



# 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

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<br>(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.

The draft plan strategy has been prepared to meet the tests of soundness as set out in the DFI Development Plan Practice Note 6: Soundness (version 2, May 2017). The draft plan strategy insofar as it relates to the strategic allocation of land for economic development and its strategic and operational policies for economic development is regarded as sound because it meets the various tests of soundness as summarised below:

Procedural Tests P2 and P3.

.Consistency Tests C1,C2,C3 and C4.

Coherence and effectiveness tests CE1,CE2, CE3 and CE4.

## 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).

|                                     |                                                             |
|-------------------------------------|-------------------------------------------------------------|
| <b>Relevant Policy number(s)</b>    | Economic Development in the Countryside Policy ED2 and ED4. |
| <i>(and/or)</i>                     |                                                             |
| <b>Relevant Section/Page Number</b> | Pages 225 and 229.                                          |
| <i>(and/or)</i>                     |                                                             |
| <b>Proposals Map</b>                |                                                             |

**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.

N/A

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.

N/A

## 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?

No

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

Do you have any comments on the SA?

No

## 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:



Gervaise Mullan  
 46, Chancellor's Road,  
 Newry,  
 Co. Down,  
 BT35 8PU

Local Development Plan Team  
 18/09/2025

Newry, Mourne and Down District Council

Downshire Civic Centre

Downshire Estate, Ardglass Road

Downpatrick BT30 6GQ

Dear Sir/ Madam,

In addition to the Draft Plan Strategy Representation Form duly completed and attached we wish to make this additional submission in relation to the expansion of Zoning NY 69 Industrial Lands adjacent to the existing Chancellors Road site.

The Strategic Planning Policy Statement (SPPS) 2015 highlights that a fundamental role of the Local Development Policy (LDP) is to ensure there is an ample supply of suitable land available to meet economic development needs within the plan area. The Regional Development Strategy (RDS) provides a three stage employment land evaluation framework through which this can be achieved. To inform stage 1 {taking stock of the situation} the council appointed CBRE to complete an audit of existing workspace availability throughout the district. CBRE considered there is a lack of larger warehouse units available and that larger warehouse / Industrial units are needed in Newry to attract new and expanding businesses to the area.

In the CBRE NI executive summary 2025 also commissioned by Newry, Mourne and Down District Council (NMD) under paragraph 1.1.1 Industrial Market they state "there is currently no new build warehousing being marketed within the NMD council area". Furthermore under paragraph 1.1.4 concerning undeveloped land recommendations they state "it would be our opinion more land should be zoned at the appropriate time in the LDP process in the prime locations where land has been developed over the past three years". The land within NY 69 is presently being developed by Savage and Whitten and we respectfully submit that given the CBRE recommendations consideration ought to be given to expand this zoning along the Chancellors road and the Carnagat Lane.

In addition under section 3 of their report entitled Industrial Land Commentary paragraph 3.6 it states "the market is in effect being held back by the lack of new space coming to the market for all business sizes. We would suggest that larger accommodation is needed to support companies and to attract new occupiers. Within the area there are currently no larger developments being marketed on a design and build basis, which is a concern considering the amount of zoned employment land

and also detrimental when trying to attract new occupiers to the district. Further consideration should be given at the appropriate plan stage.”

In addition under section 6 Land use Commentary CBRE NI state “Having reviewed the update of land developed from the previous report and the UUEPC report (Employment space demand 2022-2035), more employment land will be required in order to meet forecasts contained in the Lichfield Review of Employment Strategy.

CBRE NI have colour coded sites with green being prime lands which they feel would be suitable for development and a strong market for. We wish to highlight and draw your attention to their summary of Employment lands under 6.1, specifically the Chancellors Road site (zoning NY 69) Besides being coloured green the CBRE recommendation states “considering the ease of access to the dual carriageway from this location we would believe this is a prime Industrial area within Newry. Infrastructure upgrading required. Land fit for purpose subject to access.”

By way of an update on these lands, following the purchase of a portion of these lands by Savage and Whitten Wholesale planning approval was obtained under planning reference LA07/2022/1168/F and works are at an advanced stage on site. Accordingly we can confirm that the Key Site Requirements of Zoning NY 69 Economic Development Chancellors Road have already been completed. The most notable of these requirements states “The Chancellors Road will be realigned and widened to agreed standards along the frontage of the site and from the site extremity to the proposed new link from Chancellors Road to the A1 upgrade.” In addition concerning another update on these lands, Planning approval was also obtained under planning reference LA07/2022/1357/O by O’ Hagan Property LTD. This permission involves realignment and widening of the Carnagat Lane which will ultimately allow the expansion of the NY 69 zoning into our adjacent Lands. These lands were the subject of a site specific representation at the previous Independent Examination at which the Planning Appeals Commission commented under paragraph 3.1.104 “objection site 227 North of Carnagat Road is little different from the adjacent NY 69 zoning ..... Despite the site’s proximity to infrastructure, its accessibility and being as developable as NY 69, the land is not needed for economic development at this time .” Given the current need for more land to be zoned for employment purposes one can conclude that as part of this current LDP process this parcel of land ought to be included in an expansion of the NY 69 zoning. Please refer to the attached map.

To reinforce this proposal in their conclusion in Paragraph 6.2 CBRE NI state “our view would be that additional lands should be zoned in areas such around the existing green category areas such as Newry at the Local Policies Plan Stage. “

A clear endorsement of our contention that the Chancellors Road NY 69 zoning should be expanded is reiterated by CBRE NI in section 10 of their prime sites commentary relating to Newry Industrial Lands where they state “taking consideration of the Ulster University employment space demand report 2012-2035 and our property market knowledge we are of the opinion that there should be a heavy focus on industrial /warehouse development within the NMD area. Areas such as the individual lands at Carnbane and those areas directly of the A1 are ripe for development for services, manufacturing and storage and distribution companies.”

In conclusion we agree wholeheartedly with the CBRE update 2025 of the baseline evidence contained within the Employment Land Supply for Newry, Mourne and Down District Council. The most significant elements of the update included the following findings:

- There is limited availability of warehouse / industrial space within Newry, Mourne and Down District Council, with no new build warehousing being marketed within the council area.
- More land should be zoned at the appropriate time in the LDP process in the prime locations where land has been developed over the past 3 years.
- The Invest NI land holding has reduced considerably in the last 4 years.
- In the last 5 years demand for industrial warehouse space throughout the UK including Northern Ireland has increased considerably partly due to the surge in online sales.
- There should be a heavy focus on industrial / warehouse development within the NMD District.
- Newry has seen a good level of development of new warehouse units for owner occupiers within the Carnbane area over the past 3 years.
- In this post Brexit era, cities like Newry have the potential to be a landing pad for numerous companies who trade between the UK and Europe, however this depends on a suitable product being available.

This LDP should in light of the above, zone extra land around NY 69 for economic development over the plan period to ensure it offers a range and choice of units in terms of size to promote flexibility and provide for the varying needs to different types of economic activity. Account should also be taken of factors such as accessibility by all members of the community, connectivity with the transportation system, the availability of adequate infrastructure, the specialised needs of specific activities, potential environmental impacts and compatibility with nearby uses including the operational requirements of existing or approved economic development. The expansion of zoning NY 69 already ticks all these boxes,

Yours Faithfully,

[Redacted Signature]

Commented [tm1]:

Commented [tm2]:

Commented [tm3]:



# NMDDC Local Developme

NMD-DPS-047

extension to  
ny 69 zoning

