



ADDITIONAL INFORMATION BOOKLET

## REPRESENTATIONS TO DRAFT PLAN STRATEGY

SEAFORDE DEMESNE ESTATE

SEPTEMBER 2025

## CONTENTS

1. INTRODUCTION & BACKGROUND
2. SETTING & HISTORY OF SEAFORDE VILLAGE AND SEAFORDE DEMESNE ESTATE
3. CONSIDERATION OF PLANNING CONCERNS
4. CONCLUSION

## APPENDIX 1

### Site Location Plan

## 1. INTRODUCTION & BACKGROUND

This representation has been prepared by APD Architects Ltd. on behalf of our client, in response to the consultation in respect of the Newry Mourne & Down District Council ('the Council') Local Development Plan 2035 Draft Plan Strategy ('DPS') issued on 27th June 2025.

This representation relates to the soundness of the proposed policy which is fundamentally flawed as it does not recognise the significance of the Seaforde Demesne Estate as integral and thus strategically linked to the development of the village of Seaforde.

It relates to the entire settlement of Seaforde and to land that is not currently within settlement limits under the terms of the Ards & Down Area Plan 2015. The subject lands comprise the historic environment asset that is Seaforde House and other buildings, features and heritage assets within the 1000-acre / 405 Ha Demesne Estate.

## 2. SETTING & HISTORY OF SEAFORDE DEMESNE ESTATE AND SEAFORDE VILLAGE

The current Area Plan development limit at Seaford is illustrated as below. The current settlement limit is outlined in black and limited to the area designated as the village; the Demesne Estate of Seaforde is represented further by the LLPA 1 and LLPA 2 designations outlined in green.

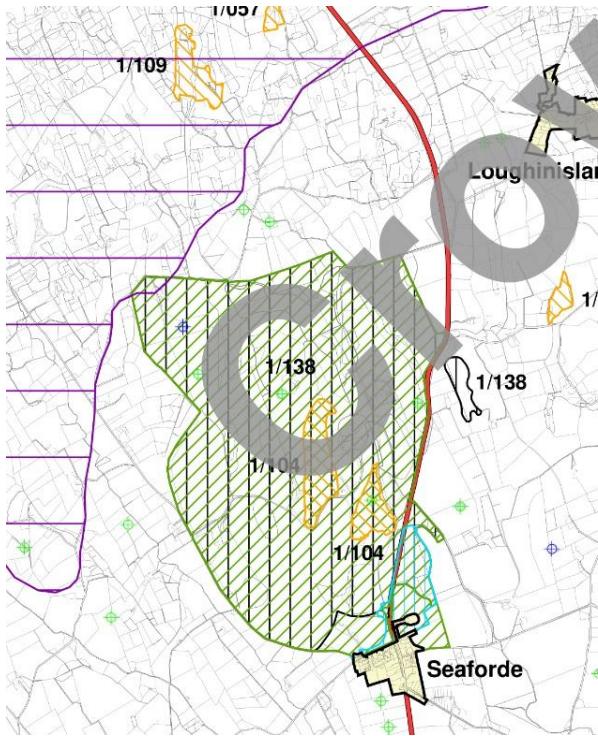


Fig. 1 Ards and Down Area Plan Map 3\_001a

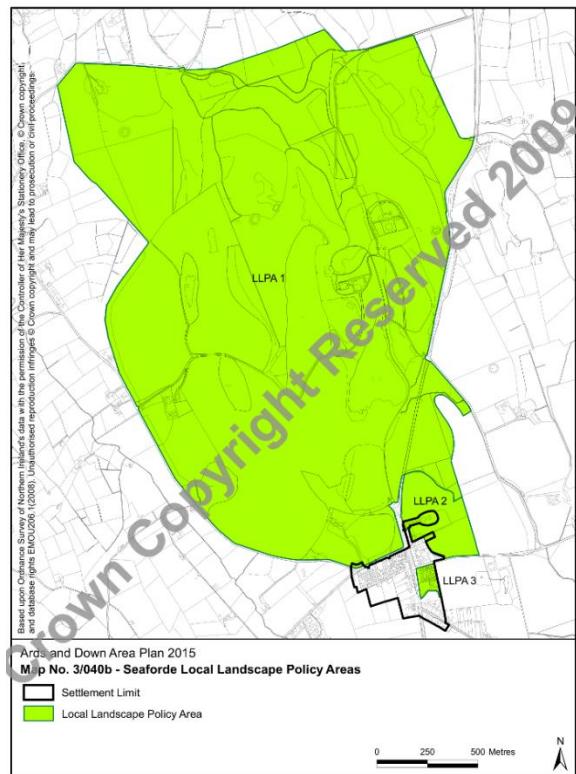


Fig. 2 LLPA 1 designation

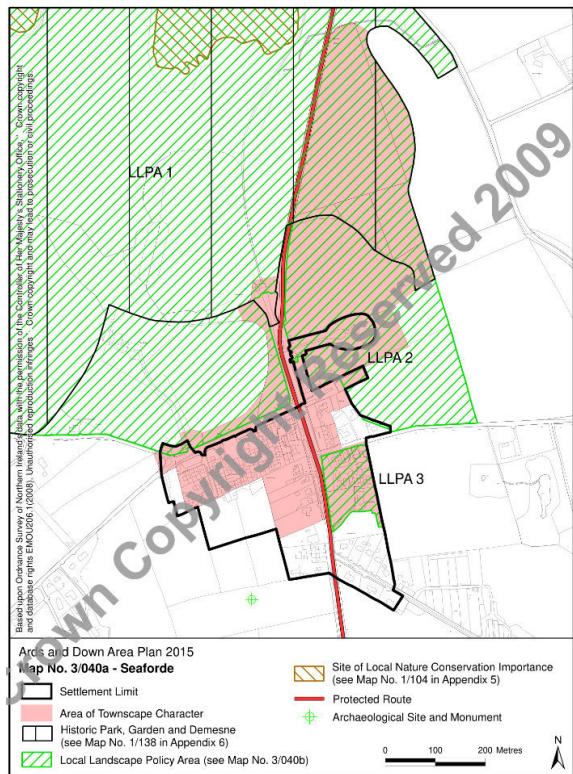


Fig. 3 Settlement Limit for Seaforde

## Setting of Seaforde

Seaforde is a small village situated on the main Ballynahinch to Newcastle road in County Down. The village is named after the Forde family who have held the lands since the 17th century and developed the demesne and gardens and still reside in the village. Seaforde is a planned estate settlement of the Demesne bearing the same name. The village is clustered round the Church of Ireland parish church of 1720 and the demesne walls of Seaforde House. The village took on its present built form from the mid-19th century and architecturally, the style is varied and includes Greek Revival, Classical Georgian, The Picturesque and Tudor Gothic Revival.

## History of Seaforde Demesne Estate

Seaforde Demesne has been home to the Forde family for almost 400 years. The name 'Seaforde' dates from the early 18th century and combines the family name 'Forde' with the old English/French word 'See', meaning 'seat of'. 'Demesne' is an old Norman French word meaning 'belonging to the lord of the manor' and refers to lands immediately surrounding a manor house, retained directly for the use and enjoyment of that house and its occupants.

Throughout the centuries, Seaforde's buildings, parkland, farmland, woods and gardens have evolved and adapted in shape, size and purpose as each successive generation leaves its mark.

The Forde family originate from County Meath. The Demesne lands were acquired by the family from 1615 to 1628, when Mathew Forde (c 1590-1652) of Meath and Dublin purchased over twenty thousand acres of the Barony of Kinelarty, known as the Manor of Teconnaught, from Thomas Cromwell, 1st Viscount Lecale, for the then considerable sum of £8,000. In 1614 Mathew married Eleanor MacArtan, a niece of the Irish Chieftain Phelim MacArtan, who, in 1605, had sold some of his Kinelarty lands to Thomas Cromwell's father, Edward, 3rd Baron Cromwell. Edward Cromwell was a great-grandson of the famous Tudor statesman, Thomas Cromwell, the chief minister to King Henry VIII.

During the 1600's and the early 1700's the Forde family lived primarily in Dublin and on their other estate in Coolgreany, Wexford. It wasn't until about 1750 that the family turned their attention to transforming Seaforde into the 'landscaped' demesne that we see today.

## Components of the Estate

**The Landscape** - From 1750 onwards, following his marriage to Elizabeth Knox, sister of 1st Viscount Northland, the then Mathew Forde MP (1726 - 1795) rose to the challenge of making improvements to the demesne by laying out the parkland in the fashionable 'English landscape' style. He replanted enlarged woods and belts of beech, oak, lime, and fir, to accentuate the setting of the house, which was set between two picturesque lakes against the backdrop of the Mourne Mountains. It was during this period that the walled garden at Seaforde probably came into being given that it makes its first appearance in an estate map of 1750.

**The Walled Garden** - The 5-acre walled garden, which today contains the tropical butterfly-house and maze garden, is comprised of two halves. The northern half, where the butterfly-house and café are located, was originally the kitchen garden for the main house, as evidenced by the massive curved northern side to maximize the exposure to sunlight and radiated heat.

The southern half of the walled garden, which is now the maze garden, was formally an expansive ornamental garden. Photographs from the 1860's suggest a high-Victorian ornamental style with bold axial paths, Italianate urns and formal beds.

**The Glasshouses** - On the south facing wall (which divides the two halves) there once stood a long facade of glasshouses. Maps of 1815 show these glasshouses, along the central section which no doubt contributed to Seaforde's head gardener in 1833 receiving 1st, 2nd and 3rd prizes for 'best Pine' (pineapple), and 1st prize for melons at the 1833 Belfast Horticultural Show. Today these glass houses have completely gone. By the 1950's these labour-intensive gardens had been abandoned and fallen into dereliction. It wasn't until the 1970's, under the stewardship of Patrick and Lady Anthea Forde, that the walled garden area enjoyed a resurrection and reinvention with a new garden layout, with the maze as the centerpiece, to become the Maze Garden that you see today.

**The Pheasantry** - A photograph of the Pheasantry taken around 1860 shows a number of young conifer specimens in cultivation, with gardeners carefully cutting the grass, with what appears to be an early hand-pulled lawnmower. This photograph gives us a fascinating insight into how the Pheasantry looked as the Victorian arboretum began to take shape.

It is worth noting that the historic boundary of the village is different from how the village boundary is read today with housing on the northern side of Main Street and west of Newcastle road, opposite the entrance to the Cofl Church during the 19<sup>th</sup> century.

### Current uses of the Estate

- Agricultural land and working farmland.
- Woodland supporting diverse flora and fauna.
- Public access attractions (walled garden, butterfly house, pheasantry).
- Residential properties across the estate.
- Event, tourism, and leisure uses (heritage tours, educational visits, seasonal events).
- Heritage events: Seaforde House and multiple listed structures (gates, lodges, kennels, stables, farmyard complexes, almshouses).
- Environmental assets including two lakes, extensive woodland, views to the Mourne Mountains
- Filming venue for NI Film Industry
- Seaforde Estate has already granted public access to estate woodland immediately north of the Cofl church with the opening of a new pathway and also opened up public access in the forest of Tievenadarragh a few miles north of the village.

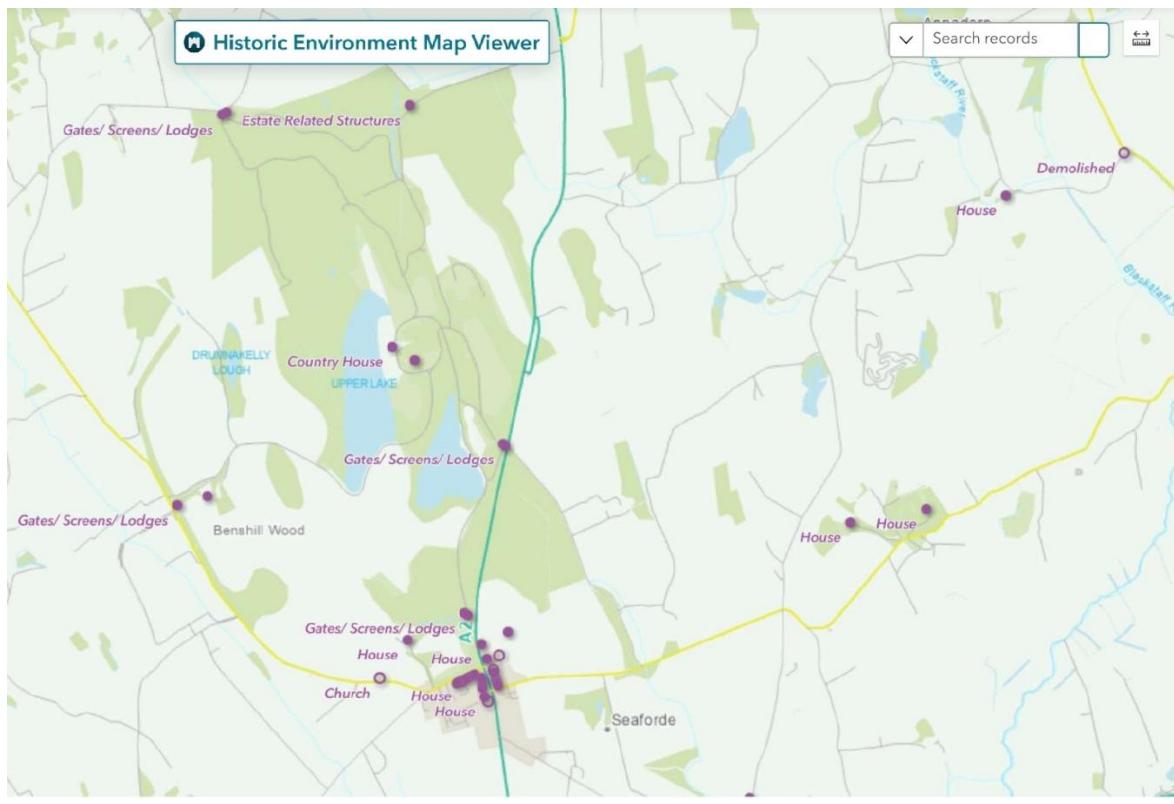


Fig. 4 Heritage Assets: Seaforde Demesne Estate

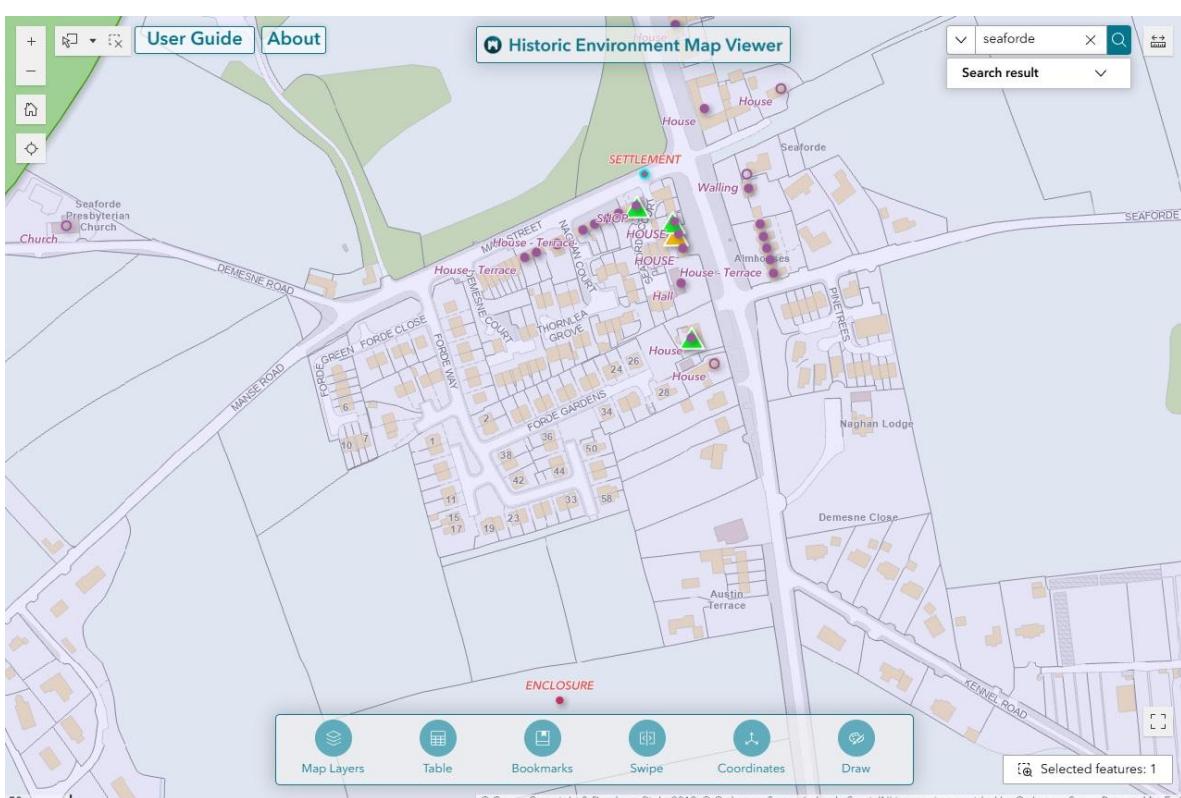


Fig. 5 Heritage Assets: Close-up of Seaforde Village

This rich heritage is reflected in the number of listed buildings present within and around the Seaforde Demesne Estate and village and is at its core is its heritage story.

## HERITAGE ASSETS SEAFORDE DEMESNE ESTATE & VILLAGE

### Listed Historic Buildings

HB18/17/001	Loughinisland C of I parish church
HB 18/17/002 A	Seaforde Gate Lodge
HB 18/17/002 B	Arch gates and gate screen
HB 18/17/003	Seaforde House
HB18/17/004 A	Almshouse
HB18/17/004 B	Almshouse
HB18/17/004 C	Almshouse
HB18/17/004 D	Almshouse
HB18/17/004 E	Almshouse
HB18/17/005 B	Terrace House
HB18/17/005 C	Former Rural Industry
HB18/17/005 D	Former Rural Industry
HB18/17/005 E	Terrace House
HB18/17/005 F	Terrace House
HB18/17/006	Former School House
HB18/17/007	House and Outbuilding
HB18/17/008	Former Outbuilding (now a house) (Record only)
HB18/17/009 A	Allan Lodge
HB18/17/009 B	Gates and walling at Allan Lodge (Record only)
HB18/17/010	House (Record Only)
HB18/17/011	Masonic Hall
HB18/17/012 A	House
HB18/17/012 C	House
HB18/17/013	Former Shop
HB 18/17/015	Gate lodge
HB 18/17/016	Presbyterian Church (Record only)
HB 18/17/017	West Gate Lodge, piers walling and railings
HB 18/17/018	Lower farm courtyard
HB 18/17/019 A	Ballynahinch Gate Lodge
HB 18/17/019 B	Gates, piers, railings and walling
HB 18/17/021	Stable yard, outbuildings, laundry, gas plant, laundry drying green wall, tunnel
HB 18/17/022 A	Downpatrick Gate Lodge
HB 18/17/022 B	Downpatrick gate
HB 18/17/024	Kennels, huntsman's house including stables and former byre
HB18/17/057	House (Record Only)
HB18/17/058	Former Police Station
HB 18/17/062	Estate worker's lodge

### Scheduled Monuments

SMR DOW 037:006	Fort Elizabeth Enclosure
SMR DOW 037:007	Gardenhill Fort counterscarp rath
SMR DOW 037:008	landscape feature
SMR DOW 037:010	Blackwood's Fort counterscarp rath
SMR DOW 037:011	enclosure
DOW037:122	Seaforde Demesne

### Industrial Heritage

IHR 03353	Gasometer
-----------	-----------

### 3. CONSIDERATION OF PLANNING CONCERNS

It is important that Seaforde Demesne Estate including Seaforde Village is considered and understood in the context of its historical development, as set out under the earlier section of this document and as a living historic entity that requires structure around its retention in order to become a viable entity for future generations to use and enjoy. Without this, the historic integrity of the Demesne Estate and including the village cannot be guaranteed.

**“Heritage is finite, and I always liken it to if you go to a protected ancient monument and destroy bits of it, it’s the same thing as taking a book out of a library that no one has ever read and burning that book, and people will then never know the story that’s in there.”**

**commenting on Dunmill Hillfort, 12.09.2025**

Seaforde Village exists due to the historic need to supply the Demesne Estate with housing for its necessary workforce arising from its extended development.

Within the current lands, there are multiple dwellings, buildings and uses established on the site including extensive woodland within the managed and planned environment.

In this respect, Seaforde represents is a unique piece of heritage to Northern Ireland and one that needs a considered plan to establish Seaforde as a sustainable estate once again and to ultimately retain that heritage for generations to come.

#### Current Planning Policy

Seaforde contains 3 LLPA's associated with the Demesne and is designated as an Area of Village Character. Seaforde is also noted within the Historic Parks, Gardens and Demesne Register as D/059 and is Registered Grade A\* and its earlier predecessor Northern Ireland Heritage Gardens Inventory of 1992 under reference D/059 J401433 Seaforde House.

The current policy states that the designated Settlement Limit SE 03 has been drawn to protect the landscape setting provided by the demesne lands and important trees to the north and the church and surrounding slopes to the north east, prevent further linear expansion along public roads and allow for additional housing opportunities in conjunction with existing development. It should be noted that these lands are very limited within the context of the Settlement Limit and do not adequately support the future development of Seaforde as a sustainable Demesne estate.

The current policy goes on to state that the design of development proposals within the designated area are required to be:-

- in keeping with the overall historic layout and built form of the small settlement in terms of scale, massing, materials and detailing.
- respectful buildings in order to retain the significance and architectural integrity of key elements within the townscape.

Current policy has separated the heritage assets within Seaforde and the query over the soundness of the proposed LDP brings into question how the sustainable future of the heritage assets of Seaforde which has been failed under current policy and how can development policy now be considered in terms of delivery a mechanism for re-unification of Seaforde heritage assets.

## Proposed Approach Under DPS

The DPS Strategic Designation SETT1 – Settlement Hierarchy confirms that Seaforde is to be designated as a small settlement in the proposed settlement hierarchy under the DPS Spatial Growth Strategy (Table 5 of the DPS). That position aligns with the previous development plan – the Ards & Down Area Plan 2015.

A large proportion of the Seaforde is designated as an Area of Townscape Character (ATC) and there are 22 listed buildings in the settlement which is significant. The Settlement Appraisal also recommends that further consideration should be given to Seaforde ATC being designated as a Conservation Area.

Related to that the Seaforde Demesne to the north is designated as an LLPA and Historic Park, Garden, and Demesne. In that context, the Council has concluded that the designation as a small settlement provides a robust basis to protect the built heritage and will assist in preventing inappropriate development.

We support the DPS objectives in seeking to protect, conserve and enhance the heritage assets, in promoting their sensitive re-use and to support their conservation and development as economic opportunities.

Strategic Policy ENVS1 – Protecting, Conserving & Enhancing the Historic Environment will support development proposals which seek to protect, conserve and where possible enhance heritage assets including Listed Buildings. THE DPS relies on a number of operational policies to secure these objectives. Policies HE6 – Change of Use of a Listed Building, HE7 – Extension or Alteration of a Listed Building and HE10 – Development Affecting the Setting of a Listed Building, are of particular relevance.

However, it is our considered view that the DPS should avail of the opportunity to adopt a more positive and progressive approach to the protection, conservation and enhancement of valued historic assets. The DPS provides an opportunity to deliver a positive and sustainable outcome for Seaforde and its important heritage context.

In its regional objectives, the RDS seeks to promote a coordinated and sustainable approach related to an understanding of the ‘sense of place’. RG7 – Support Urban & Rural Renaissance states that cities, towns, villages and many neighbourhoods have unique identities, and these should be recognised and built upon and enhanced. Finally, RG 11 specifically seeks to conserve, protect and enhance the built heritage and recognises that historic sites, buildings and landscapes do not exist in isolation. ‘Their appropriate management and wider integration with their surroundings will help contribute to local character and ensure that these assets continue to make a valuable contribution to our tourism economy.’

The SPPS, at paragraph 4.38, states:

“Our environment must therefore be managed in a sustainable manner in accordance with the Executive’s commitment to preserve and improve the built and natural environment and halt the loss of biodiversity. This requires an integrated approach to the management of the natural and cultural aspects of the landscape. Whilst all of us share a collective responsibility in this regard the planning system plays an important role in conserving, protecting and enhancing the environment whilst ensuring it remains responsive and adaptive to the everyday needs of society. This is a key aspect of the wider objective of furthering sustainable development which planning authorities should consider in the preparation of LDPs and carrying out of their development management functions.

The Seaforde Estate is central to the story of the development of Seaforde as a settlement. It is linked to the numerous other heritage assets referenced above. The DPS policy response should reflect that relationship and interdependency.

Any failure to do so will render the DPS unsound in the following respects:

- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
- Consistency Test C3 – it fails to take proper account of policy and guidance in the SPPS.
- Coherence & Effectiveness Test CE2 – it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular it is not founded on a robust and reliable evidence base.

### **The Aspirations**

The social, political, cultural and economic landscape that has emerged since the last planning policy was drawn up for Seaforde is significantly changed. As Northern Ireland embraces and understands its past, its tourism potential has also developed in ambition, language and pace. Current aspirations as cited by the economy minister Conor Murphy in January 2025 are for a doubling of the size of the Northern Irish Tourism Industry with 17 target objectives to generate some £2bn from overnight visitors by 2035. The growth of the Northern Ireland film industry in recent years, with the filming of major TV series locally, has generated some £43m for the Northern Ireland economy. Seaforde has been used as a filming venue and in this respect Seaforde is already playing an active role in feeding back into the wider economy of Northern Ireland. With the governments ambitions for Zero Carbon, all new policies are shaped and influenced by the aspirations to drive down carbon emissions and this is the ambition for creating sustainable environments in the future.

Seaforde, as a destination in itself, displays a proven attractiveness through its built environment and setting within the historic landscape and is located en-route to other attractions within the vicinity. Its potential to not only provide a sustainable environment for Seaforde Demesne Estate but the inherent ability to capture carbon and further educate others through the examples and experience is not only ingrained but truly tangible. However, as a village, it does not contain all the key components that would make this a sustainable entity for a larger supportive population or as a tourism centre. The vision that is needed to meet the economic aspirations of the province, as well as build on the components that make Seaforde an attractive destination, needs to be embedded in heritage-focused policy that supports the best of outcomes for Seaforde.

The long term vision is to establish Seaforde as a sustainable, resilient and accessible estate. This requires the following:

**Stewardship of heritage and landscape assets**, ensuring their repair, maintenance and celebration for future generations.

**Integration of sustainability and biodiversity**, embedding regenerative faring, habitat restoration, rewilding, tree planting and climate resilience measures.

**Opening new public access** and developing sensitive tourism opportunities, positioning Seaforde as an exemplar for Irish Estates.

**Economic resilience** through carefully planned diversification of uses, enabling development where justified under PPS23 to address the conservation deficit.

**Community and employment opportunities**, offering heritage craft skills, training, tourism employment and engagement with local communities.

#### 4. CONCLUSION

The Seaforde Estate's representation seeks inclusion in the Local Development Plan framework in order to recognise its strategic role as a registered historic demesne with national significance. Its capacity to deliver sustainable growth in tourism, employment, biodiversity and climate resilience for Northern Ireland is the driver behind this submission.

Intervention is required to secure the long term conservation of the heritage assets and this should be contained within policy which supports making Seaforde Demesne Estate a viable, sustainable, resilient and accessible environment.

The council is invited to work with the Estate, statutory consultees and heritage bodies to secure a holistic and deliverable strategy for Seaforde Estate's future beyond the existing policy remit and within the context of the future strategic and operational LDP proposals to safeguard the future of this important heritage asset.

The Estate requests that they are included in any inquiry process to discuss these matters further.

**APPENDIX 1**

**Site Location Plan**

## THE SEAFORDE ESTATE

CO. DOWN



PROJECT Seaforde Demesne, Newcastle	SCALE/S 1:5000 @ A1
DWG FILE Overall Estate Layout	JOB NO F5361-050-01-03-002
DATE 03-10-24	DRAWN BY BC

REVISION	DESCRIPTION	BY	DATE
PLANNING			
BUILDING CONTROL			
RECORD			

FOR APPROVAL  
THIS DRAWING, IF PRINTED, IS A COPY OF A DIGITAL DRAWING  
DESIGNED FOR THAT FORM. THIS COPY IS FOR INFORMATION ONLY  
AND IS NOT TO BE USED FOR CONSTRUCTION PURPOSES.  
ON COPY 512382 OR VM  
National Grid Reference System





# Draft Plan Strategy Representation Form

Please complete this representation form online and email to [ldp@nmandd.org](mailto:ldp@nmandd.org) or alternatively print and post a hardcopy to: -

Local Development Plan Team  
 Newry, Mourne and Down District Council  
 Downshire Civic Centre  
 Downshire Estate, Ardglass Road  
 Downpatrick BT30 6GQ

ALL REPRESENTATIONS MUST BE RECEIVED NO LATER THAN 5PM ON MONDAY 22 SEPTEMBER 2025

## Section A | Your Details

**Q1** Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? *Please only tick one:*

- Individual** *(Please fill in the remaining questions in this section, then proceed to Section B)*
- Organisation** *(Please fill in the remaining questions in this section, then proceed to Section C)*
- Agent** *(Please fill in the remaining questions in this section, then proceed to Section D)*

**Q2** What is your name?

Title [REDACTED]

First Name [REDACTED]

Last Name [REDACTED]

Address Darragh House, 112 Craigdarragh Road, Helen's Bay, Co. Down, BT19 1UB

Email [REDACTED]

**Q3** Did you respond to the previous Preferred Options Paper?

- Yes
- No
- Unsure

## Section B | Individuals *(if different to Q2 above)*

Address [REDACTED]

Town [REDACTED]

Postcode [REDACTED]

## Section C | Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section.

Organisation / Group Name		
Your Job Title / Position		
Organisation / Group Address (if different to above)		
Address		
Town		Postcode

## Section D | Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

### Client Contact Details

Title			
First Name		Last Name	
Address			
Town		Postcode	

**Q4** Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP? (please select one item only)

Agent     Client     Both

## Section E | Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section I.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be unsound having regard to the soundness tests in Section I. It is important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally at the Independent Examination.

## Section F | Type of Procedure

**Q5** Please indicate if you would like your representation to be dealt with by (*please select one item only*):

**Written** (*Choose this procedure to have your representation considered in written form only*)

**Oral Hearing** (*Choose this procedure to present your representation orally at the public hearing*)

Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

## Section G | Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner in understanding the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

### Sound

If you consider the draft Plan Strategy to be Sound and wish to support the draft Plan Strategy, please set out your comments below.

N/a

## Section H | Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

**Q6** If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

[Development Plan Practice Note 6 Soundness \(infrastructure-ni.gov.uk\)](http://infrastructure-ni.gov.uk)

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

### Note:

*If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.*

## Section I | Tests of Soundness

### Procedural tests

**P1** Has the plan been prepared in accordance with the Council's Timetable and the Statement of Community Involvement?  
 Yes  No

**P2** Has the Council prepared its Preferred Options Paper and taken into account any representations made?  
 Yes  No

**P3** Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?  
 Yes  No

**P4** Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?  
 Yes  No

### Consistency test

**C1** Did the Council take account of the Regional Development Strategy?  
 Yes  No

**C2** Did the Council take account of its Community Plan?  
 Yes  No

**C3** Did the Council take account of policy and guidance issued by the Department?  
 Yes  No

**C4** Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?  
 Yes  No

### Coherence and Effectiveness tests

**CE1** The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.  
 Yes  No

**CE2** The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.  
 Yes  No

**CE3** There are clear mechanisms for implementation and monitoring.  
 Yes  No

**CE4** The plan is reasonably flexible to enable it to deal with changing circumstances.  
 Yes  No

## Section J | Which part(s) of the draft Plan Strategy are you commenting on?

Your response should clearly relate to the relevant section, paragraph or policy of the draft Plan Strategy. If you consider more than one part of the draft Plan Strategy is unsound, please number your issues clearly and provide this information in the same running order following your original comment (i.e. relevant Policy, Section or Proposals Map).

**Relevant Policy number(s)** ENVS1 - HE6-10, HE15, RG4, RG6, RG7, RG11

*(and/or)*

**Relevant Section/Page Number**

*(and/or)*

**Proposals Map**

## Section J | Which part(s) of the draft Plan Strategy are you commenting on?

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as clear and concise as possible.

The current strategy and operational policy fails to meet the requirements to deliver on the RDS and SPPS objectives in relation to consideration of built heritage assets in their wider context and, in particular, how they contribute to a sense of place.

If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.

Refer to the attached document

## Section K | Monitoring

Do you consider there are clear mechanisms for implementation and monitoring of the draft Plan Strategy?

Yes

No

Do you have any comments?

The Seaford Estate's representation seeks inclusion in the Local Development Plan framework in order to recognise its strategic role as a registered historic demesne with national significance.

Its capacity to deliver sustainable growth in tourism, employment, biodiversity and climate resilience for Northern Ireland is the driver behind this submission.

Intervention is required to secure the long term conservation of the heritage assets and this should be contained within policy which supports making Seaford Demesne Estate a viable, sustainable, resilient and accessible environment.

The council is invited to work with the Estate, statutory consultees and heritage bodies to secure a holistic and deliverable strategy for Seaford Estate's future beyond the existing policy remit and within the context of the future strategic and operational LDP proposals to safeguard the future of this important heritage asset.

## Section L | Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

Do you have any comments on the SA?

Scope and breadth of the SA noted and understood

Section M | Habitats Regulation Assessment (HRA)

Do you have any comments on the HRA?

Yes  No

If you have indicated Yes, please set out your comments on the HRA below:

Section N | Equality Impact Screening Report (EQIA)

Do you have any comments on the EQIA?

Yes  No

If you have indicated Yes, please set out your comments on the EQIA below:

## Section O | Rural Needs Impact Assessments (RNIA)

Do you have any comments on the RNIA?

Yes  No

If you have indicated Yes, please set out your comments on the RNIA below: