



Draft Plan Strategy Representation Form

Please complete this representation form online and email to 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

First Name

Last Name

Address

Email

Q3 Did you respond to the previous Preferred Options Paper?

- ☒ Yes ☐ No ☐ Unsure

Section B | Individuals (if different to Q2 above)

Address

Town

Postcode

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	Connex Offsite	Last Name	
Address	Loughbrook Industrial Estate, 111 Camlough Road		
Town	Newry	Postcode	BT35 7EE

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.

Q5

Section G | Is the draft Plan Strategy Sound?

Q6

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

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)

(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.

SETT 1 Settlement Hierarchy; EDS 1 Economic Development Strategy;

SGS 1 Spatial Growth Strategy; Strategic Policy EDS1 Employment Land Allocation

SETT 1: Bessbrook was previously considered for reclassification as a small town within the Preferred Options Paper. The decision to retain it as a tier 3 settlement (village) does not take account of the actual level of service provision and employment available and potentially available; it takes no account of the rate of growth in the local secondary school; and it takes no account of the large social housing need in the area.

There has been significant economic activity around Loughbrook Industrial Estate, in particular. With further growth, and service provision, Bessbrook could in fact be classified as a small town, especially when one takes account of the large scale proposals under consideration at Bessbrook Mill.

The Plan Strategy's Economic Development Strategy's Stage 1 research (taking stock of the situation) relies upon outdated information and does not take account of the expansion or growth of Loughbrook, for example. If properly taken into account, additional development opportunities would be identified, with the settlement enlarging in geographical size and also status (in the settlement hierarchy).

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.

The Plan Strategy recognises that Bessbrook's area zoned for economic development has been exhausted. The Plan Strategy needs to be revised to allow for future growth in this sector.

The Plan Strategy needs to be revised to ensure there actually is a generous supply of suitable and available land at a variety of locations. Provision needs to be made for expansion at Loughbrook.

Strategic Policy EDS1 Employment Land Allocation needs to be revised as the area developed in 2020 is not reflective of today's situation. The allocation will be neither continuous nor generous. The Strategic Employment Location at Newry has been committed already so the Plan Strategy must be revised to put forward alternative locations in Newry and / or its surrounding areas - of which Loughbrook would be suitable.

While the Strategy indicates that consideration will also be given to the identification of additional lands at the Local Policies Plan stage, that will be too late in the process and the Plan needs to be revised now.

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?

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

Do you have any comments on the SA?

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:

The Rural Needs Act (NI) 2016 places a duty on local authorities to assess whether any major policy or strategy would have a differential impact on rural areas. At Preferred Options Stage it was suggested that Bessbrook would be upgraded in status, but now this is to be reversed. This would appear to be a major policy shift and Plan-makers would appear now be preparing to make a significant reduction in the level of service provision the residents of Bessbrook and the surrounding area can expect. This will exacerbate disadvantage, poverty and exclusion.

The Strategy offers inadequate opportunities for rural employment and services. There is a significant difference in "urban" and "rural" planning policies, yet the Draft Plan Strategy purports to provide generous provision for economic development at a choice of locations. With little to no provision in Bessbrook, the Draft Plan Strategy will have a negative impact upon the settlement of Bessbrook and surrounding rural hinterlands. Had Bessbrook been upgraded in the settlement hierarchy, there may have been greater opportunity for new economic development zonings.

The Draft Plan Strategy does not strike the appropriate balance between achieving sustainable development and the need to protect and preserve the "open countryside". There is inadequate provision for rural business in Bessbrook, and employment opportunities will be too limited.