2013 includes provisions for establishing Marine Conservation Zones (MCZs). MCZs may be designated for various

purposes including the conservation of marine species and habitats, taking the economic, cultural and social consequences of doing so into account.

- 5.9 The Act also allows the Department for Agriculture, Environment and Rural Affairs (DAERA) to protect MCZs from damage by unregulated activities including anchoring, kite surfing and jet skiing and it an offence to intentionally or recklessly destroy or damage a protected feature of an MCZ or to contravene a byelaw.
- 5.10 Strangford Lough was designated as Northern Ireland's first MCZ following the introduction of the Marine Act in 2013. A consultation on four further proposed MCZs (Rathlin, Waterfoot, Outer Belfast Lough and Carlingford Lough) closed on 11 March 2016. All four sites were formally designated in December 2016. The Outer Belfast Lough MCZ is of relevance to our Borough.
- 5.11 The Outer Belfast Lough MCZ is an exposed area located within Northern Ireland's busiest sea lough. The Lough encompasses a wide range of habitats such as sub-tidal sand and mixed sediments, sediment dominated bays and rocky shores. The MCZ has been designated due to the presence of a well-established and dense population of ocean quahog that lives buried in the sub littoral sand habitat.

## **Coastal Infrastructure and economy in Ards and North Down**

- 6.1 As referred to previously, the majority of Ards and North Down's settlements have a coastal location. Within these urban areas, the shoreline exhibits a range of character and uses from commercial ports with processing facilities, to tourist resorts with well-maintained public recreation areas.
- [Portavogie](#)
- 6.2 Portavogie Harbour is an important and highly active commercial fishing port, the only one of its kind in the Borough and the second largest in the whole of Northern Ireland (after Kilkeel.) The modern harbour houses a large fishing



fleet catching mainly prawns and herrings and several food processing plants are located nearby at Princess Anne Road. Produce is transferred on to locations within and beyond our Borough at the daily fish market, located on the eastern pier.

- 6.3 On 25 January 2017, the (then) Fisheries Minister Michelle McIlveen unveiled plans to upgrade the fish market building through the provision of improved and extended chill room facilities with secure access and modern washroom facilities. To date, a planning application has not been submitted for this development.



**Photo 5:**  
Portavogie  
Harbour.  
Source: Ards and  
North Down  
Borough Council

#### Portaferry

- 6.4 The Portaferry to Strangford ferry service crosses Strangford Lough at its narrow point, close to where Strangford Lough adjoins the Irish Sea. Ferries depart from each terminal every 30 minutes and convey about 500,000 passengers per annum between the two destinations. Transport NI (an executive agency of the Department for Infrastructure) operates the service using two vessels. The alternative road journey measures 47 miles, whilst the ferry makes the 0.6 nautical mile crossing (0.69 miles) in 8 minutes.



**Map 4: Map of Strangford ferry route.**

Source: Ards and North Down Borough Council

6.5 This transport hub obviously makes a key contribution to the economy of the area and members may wish to consider recognition of this through an appropriate zoning in the LDP.

#### Bangor

6.6 Bangor Marina is Northern Ireland's largest marina, offering 560 sheltered and secure pontoon berths. The marina is staffed 24 hours a day and offers various facilities such as toilets, showers, fuelling, water, electricity, boatyard service and free car parking.

6.7 In addition to commercial berthing facilities, Bangor seafront also includes other uses that are complementary to the maritime industry. HM Coastguard Marine Rescue Sub-Centre is located within Bergenz House (Building 6 on the previous map) and a Royal National Lifeboat Institution (RNLI) Atlantic

Lifeboat with associated slipway and boathouse is based to the east of the marina site. BJ Marine Boatyard (building 7 and lands labelled no. 3 on the above map) provides a variety of services including boat repairs, lifting, servicing, storage and polishing.

- 6.8 In recent years, the seafront area has acted as a backdrop to a number of successful events such as the Sea Bangor Festival, which has proved to be a popular attraction for local residents and external visitors alike.



**Photo 6:** The Sea Bangor Festival is a weekend of family events at the seafront including street performers, food and drink stalls and a visit from a Tall Ship

Source: Visit Ards and North Down

- 6.9 In addition to the settlements referred to above, the developed coastline within other settlements also carry out key functions in relation to the operation of the Borough. These include the RNLI lifeboat and lighthouse in Donaghadee, an RNLI lifeboat station at Portaferry, numerous sailing and yacht clubs and recreational facilities such as Pickie Park in Bangor.



## The Interaction between marine and terrestrial planning

- 7.1 The coastal zone comprises three main elements: the land; the inter-tidal zone; and the sea. Statutory planning control does not extend to the entire coastal zone, although some development which occurs off-shore may impact on-shore, for example fish-farming. Conversely, on-shore development through, for example, discharge of pollutants into the sea may affect fish stocks and the subsequent livelihood of coastal communities. Planning authorities should recognise the inter-relationship between onshore and offshore activities.
- 7.2 For statutory planning purposes the limit of the coastal zone in the seaward direction is the Mean Low Water Mark of Ordinary Spring Tides. The landward limit of the coastal zone is more difficult to define but can be determined by the geographical effects of coastal processes and coastal-related human activity; it is therefore a zone of variable width. It may include areas affected by off-shore and near-shore natural processes, such as areas of potential erosion; enclosed tidal waters, for example estuaries and surrounding areas of land; and areas which are directly visible from the coast. In some places, for example where there are cliffs, the coastal zone may be relatively narrow. Elsewhere, particularly where there are sub-tidal areas of low-lying land and inter-tidal areas, it will be much wider and, for many islands, will consist of their entire area. It is for planning authorities, to define the extent of the coastal zone in their area.
- 7.3 The interrelationships between human activities and these natural processes do not respect administrative boundaries, an example of this being the natural processes of erosion and deposition at work on the coast. Planning authorities should therefore consider whether there are additional areas where they need to work with other authorities and agencies to pursue a co-ordinated approach to issues arising on the coast. Such issues are likely to range more widely than land use planning.

- 7.4 It is therefore clear that the Coastal section of the LDP must be informed by meaningful partnership and engagement with the Marine Division of DAERA and also neighbouring Council areas with which Ards and North Down share a coastal boundary – namely Newry Mourne and Down District Council and Belfast City Council.

## Other relevant Marine Documents

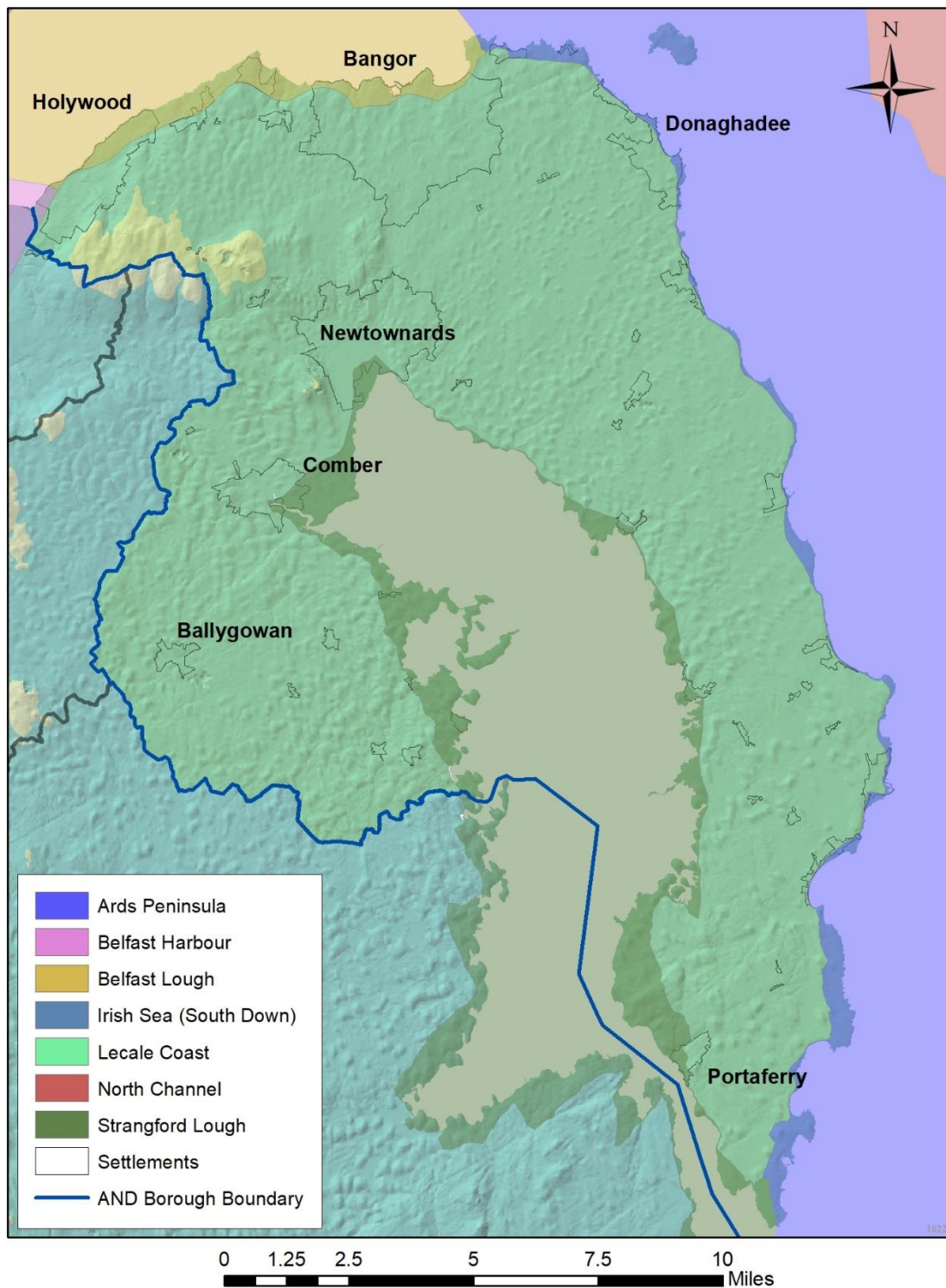
### [The Marine Plan for Northern Ireland](#)

- 8.1 The Marine and Coastal Access Act 2009 and the Marine Act (NI) 2013 require the Department of the Environment (now Department for Agriculture, Environment and Rural Affairs - DAERA) to prepare and adopt Marine Plans that would manage the marine area and contribute to its sustainable development.
- 8.2 DAERA is currently developing marine plans for both the inshore and offshore regions, which will be published as a single document. A sustainability appraisal and Habitats Regulations Assessment are also being finalised to assist in the development of the marine plan. The Local Development Plan Team will need to ensure that the coastal sections of the LDP are complementary to the aims and objectives stipulated in the Marine Plan and vice versa.

### [Northern Ireland Regional Seascape Character Assessment \(NIRSCA\)](#)

- 8.3 Seascape is defined as ‘an area of sea, coastline and land, as perceived by people, whose character results from the actions and interactions of the land with the sea, by natural and/or human factors.’
- 8.4 The aim of the NIRSCA is to provide a strategic understanding of different areas of regional seascape character along the entire Northern Ireland coast. The process includes identifying and mapping different areas and describe the key features and characteristics of these areas. Further discussion of the NIRSCAs can be found in the Landscape Character Assessment Paper.

8.5 There are five seascape character areas (SCAs) that fall wholly and partly within the Borough and these are shown on the following map:



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**Map 5: Seascape Character Areas in Ards and North Down**

## Coastal Management and sea level rise

- 9.1 Conservative estimates of sea level rise (SLR) at Northern Ireland's coastlines predict a rise of 30cm by 2100 (QUB, 2015). This means that 50% of the NI coast has a high likelihood of functional change by 2100.
- 9.2 Erosion is an organic process whereby beaches adjust their shape in response to changing wave and tide conditions. It enables the beaches to survive and fulfil their role as natural buffers. Erosion is transformed from a normal process to a 'problem' when infrastructure or property are affected by shoreline movement. Buildings, roads, recreational areas (particularly golf courses), car parks and caravan sites are most commonly affected by shoreline retreat.
- 9.3 Given that the Ards and North Down Borough is bounded by 115 miles of coastline, it is likely that coastal erosion and sea level rise will become a significant problem for the Borough in the future. Indeed, Ballyhalbert residents identified coastal erosion and appropriate defences as a key issue to be addressed in recent council workshops to inform Ballyhalbert Village Plan (Paul Hogarth Company, 12 April 2016).
- 9.4 Furthermore, the National Trust has identified Mount Stewart and Kearney as one of 5 coastal change hotspots in Northern Ireland. One metre of SLR at Strangford Lough would amount to significant loss of intertidal flats and salt marsh habitats at the northern end of the Lough. The internationally renowned gardens at Mount Stewart have enjoyed protection from frost by a sea plantation on the Lough shore for almost 100 years. The resulting unique microclimate allows rare and exotic plants to flourish in the gardens. However, flooding, erosion, rising ground water and saline intrusion due to predicted sea level rise pose a significant threat to these trees and therefore to the heritage features of the garden in the future. These examples highlight the need for shoreline management in our Borough.



9.5 For over 50 years, coastal erosion in Northern Ireland (and indeed the legacy Ards and North Down Borough) has been addressed by means of the ‘Bateman Formula.’ This is based upon a memo from the head of one (then) ministry in the NI Government to all others, giving primary responsibility to whatever department’s responsibilities most closely coincided with the property most at risk from erosion. Protection was (and is) most frequently achieved by to ‘holding the line’ through the use of hard defences such as seawalls and groynes to protect property and infrastructure behind them.



**Photo 7:** *The coastal defences at Portaferry Road, outside Newtownards*  
*Source: Ards and North Down Borough Council*

9.6 Ultimately this results in the loss of beaches due to the cutting off of landward sand supply and seaward deflection of wave energy. This effectively means the protection of private property at the expense of a natural resource that is of benefit to the wider society. Eventually the sea defences are undermined and need to be re-built or re-inforced. In many instances several generations of sea defences have been built.



**Photo 8:** New coastal defences were put in place in Donaghadee as part of the public realm works in 2015.

Source: Ards and North Down Borough Council.

### [The National Trust Approach](#)

9.7 The National Trust has a significant number of properties along the Borough's coastline. These include Orlock Point, Mount Stewart and Ballyquintin Point. The Trust has adopted an approach that works with nature in allowing areas of coastline to be shaped by the sea rather than formulating hard engineered solutions. St. Anne's Point, near Mount Stewart is an example of such an approach, where sea defences were breached and a salt marsh was created to absorb wave energy.

9.8 In terms of dealing with the challenge of sea level rise and coastal erosion, The National Trust's 'Shifting Shores' document highlights the need for:

- Coastal monitoring for the whole of Northern Ireland;

- The development Province-wide coastal erosion risk mapping to complement the existing river flood risk mapping;
- A coastal planning strategy for living at the coast;
- A single government department taking ownership of coastal erosion and change;
- Shoreline plans that involve Central Government, local councils and all coastal stakeholders to ensure sustainable adaptive management of the coast; and
- The Local Development Plan to identify where development may be permitted in the coastal zone to prevent future developments in erosion or flood risk prone areas.

In any case, the LDP process should start a public debate regarding coastal change.

#### [North Norfolk District Council Coastal Planning Policy Case Study](#)

9.9 North Norfolk District Council coastline is characterised by soft cliffs fronted by beaches and is therefore susceptible to erosion. In response to this, the Council has designated it as a ‘Coastal Erosion Constraint Area’ where there is a presumption against any new development except where it can be demonstrated that it will result in no increased risk to life or significant risk to property.

9.10 It is a matter for The Council to determine if such an approach would be appropriate to the areas most significantly affected by erosion in our Borough, however it should be noted that the North Norfolk Coastal Erosion Constraint Area has been informed by a range of advanced monitoring techniques including aerial photographs and maps and surveys of coastal processes. This data has then been scientifically analysed and culminated to form a coastal erosion map. There is a lack of up to date and accurate shoreline mapping in Northern Ireland meaning that it would be difficult to pinpoint those areas that are at the highest risk of erosion. The only map that includes

Northern Ireland is a European overview produced by the European Environment Agency in 2004, the scale of which is too broad to allow any accurate deductions to be made about the extent of the erosion problem in the Borough.

[East Solent Coastal Partnership \(ESCP\) Best Practice Coastal Zone Management Case Study](#)

- 9.11 The ESCP is a best practice example of a combined and comprehensive approach to coastal zone management spanning across the 170km stretch of coastlines of Fareham, Gosport, Havant and Portsmouth Borough Councils in Southern England. The initiative was driven forward by a need for coastal management that recognises that coastal flooding and erosion risk are not exclusive to Local Authority boundaries. The aim is to reduce the risk of flooding and erosion by encouraging the provision of technically, environmentally and economically sustainable coastal defence and protection measures.
- 9.12 The ESCP consists of a team of engineers, scientists and coastal specialists, who work together to form coastal strategies and management plans. These are informed by a range of research techniques such as topographic data, 3d beach modelling, laser scan imagery and aerial photography. This information is supplemented by survey work in the form of tidal gauge and wave buoy monitoring, beach profile surveys and sediment analysis, all aimed at gaining a better understanding of how the coast adjusts to seasonal changes, storm surge events and human interventions. This information can then be used to formulate coastal policies and to determine the best approach to dealing with the challenges of erosion and flooding in specific locations. These may include defence options such as seawalls, revetments and groynes but in other cases will involve more sustainable solutions such as sand replenishment of beaches and re-profiling of beach slopes.

9.13 The ESCP also provides the opportunity for local residents to get involved in initiatives and to provide information that will help advance coastal knowledge. The ESCP website and accompanying literature encourages financial contributions but also sharing of knowledge, expertise, materials and facilities. As part of a holistic approach to the overall understanding and management of the coastal zone, 'Solent Bird Studies Project' has also been developed by ESCP and this encourages local people to help scientists gather data on how birds use the Solent coastal area. A citizen science app and website allow participants to record single ad-hoc sightings or to survey an entire area.

## Conclusions

10.1 The Borough's beautiful coastline is a key environmental and economic asset and is the focus for much of the Borough's settlements. The coast is a dynamic changing environment subject to erosion and storm damage from the sea. The SPPS has specific criteria for the preparation of LDPs advising that development should avoid the undeveloped coast. Many of the coastal settlements rely on the wider coastline and their immediate undeveloped coastal corridors as areas for recreation and as a buffer to the sea. Beaches can provide a natural coastal defence against storms. Organisations such as the National Trust advocate a natural response of coastal realignment in response to the increase in frequency of storms and climate change which may take pressure off other parts of the coastline. Many types of development do not suit coastal locations liable to erosion and flooding during storms.

10.2 Areas such as Strangford Lough and the Copeland Islands are of international significance from a natural heritage point of view and the unique habitats and species should be afforded the same high level of recognition in the future LDP as they have in previous Plans.

10.3 It is clear that knowledge of the coast and an understanding of the potential changes that may occur to it in the future are not yet fully

known. A precautionary approach is advocated in regional planning. Approaches such as that advocated by the National Trust and applied elsewhere in the UK, require further consideration in the production of the Council's LDP.

## Appendix A

### Coastal Local Landscape Policy Areas (LLPAs)

#### Former Ards Borough

<b>Donaghadee</b> LLPA 1	<u>Portavo House and Demesne</u> Features: trees, historic dwelling, water tower on localised hill, historic park
LLPA 4	<u>Croagh Patrick Nursing Home, St. Patricks Graveyard and standing stone</u> Features: archaeological features, undeveloped coastline, tree groups
LLPA 8	<u>The Commons and Coastline</u> Features: attractive stretch of coastline, public recreational area
<b>Ballyhalbert</b> LLPA 1	<u>Motte, Standing Stone and Church Site</u> Features: Motte, standing stone, distinctive landform
<b>Ballywalter</b> LLPA 1	<u>Ballywalter Park and Coastline</u> Features: Trees, listed house, lodge and entrance gates, planting, tree ring
LLPA 2	<u>Holy Trinity Church and setting</u> Features: listed church and rectory, mature trees
LLPA 4	<u>Harbour Area and Coastline</u> Features: amenity area, harbour, public walkways, picnic areas
<b>Cloughey</b> LLPA 2	<u>Landform between Portavogie and Cloughey</u> Features: localised hill, raised beach, attractive coastal landscape
LLPA 3	<u>Presbyterian Church, shoreline and headland</u> Features: church, headland and raised beach, hilltop monument
LLPA 4	<u>Caravan Park and adjoining lands</u> Features: undeveloped headland, attractive shoreline
<b>Kircubbin</b> LLPA 1	<u>Monaghan Bank</u> Features: headland, public access along shore, raised beach and bank
LLPA 2	<u>Nunsquarter and associated lands</u>



	Features: listed house and weighbridge, headland and distinctive bank
<b>Millisle</b> LLPA 1	<u>Woburn House and wooded estate</u> Features: woodland, planned parkland, listed house, thatched cottage
LLPA 2	<u>Shoreline and Amenity Area</u> Features: open space, walkways, child's play area, panoramic views
<b>Portaferry</b> LLPA1	<u>Portaferry House, grounds and associated plantings</u> Features: woodland/parkland, listed buildings, monuments, walled garden
<b>Portavogie</b> LLPA 1	<u>Area of rough grassland south of New Harbour Road</u> Features: coastal strip designated as part of Outer Ards ASSI, amenity area
LLPA 2	<u>Landform between Portavogie and Cloughey</u> Features: localised hill, steep embankment, attractive coastal feature
<b>Ballydrain</b> LLPA 1	<u>Ringneill House and river corridors</u> Features: landscaped gardens, and mature trees

### Former North Down Borough

<b>Bangor</b> BR 23	<u>Carnalea</u> Features: golf course, ND coastal path, railway wildlife corridor
BR 27	<u>Lukes Point</u> Features: coastal headland including Kingsland recreational ground and yacht club
BR 29	<u>Stricklands Glen</u> Features: heavily wooded natural glen with water features
BR 31	<u>Wilson's Point</u> Features: listed buildings, coastal path, Pickie Fun Park
<b>Hollywood</b> HD 14	<u>Marino/Cultra</u> Features: coastal strip on seaward side of ND coastal path
HD 17	<u>Seapark</u> Features: recreational grounds, vegetation along railway embankment



<b>Groomsport</b> GT 07	<u>Groomsport shoreline</u> Features: Fort Hill archaeological site, harbour and recreational space, listed buildings
GT 08	<u>Main Street</u> Features: listed building
<b>Helen's Bay</b> HY 04	<u>Crawfordsburn Country Park</u> Features: archaeological sites and monuments, park and golf course, listed buildings
<b>Seahill</b> SL 06	<u>Seahill Coastal Area</u> Features: ND coastal path, golf course, listed buildings, Camphill
<b>Orlock</b> OK 04	<u>Orlock Lane</u> Features: locally significant buildings together with WW2 observation post

## References/Useful Links

The Regional Development Strategy (RDS 2035)

<https://www.planningni.gov.uk/index/policy/rds2035.pdf>

The Strategic Planning Policy Statement (SPPS)

<https://www.planningni.gov.uk/spps>

The draft Belfast Metropolitan Area Plan (BMAP 2015)

[https://www.planningni.gov.uk/index/policy/dev\\_plans/devplans\\_az/bmap\\_2015.htm](https://www.planningni.gov.uk/index/policy/dev_plans/devplans_az/bmap_2015.htm)

The Ards and Down Area Plan 2015

[https://www.planningni.gov.uk/index/policy/development\\_plans/devplans\\_az/ardsdown\\_2015.htm](https://www.planningni.gov.uk/index/policy/development_plans/devplans_az/ardsdown_2015.htm)

Department for Agriculture, Environment and Rural Affairs

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)

NI Regional Seascape Character Assessment

<https://www.daera-ni.gov.uk/publications/northern-ireland-regional-seascape-character-assessment>

Ballyhalbert Village Plan

<http://www.ardsandnorthdown.gov.uk/resident/community/regeneration/village-plans>

North Norfolk District Council

<https://www.north-norfolk.gov.uk/section/planning>

National Trust Shifting Shores

<https://www.nationaltrust.org.uk/features/living-with-change-our-shifting-shores>

The European Environment Agency

<https://www.eea.europa.eu/>

QUB/UU/Open University Seminar Report: Shoreline Management and Planning in Northern Ireland

[http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge\\_exchange/briefing\\_papers/series4/2015-04-15-kess-shoreline-management-planning-in-northern-ireland1.pdf](http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series4/2015-04-15-kess-shoreline-management-planning-in-northern-ireland1.pdf)

Shoreline Planning for Northern Ireland Seminar Report

<https://www.nienvironmentlink.org/cmsfiles/Shoreline-Planning-for-Northern-Ireland.pdf>

Eastern Solent Coastal Partnership

<http://www.escp.org.uk/>