



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	<input type="text"/>		
First Name	<input type="text"/>	Last Name	<input type="text"/>
Address	<input type="text"/>		
	<input type="text"/>		
	<input type="text"/>		
Email	<input type="text"/>		

Q3 Did you respond to the previous Preferred Options Paper?

- ☐ Yes ☒ No ☐ Unsure

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

Address	<input type="text"/>		
	<input type="text"/>		
	<input type="text"/>		
Town	<input type="text"/>	Postcode	<input type="text"/>

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.

Please refer to attached report for full details.

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)

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)

CE2 & CE4 (Please refer to attached cover letter)

(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.

Please refer to attached report

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.

Please refer to attached report

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?

Please refer to attached report

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

Do you have any comments on the SA?

N/A

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 designworks studio

Our ref: 1482

19th September 2025

Your ref:

Local Development Plan Team
Planning Office
Downshire Civic Centre
Ardglass Road
Downpatrick
BT30 6GQ

RE: Draft Plan Strategy Public Consultation representation

Public Consultation Closing Date: 22nd September 2025

Subject Lands Location: Lands approximately 50m Northeast of No. 1 Skerriff Court, Cullyhanna, BT35 0JG

Dear Local Development Plan Team, on behalf of my Client [REDACTED], I welcome the opportunity to make a submission to the draft Plan Strategy. A twelve-week consultation period for the Newry, Mourne and Down Local Development Plan Draft Plan Strategy will commence on Friday 27 June 2025 and close at 5pm on Monday 22 September 2025.



Introduction and Instruction

This submission is made on behalf of [REDACTED], a landowner with lands immediately adjacent to the current settlement development limit of Cullyhanna.

It is made in response to the public consultation on the Draft Plan Strategy (DPS), the first stage in the preparation of the Newry, Mourne and Down Local Development Plan (LDP) 2035. The submission challenges the adequacy of the housing provision for Cullyhanna within the draft Plan Strategy and requests the inclusion of the subject lands within the settlement boundary.

The representation sets out the policy and evidence-based rationale for this modification, drawing upon the Council's own Technical Supplement 2: Housing (June 2025) and relevant regional planning policy. It demonstrates that the settlement as currently framed within the DPS lacks sufficient housing allocations, fails to respond to identified local and district-wide housing needs, and does not satisfy the statutory tests of soundness.

It is respectfully requested that my client's lands be included within the settlement boundary to provide a logical, sustainable, and deliverable housing allocation that directly contributes to the Council's housing strategy.



Policy Context

The regional and local policy framework provides a clear foundation for this representation. The Regional Development Strategy (RDS 2035) emphasises the need to sustain rural communities and recognises the importance of smaller settlements in providing for balanced growth. Specifically, Strategic Guidance SFG 13 requires the sustaining of rural communities living in smaller settlements and the open countryside, while Regional Guidance RG 8 calls for the management of housing growth to achieve sustainable residential patterns with an adequate supply of quality housing.

The Strategic Planning Policy Statement (SPPS, 2015) reinforces this position, requiring local development plans to facilitate a managed release of housing land, to ensure a continuous five-year supply, and to promote compact forms of growth that support sustainable settlements. It also emphasises the importance of balanced communities and housing provision that responds to the full spectrum of needs, including affordable and social housing.

Planning Policy Statement 12 (PPS 12), although subsumed into the SPPS, remains relevant in highlighting the importance of directing growth to settlements in accordance with their role in the hierarchy and ensuring a mix of housing opportunities. At the local level, the draft Plan Strategy for Newry, Mourne and Down identifies Cullyhanna as a Tier 3 Village. These settlements are intended to function as service centres for their rural hinterland, sustaining schools, shops, and community facilities through appropriate housing growth.

“Our villages will be sustained, consolidated and revitalised and they will continue to perform a role as local service centres to meet the daily needs of the rural area and accommodate rural businesses and appropriately scaled residential development.”

However, the Draft Plan Strategy makes provision for only one uncommitted zoned site within Cullyhanna, CA03 Sheetrim Road, which extends to 0.87 hectares with an estimated capacity of 21 units. In the past three years, only four dwellings have been completed in the settlement. This level of provision is wholly inconsistent with the policy framework that requires Cullyhanna to be sustained as a viable and vibrant rural community.

Cullyhanna			
CA03	Sheetrim Road	0.87	21
Total		0.87	21

Table 1: Housing Monitor 2023 - Uncommitted Zoned Housing Sites by Settlement



Cullyhanna Settlement Profile

Cullyhanna is a small village, which lies on the main road between Newtownhamilton and Crossmaglen approximately 18 kilometres south west of Newry. The village lies to the west of the Ring of Gullion Area of Outstanding National Beauty (AONB). The character of this landscape provides a distinctive setting for the village. It is set in a landscape of rolling drumlins with broad areas of wetland, bog and attractive winding rivers in inter-drumlin hollows. The Cullyhanna River and its associated river corridor vegetation frame it to the southwest. To the north the settlement is bordered by a distinctive raised landform, which is visible from the southern part of the village. Lands to the west and east are generally more gently undulating.

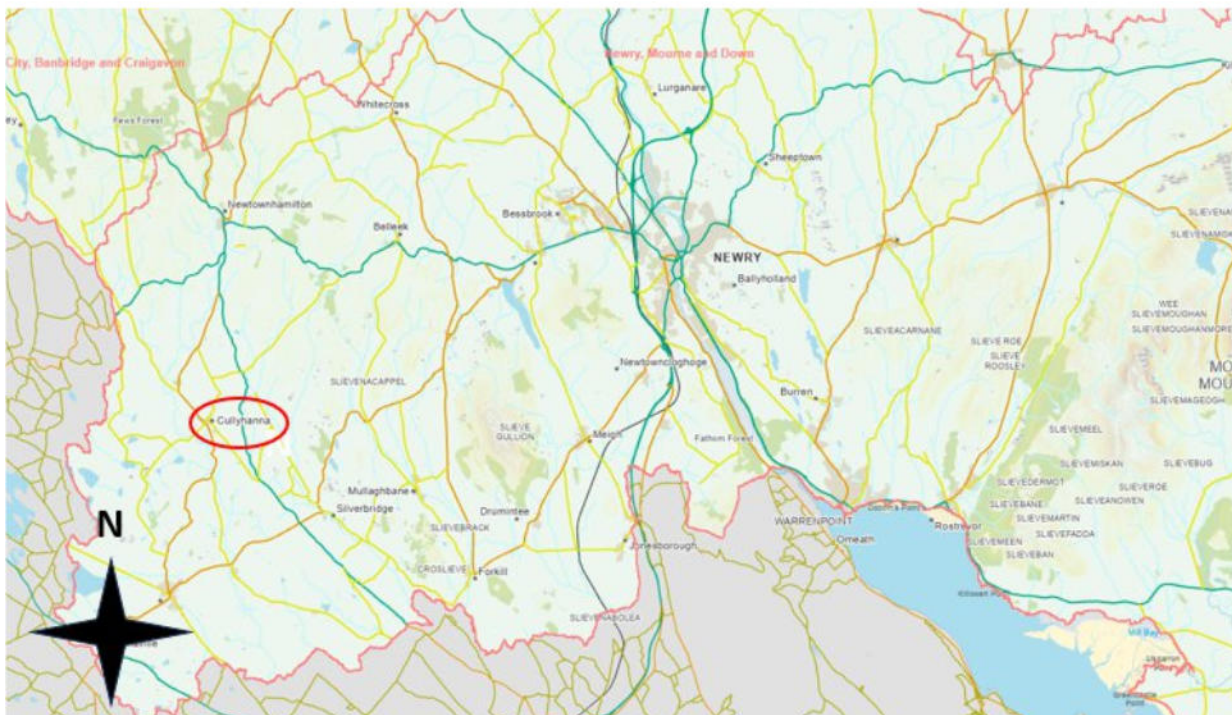


Figure 1: Site Location with NMDDC

Cullyhanna has a recorded population of approximately 326 persons at the 2021 Census. Notwithstanding, Cullyhanna's population has grown slowly but steadily over the last two decades (from 306 in 2001¹ to 345 in 2021). Growth is modest – roughly a 12.8% increase across 20 years – which aligns with its role as a small Tier-3 local service centre. The limited recent housing delivery as cited (four dwellings 2020-2023) suggests demand is constrained by available supply rather than absence of need. As such modest additional housing

¹ Cullyhanna - Dorsey Village Renewal and Development Plan Final Report September 2012



allocations would help maintain the village's services and allow natural, gradual population growth into the next plan period.

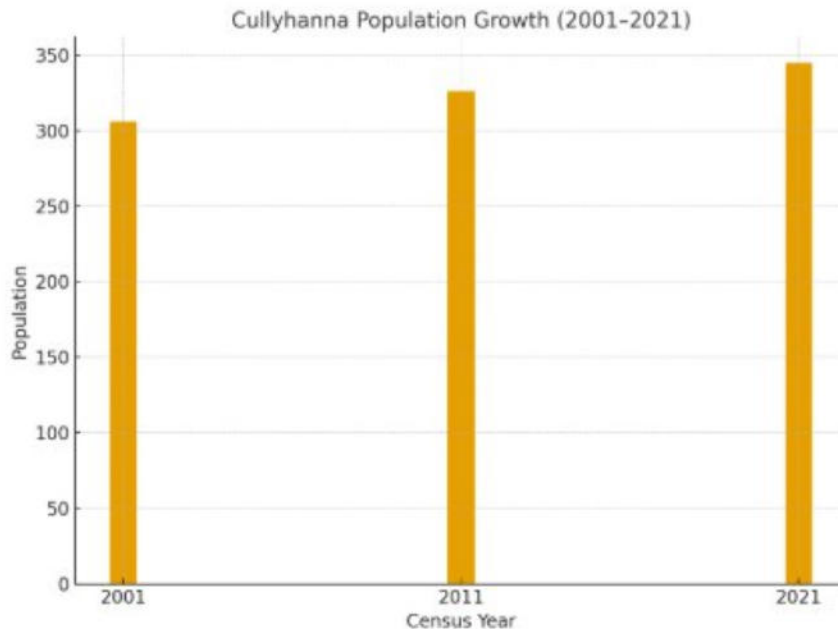


Table 2 Population growth of Cullyhanna Over 20 year period

Notwithstanding, despite its modest size, the village plays a valuable role as a local service centre. It contains a primary school, a convenience shop, a community centre, and an active GAA club, all of which are critical to the social fabric of the area. Cullyhanna also serves as a focal point for its rural locality, offering services that reduce the need for residents of the surrounding countryside to travel further afield. The Draft Plan Strategy places Cullyhanna in the Tier 3 category within the settlement hierarchy, reflecting this role. However, the village's capacity for housing growth has been severely limited by the minimal zoning proposed in the DPS.

According to the Council's Technical Supplement 2: Housing, only one uncommitted zoned site remains, with a capacity of 21 units. Between 2020 and 2023, just four new dwellings were completed in the settlement. This evidence demonstrates that Cullyhanna has not delivered housing at a scale sufficient to maintain its community role, and without further allocations, it risks stagnation.

Housing Evidence and Need



The housing evidence base assembled by the Council highlights significant unmet need across the district, with implications for rural villages such as Cullyhanna. As of March 2023, there were 3,885 applicants on the housing waiting list in Newry, Mourne and Down, of which 3,133 households were in housing stress. Importantly, 995 of these households were located in rural areas, representing nearly one-third of the total in housing stress.

This figure alone underscores the importance of ensuring that rural service centres such as Cullyhanna are enabled to accommodate new housing. The Northern Ireland Housing Executive's Commissioning Prospectus further identifies specific needs in neighbouring South Armagh villages including Cullaville, Forkhill, and Crossmaglen, where social housing requirements of 13, 19, and 63 units respectively are projected.

Although Cullyhanna is not explicitly listed, it falls within the same housing market area and it is reasonable to conclude that similar needs exist. Affordability pressures further compound the problem. House prices in Newry, Mourne and Down rose by 48.7 percent between 2019 and 2024, well above the Northern Ireland average of 27.5 percent. Private rents also increased sharply, rising by 42 percent between 2019 and 2023. These figures point to a housing market under considerable pressure, where demand is not being met by available supply. Against this backdrop, the DPS allocation of just 21 units in Cullyhanna is clearly inadequate to support the village's role or respond to the realities of housing need.



Soundness Assessment

The Draft Plan Strategy is unsound in its approach to Cullyhanna under several of the statutory tests of soundness set out in the DfI's Development Plan Practice Note 06 (2015).

Firstly, the Plan fails test CE2, as it is not founded on a robust and credible evidence base. The housing allocations for Cullyhanna rely solely on a single 0.87 ha site (CA03 Sheetrim Road), with an estimated capacity of just 21 dwellings across the entire fifteen-year plan period. This reliance is flawed for two key reasons:

- (1) it ignores delivery risks, such as landowner willingness, infrastructure requirements, or market viability, all of which may prevent the site from coming forward; and
- (2) it disregards past housing delivery trends in the settlement, which have been extremely low, with only four completions between 2020 and 2023. Taken together, this evidence demonstrates that the DPS approach is not credible, as it overestimates the likely contribution of the single site while underestimating the settlement's role and need.

Secondly, the Plan fails test CE4, as it does not provide sufficient flexibility to adapt to changing circumstances. Sound plans must be resilient and capable of responding to unforeseen issues such as delayed site delivery, infrastructure constraints, or changing patterns of housing demand. In Cullyhanna, no such flexibility exists. If CA03 does not deliver within the plan period, the village will experience no growth whatsoever, despite being identified as a Tier 3 Village with an explicit role in sustaining its rural hinterland. This lack of contingency exposes the Plan to unnecessary risk and undermines its ability to remain effective and responsive throughout the plan period.

Finally, the Plan fails test C3, as it is not consistent with regional planning policy. Both the Regional Development Strategy (RDS 2035) and the Strategic Planning Policy Statement (SPPS, 2015) emphasise the importance of sustaining rural communities through appropriate settlement growth. The RDS (SFG 13) specifically requires the strengthening of smaller settlements as service centres, while the SPPS requires Local Development Plans to facilitate compact and sustainable growth, maintain a continuous housing land supply, and ensure balanced communities. By allocating only one small site with very limited capacity, the DPS does not provide for the scale or flexibility of housing required to sustain Cullyhanna's community or to enable it to perform its designated role within the settlement hierarchy. This restrictive approach risks eroding the vitality and viability of the village, undermining local services such as the primary school, shop, and community facilities, which rely on a stable and growing population base.

In summary, the Draft Plan Strategy's treatment of Cullyhanna is unsound because it:

- Over-relies on a single site, ignoring delivery risks and past evidence of underperformance.



- Provides no flexibility, leaving the settlement entirely vulnerable if the allocated site fails to come forward.
- Conflicts with regional policy, failing to sustain a rural service centre in line with RDS and SPPS objectives.

By contrast, the inclusion of my client's lands within the settlement boundary would address these deficiencies by providing an immediately deliverable and modestly scaled housing opportunity that strengthens the evidence base, enhances flexibility, and ensures consistency with regional policy, thereby restoring soundness to the Draft Plan Strategy.



Subject Site

The application site comprises an irregularly shaped parcel of land fronting onto Cullyhanna Road, situated immediately adjacent to the existing settlement limit of Cullyhanna. The site is currently in agricultural use, comprising rough grass with areas of scrub and scattered vegetation. Levels across the site appear generally flat with a gentle rise moving northwards away from the roadside.

The roadside boundary is defined by a mature hedgerow with intermittent trees, providing a natural edge along Cullyhanna Road. The eastern and northern boundaries adjoin open agricultural fields, demarcated by traditional field hedgerows. The southern boundary abuts a small cluster of existing dwellings fronting Cullyhanna Road, forming a clear built edge to the settlement.

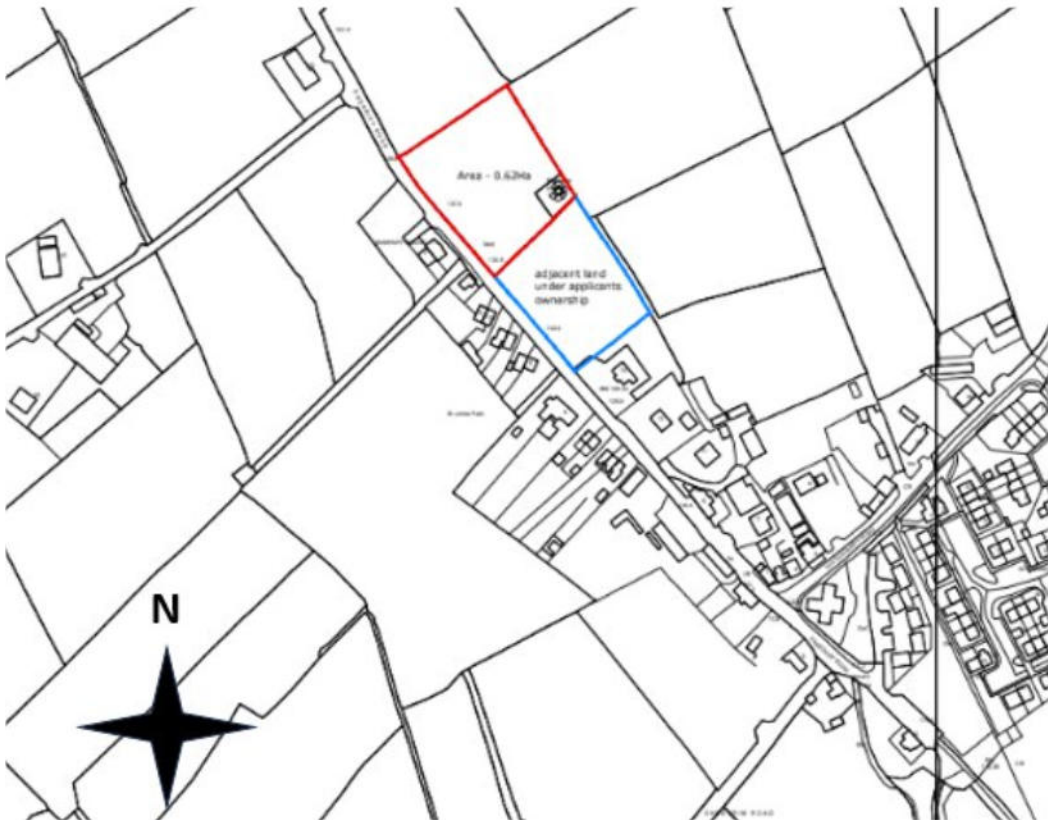


Figure 2; Subject Lands Outlined In Red

To the south of the site are detached and semi-detached dwellings forming part of the existing residential fabric of the village. To the north and east, the lands remain outside the settlement limit and are used for agriculture, reinforcing the site's role as a logical rounding-off of the settlement pattern. The positioning of



the site along the main road, immediately adjacent to established housing, ensures strong connectivity and integration with the existing built form of Cullyhanna.



Figure 3; Cullyhanna of the current Banbridge / Newry and Mourne Area Plan 2015

With regards to the current Settlement Limit, the subject site, as illustrated on Map No. 3/11 (figure 3) Cullyhanna of the current Banbridge / Newry and Mourne Area Plan 2015, is located immediately adjacent to and just outside the defined settlement limit of Cullyhanna.

The site is located on the north-western edge of Cullyhanna, fronting directly onto the local road network within the 30mph speed zone and adjoining established residential development inside the current settlement boundary. Although it is physically and visually integrated with the built form of the village, the site remains designated as countryside under the adopted Area Plan and is therefore constrained by more restrictive countryside policies rather than settlement-based provisions. Its immediate proximity to the existing boundary underlines its natural relationship with the settlement pattern and demonstrates that its inclusion would represent a logical, compact, and policy-consistent adjustment to the settlement limit.



Site Constraints

Flooding

A review of the site against the Flood Maps (NI), which include both Flood Hazard and Flood Risk Maps, confirms that the lands do not fall within any identified floodplain or area of potential flood risk. The absence of flooding constraints means the site is not subject to restrictions that could otherwise delay or prevent development. This provides a high degree of certainty regarding its suitability for housing and strengthens its deliverability within the early years of the plan period.



Figure 4: Subject site as per DFI Flood Maps (NI)



Archaeology and Heritage

A review of the site against the Historic Environment Map Viewer (NI), which records archaeological sites, historic monuments, listed buildings, and other heritage assets, confirms that the lands do not fall within or directly impact any identified heritage features. The absence of historic environment constraints ensures that development of the site would not give rise to adverse heritage impacts, providing further certainty regarding its suitability for residential use. This is fully consistent with the requirements of the Strategic Planning Policy Statement (SPPS, 2015), which emphasises the protection and conservation of the historic environment as a core planning principle. By demonstrating compliance with this regional policy objective, the site is reinforced as an unconstrained, sustainable, and deliverable opportunity for inclusion within the settlement boundary.



Public Utilities

With regard to Wastewater Treatment Works capacity in Newry, Mourne and Down, NI Water has introduced a new informative which provides clarity on both current and future capacity conditions. This informative sets out two key measures: the first relates to existing operational capacity and its impact on the ability to accommodate new sewerage connections; the second provides projected capacity outcomes based on prescribed growth factors applied to current drainage catchment flows. Together, these indicators allow for an accurate understanding of present infrastructure availability as well as forward planning for sustainable settlement growth.





Wastewater Treatment works	Current Planning Status	Estimation of Capacity based on Growth Factor			Comment
		10%	20%	30%	
Cullyhanna (WWTW)		⊖	⊖	×	
Key to Current Planning Status			Key to Local Development Planning		
	New connections permitted - Capacity Available			✓	Works has 'Reasonable Capacity'
	Restriction on new connections - Capacity Limited			⊖	Works is 'At or reaching Capacity'
	New connections refused - No Capacity			×	Works has 'Insufficient Capacity'

Figure 5: Status and Capacity of Wastewater Treatment Works (June 2024)

Accordingly, the subject site is demonstrably suitable for new development in terms of wastewater infrastructure. NI Water's assessment of Wastewater Treatment Works capacity confirms that Cullyhanna currently has available capacity and is accepting new connections (Appendix F, Technical Supplement 9 - Telecommunications and Public Utilities). This means that the existing network can accommodate additional development without exceeding treatment limits or placing pressure on infrastructure. The availability of wastewater capacity removes a barrier to delivery and provides certainty that the site can be readily serviced, reinforcing its suitability for inclusion within the settlement boundary.



Surrounding Context

It is relevant to note that lands directly southeast and adjoining the subject site benefit from extant planning permission for a residential scheme comprising six semi-detached dwellings and one detached dwelling with associated site works (Planning Ref: LA07/2019/0779/F, approved on 4 July 2022 subject to 15 conditions). A subsequent revised application has since been submitted, seeking to reduce the approved scheme from seven to five dwellings, and this is currently under consideration.

This established planning history demonstrates the suitability of the area for housing and reinforces the logic of extending the settlement boundary to include the subject lands as part of a coherent and sustainable pattern of growth.

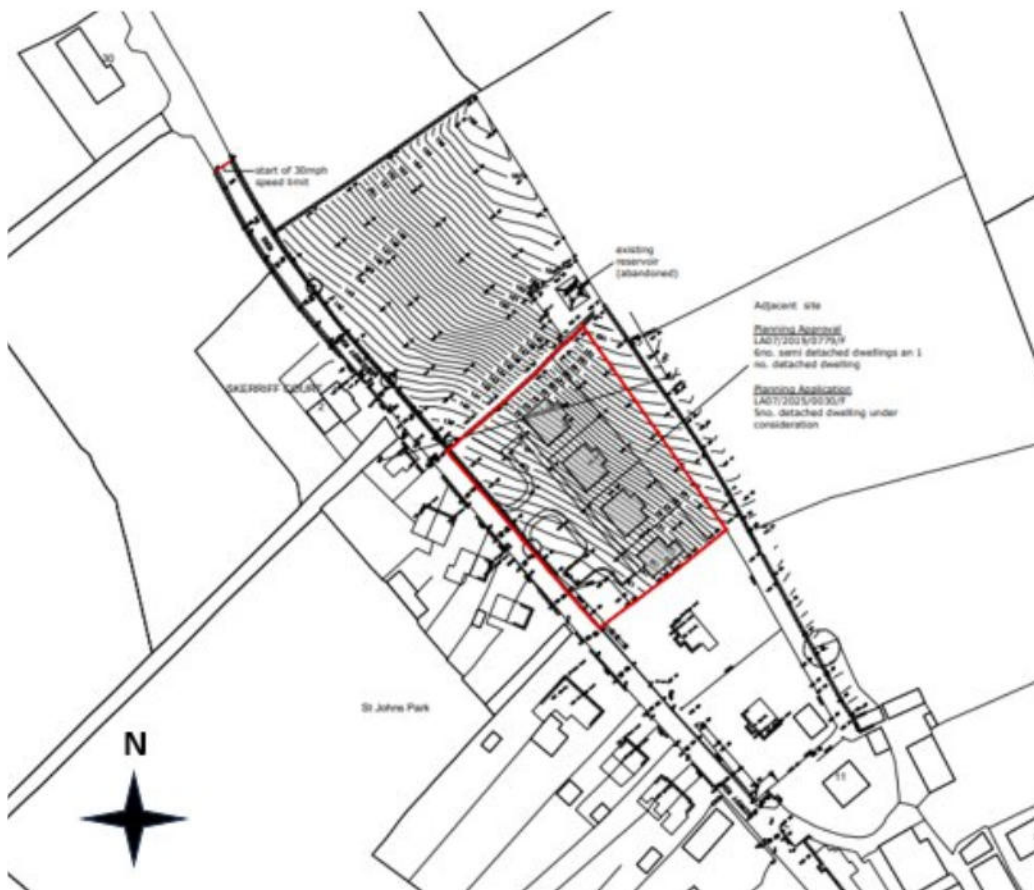


Figure 6: Existing Site Layout



Planning Merits of Inclusion

The Draft Plan Strategy sets a target of providing approximately 11,000 new homes by 2035, across a mix of housing types, sizes, and tenures in accessible locations. The inclusion of my client's lands within the settlement development limit of Cullyhanna would deliver multiple planning benefits, contributing directly to achieving this objective in a sustainable and logical manner. The site would enable a compact and well-contained expansion of the village, rounding off the existing settlement pattern in a way that avoids sprawl and reinforces defensible boundaries. Its location within easy walking distance of key local facilities, including the primary school, convenience shop, and community amenities, ensures that future residents would be well connected and supported by existing infrastructure.

As illustrated in the concept layout plan below, the subject site could easily accommodate 4 detached dwellings while fully respecting the surrounding character, scale, and densities. This modest level of provision represents a meaningful contribution to housing supply within Cullyhanna, consistent with its role as a Tier 3 Village, while remaining entirely in keeping with the village's scale and character. The lands are in single ownership and are available for immediate development, meaning they are capable of delivering housing within the first five years of the plan period, enhancing both the deliverability and the soundness of the Draft Plan Strategy.



Figure 7: Indicative Site Layout

Furthermore, the site is unconstrained in terms of key environmental and infrastructure considerations. A review against the Flood Maps (NI) confirms that the lands are not within any identified flood hazard or risk area. Similarly, assessment via the Historic Environment Map Viewer (NI) confirms that the site does not overlap or directly affect any recorded archaeological sites, historic monuments, listed buildings, or other heritage assets. In terms of road safety, the site is located within the 30mph speed limit, with sight lines readily achievable for safe access. Taken together, these factors demonstrate that the site is deliverable, environmentally unconstrained, and suitable for inclusion within zoned housing lands, providing a practical opportunity to support sustainable growth in Cullyhanna while fully aligning with regional planning policy and the objectives of the Draft Plan Strategy.



Requested Modification

In light of the evidence presented, it is respectfully requested that the settlement development limit of Cullyhanna be amended to include my client's lands at c. 50m Northeast of No. 1 Skerriff Court, Cullyhanna for housing purposes. This modification is necessary to ensure that the Draft Plan Strategy provides a credible, flexible, and deliverable housing supply capable of meeting both current and projected housing demand within the settlement. Including these lands would allow Cullyhanna to fulfil its role as a Tier 3 Village, sustaining its function as a rural service centre that supports local schools, shops, and community facilities, while also helping to maintain the vitality and resilience of the wider rural hinterland.

The inclusion of the site would contribute to addressing rural housing stress and affordability pressures, which have been demonstrated through both the Council's evidence base and wider market indicators. Furthermore, this amendment would ensure that the Plan aligns with regional planning objectives set out in the RDS and SPPS, including the promotion of sustainable settlement patterns, the compact and logical expansion of villages, and the protection of environmental and infrastructure resources. The site represents a logical, well-contained extension of the settlement, rounding off the village and reinforcing defensible boundaries, while providing housing that is immediately deliverable and capable of being serviced without additional constraints.



Conclusion

The Draft Plan Strategy, in its current form, significantly underestimates the housing requirement for Cullyhanna and fails to provide a sufficiently robust framework for the village to maintain its role as a rural service centre. With only a single uncommitted site zoned for 21 units and just four dwellings delivered in recent years, the settlement is at real risk of stagnation, which would undermine the sustainability of local services, community facilities, and the social fabric of the village. This limited provision is inconsistent with regional planning policy, including the RDS and SPPS, which require local development plans to sustain rural communities, provide a flexible housing supply, and facilitate a mix of housing types and tenures to meet identified needs. By contrast, my client's lands offer a sustainable, immediately deliverable opportunity to provide new housing that complements the existing settlement pattern, integrates with surrounding development, and can be delivered in the early years of the plan period. Their inclusion would enhance the flexibility, robustness, and soundness of the Draft Plan Strategy, ensuring it is capable of meeting housing needs, supporting balanced communities, and withstanding independent examination, while securing the long-term vitality and resilience of Cullyhanna and its surrounding rural area.

Kind regards,

[Redacted Signature]