



# 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	Seamus	Last Name
Address	11 Loughinisland Road	
	Loughinisland	
	Downpatrick	
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		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.

No - see supporting submission

## 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)

(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.

See attached submission

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.

See attached submission

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

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

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:

# **NEWRY MOURNE & DOWN LOCAL DEVELOPMENT PLAN 2035**

**Representations to Draft Plan Strategy**

**Lands at Ardanbannon House,  
Annsborough**



Ardnabannon  
LDP Reps  
Final  
September 2025



## LDP Submission

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## 1. INTRODUCTION

- 1.1 This representation has been prepared by Fay Planning Consultancy 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 27<sup>th</sup> June 2025.
- 1.2 This representation relates to the historic environment strategy, and to the relevant proposed strategic and operational policy in that regard.
- 1.3 It relates to the settlement of Annsborough and to land that is not currently within settlement limits under the terms of the Ards & Down Area Plan 2015 (see Appendix 1). The subject lands comprise the historic environment asset that is Ardnabannon House. This submission responds to the relevant strategy and policy considerations set out in the DPS with particular regard to the settlement and site-specific interests.
- 1.4 The consideration of the Council proposals and the preparation of this response to that proposal has taken account of relevant background documents that are material to the consideration of this matter.

## 2.0 ANNSBOROUGH VILLAGE & ARDNABANNON HOUSE

### Ardnabannon House

- 2.1 Ardnabannon House is located at Ardnabannon Road, in the townland of Ballybannon, Annsborough. The House dates from c. Mid-1860's and is B1 Listed. It is significant individually and as part of the group of buildings that contribute to the historic character, industrial and architectural heritage of the former Mill village within the wider surrounding area.
- 2.2 Ardnabannon House can best be understood in the context of the evolving village of Annsborough through its connections with the linen industry and in particular the significant contribution of the Murland family in the growth of the mill village. William and James Murland were the sons of a Portaferry tanner and acquired bleach greens in the village of Annsborough around 1800.



**Figure 1: Annsborough Historical Mapping 1832-46**

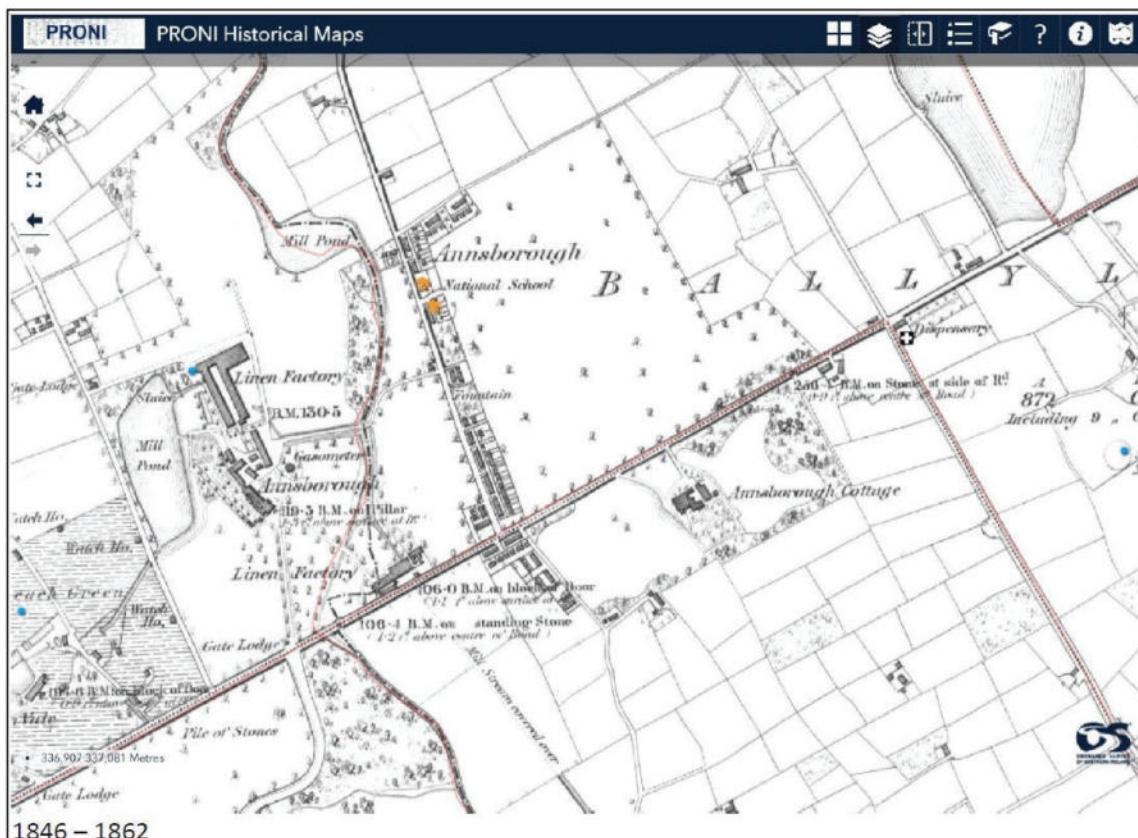
- 2.3 Annsborough developed as a mill village in the valley of the Clarkhill and Ballybannon. Ample water supply that came from a stream fed by the lake in Lord Annesley's demesne. A mill and 2 bleaching greens were established and aligned with the earliest developments in powered spinning mills, and a further mill was constructed around 1826. The Murland family established the Annsborough Primary School in 1835.
- 2.4 The Murlands and the Steele families dominated the production of linen in Annsborough and by 1840 there were three hundred workers in the mills and Murlands also gave employment to about seven hundred hand loom weavers, who worked in their homes within the locale.
- 2.5 William Murland established a new bleach green near the top of the hill and adjacent to

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Castlewellan, where he also built his house Wood Lodge. His younger brother James lived in Annsborough House at the bottom of the steep hill on the road from Castlewellan to Clough and close to the mills which were established for the spinning of linen yarn. James Steele lived in Greenvale House.

2.6 James Murland was chiefly responsible for the great expansion of the Murland business during the mid-nineteenth century. James married Jane Dobbin, eldest daughter of Clotworthy Dobbin of Belfast in 1844 and had five sons. In the early days of his marriage, he lived in Annsborough Cottage which is close to the village of Annsborough, but on the opposite side of the road from the linen factory and bleach green, on the site of Ardnabannon (see Figure 2 below). James died in 1850 and was succeeded in the linen business by four of his five sons, two of whom, Henry and William, continued to live in Annsborough House.

2.7 The village had 2 mills, and the industry provided employment for very significant numbers of residents and the wider local rural community as noted in the development of the school and mill cottages along Ballylough Road from Figure 1 to Figure 2. The family acquired and lived in various properties in the village. James Murland was chiefly responsible for the great expansion of the Murland business during the mid-nineteenth century.

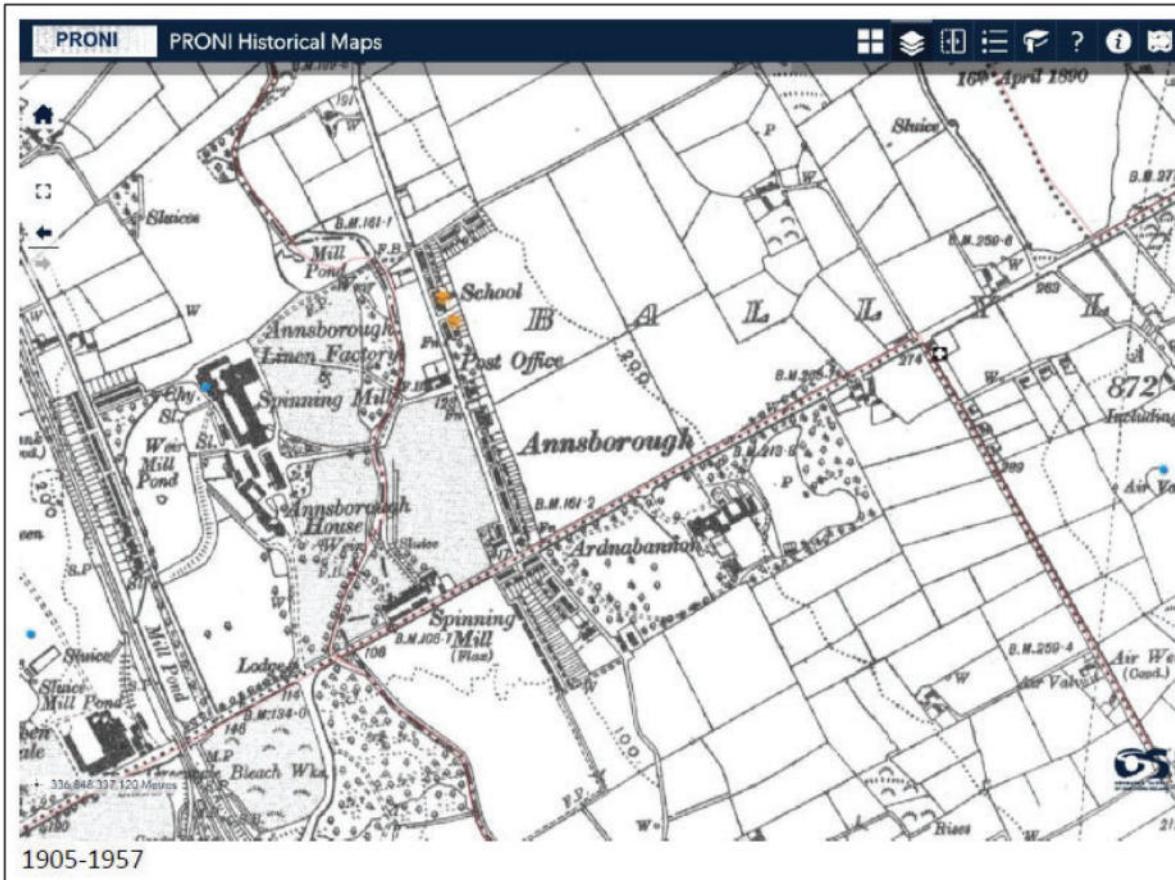


**Figure 2: Annsborough Historical Mapping 1846-62**

2.8 Charles Murland (1820-87), James Murland's youngest son, is suggested to have commissioned the Architect Thomas Turner in the late 1850s to build a new house on the Annsborough Cottage site and this was completed about 1868 being named Ardnabannon House. Charles Murland was succeeded by his son, Clotworthy Warren Murland, JP, who married Sarah, a daughter of the linen manufacturer Thomas Ferguson of Banbridge. He lived in Ardnabannon House until his death in 1903. James Warren Murland succeeded his father

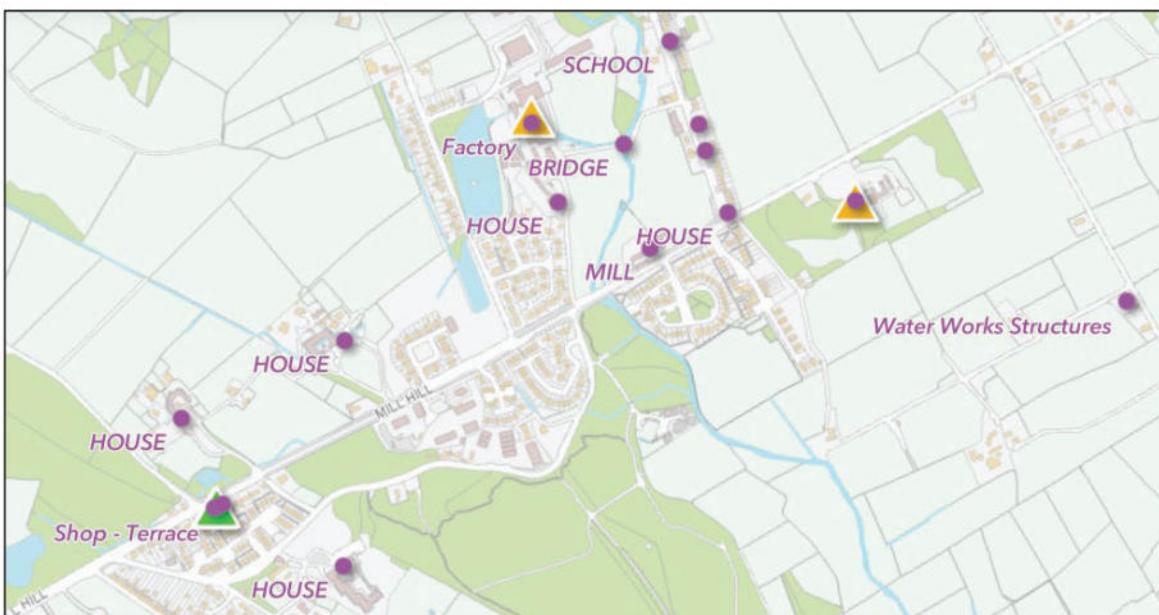
## LDP Submission

in the business and continued to live in Ardnabannon House.



**Figure 3: Ardnabannon and related development Historical Mapping 1905-57.**

2.9 This rich heritage is reflected in the number of listed buildings present within and around Annaborough village. Ardnabannon House is at the centre of that heritage story.



**Figure 4: Listed Buildings & Heritage at Risk**

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- HB18/11/040: Ardnabannon House Ardnabannon Road, B1
- HB18/11/043: 1 Ballylough Road, House, B1
- HB18/11/44a: 37 Ballylough Road, House, B2
- HB18/11/44b: 35 Ballylough Road, House, B2
- HB18/11/045: Annsborough School, B1
- HB18/11/050: The Old Mill, B1
- HB18/12/021: Standard Mill (1840-1859), B1
- HB18/12/022: Bridge & Watch Chamber, Annsborough Factory, B
- HB18/12/023: Greenvale, Clarkhill, B
- HB18/12/024: Annsborough House, B1
- HB18/12/002: Wood Lodge, Clarkhill, B+
- HB18/12/025A: 65 Mill Hill Shop 1820-39, B2
- HB18/12/025B: 65 Mill Hill House 1820-39, B2
- HB18/12/025C: 65 Mill Hill House 1820-39, B2
- HB18/12/026: Corriewood House, B2
- HB18/12/041: Water Attendant's House, 25, Ballybannon Road, B1

2.10 After the First World War, the company, like so many linen firms encountered difficulties and by 1930 both the old mill and the new mill had closed. Finally in 1937, James Murland Ltd was acquired by the Ulster Weaving Company who were seeking new bleaching premises, and after James Murland's death in 1943 Sir Graham Larmor and his family moved into Ardnabannon House.

2.11 In 1967 the house was purchased by the Down County Education Committee and converted to an Outdoor Pursuits Centre opening in 1968. Ardnabannon was re-opened as Ardnabannon Outdoor Education Centre in 1994 by the South-Eastern Education and Library Board. During the tenure of the Board the house was subjected to a number of interventions by way of alterations and extensions.

2.12 Ardnabannon has lain vacant since the 2017 when the SEELB vacated the premises. The historic asset, along with the Standard Mill, have been registered on the Heritage at Risk Register. Since 2019 and 2017 respectively.

### 3.0 DPS BUILT HERITAGE STRATEGY & SETTLEMENT LIMITS

3.1 The DPS Historic Environment recognises that: “*the Historic Environment represents an invaluable resource which allows us to understand the past and provides the context of the present. Archaeological and historic environment assets are often key landmarks within our towns and countryside. The historic environment is a non-renewable resource as once it is lost, it can never be replaced. It enriches our quality of life and provides distinctive character and a uniqueness to our city, towns and countryside which cannot be replicated.*”

3.2 The Council Corporate Plan 2024-2027 and the Community Plan – Living Well Together. We recognise that the DPS high level objectives reflect the importance of the protection, conservation and enhancement of the rich heritage assets. We endorse the DPS position that:

- They contribute to the distinctive character and local distinctiveness of the district’s city, towns, villages, small settlements and countryside, creating a strong sense of place, enriching the lives of the district’s inhabitants by providing vibrant and sustainable places and communities.
- They provide opportunities for tourism, attracting visitors to the district and in turn promote economic development and investment.
- They provide opportunities for recreation and enjoyment and promote greater health and wellbeing to those that experience them.
- The district’s heritage assets promote education and provide a greater understanding of the district’s past through to the present and must be protected for the benefit and understanding of future generations.

3.3 We also 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.

3.4 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.

3.5 Our clients have no difficulty, in principle, with the approach that such policy should be geared towards the ensuring that the essential character and special architectural or historic interest of the building and its setting are respected as we recognise that the heritage value of the asset is paramount. However, these stringent requirements do have a significant cost associated with them which impacts on the economic viability of schemes aiming to protect, conserve and enhance Listed Buildings.

3.6 Policy HE15 makes provision for enabling development ‘*as a last resort where the long-term public benefit of securing a significant place decisively outweighs the disadvantages of departing from normal policy presumptions.*’ The detailed provisions reflect those of Planning Policy Statement 23, and it is acknowledged that the DPS seeks to cover situations where enabling development is the only option left to enable delivery a scheme that will secure the long-term conservation of the historic asset. 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.

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3.7 This DPS provides an opportunity to deliver a positive and sustainable outcome for Annsborough and the wider district. In its regional objectives, the RDS seeks to promote a coordinated and sustainable approach. Under RG4, promoting a sustainable approach to the provision of tourism infrastructure recognises the significant role heritage assets can play in promoting the 'sense of place'. Under RG6 – Strengthening Communities, it is stressed that the '*right environment can help strengthen community cohesion, foster a stronger community spirit and increase our sense of place. The village concept is important for both rural and suburban areas as it can bring people together and strengthen communities by sharing a sense of place and identity.*' 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.*'

3.8 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 take into account in the preparation of LDPs and carrying out of their development management functions. (emphasis added).*

3.9 As set out in section 2 of this submission, Ardnabannon House is central to the story of the development of Annsborough as a mill village. It is linked to numerous other heritage assets including the mills and the school as well as Wood Lodge, Annsborough House and Corrie Wood House. All of these assets are located in relative close proximity. However, all of those other assets are within the settlement limit of Annsborough village and development projects to safeguard and enhance the assets can, under currently prevailing and draft policy, avail of a wide range of development options, subject to compliance with the relevant operation policies.

3.10 Ardnabannon House is at risk and needs a timely and appropriate intervention to secure its longer-term future as a heritage asset. Our clients are committed to delivering that intervention. It is in accordance with the LDP objectives for sensitive re-use of an important heritage asset and in line with the recognition by the DPS that tourism is one vehicle for the conservation of such assets and in the promotion of economic development and investment. It is inevitable that the work required to deliver a long-term sustainable future for Ardnabannon House will render any proposal to be not economically viable and will trigger a need for an appropriate quantum of enabling development, which is likely to give rise to significant uncertainty in respect of delivery. The welfare of the heritage asset in distress is at the heart of enabling development cases and it is acknowledged that enabling development cases can be complex and require a considerable period of time to be resolved to all parties' satisfaction. The key concern, in that context is that the longer it takes to find a solution, the more the asset will deteriorate and the higher the costs of repair will be which has a knock-on effect for the quantum of development required.

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3.11 Under Strategic Policy SETT2, the DPS proposes that the current Settlement Development Limits within the BNMAP 2015 and ADAP 2015 will remain in place until such time as they are reviewed and adopted in the Local Policies Plan. It confirms that the review will involve a detailed analysis of the settlement roles and functions, environmental issues, availability of services, community facilities, infrastructure and spare capacity, taking into account current development pressures and constraints. However, the DPS could adopt a more progressive and integrated approach, as suggested by the RDS and the SPPS by formally recognising the heritage of the mill village in a strategic way and developing a policy to encourage and promote the conservation and enhancement of that asset and the sense of place associated with it. That would involve incorporating Ardnabannon and its grounds within the settlement limit, in recognition of its integral role in the development of the village, with appropriate policies to ensure that only development that complies with HE6 and HE10 will be approved.

3.12 Such an approach provides the Council with more control over the impact of any such development on the spatial strategy, in contrast to the HE15 enabling development option where the outcome and impact on the spatial strategy and associated allocations is unknown until such times as any application has been determined.

3.13 In that context the approach currently proposed, while in broad terms following the approach of the RDS and SPPS, it does not take appropriate account of the direction in both documents that encourages an integrated approach, placing proper emphasis on the role of built heritage assets in the wider context of the sense of place and community they create. In that context the proposal is 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.

## 4.0 CONCLUSIONS

- 4.1 The current strategy and operational policy fails to meet the requirements to deliver on the RDS and SPPS objective in relation to consideration of built heritage assets in their wider context and, in particular, how they contribute to a sense of place.
- 4.2 In this instance there is a viable alternative that does not appear to have been considered.
- 4.3 It is an option that recognises the unique sense of place created by the historic development of the village of Annsborough and would provide a mechanism for more certainty in respect of the spatial strategy, and crucially more confidence in the delivery of a viable and much needed intervention to safeguard the future of an important heritage asset.
- 4.4 We respectfully request that the Council re-consider this proposal, taking account of the concerns raised in this submission. We would welcome the opportunity to discuss this further with the Council.
- 4.5 Our clients request that they are included in any inquiry process to discuss these matters further.



## APPENDIX 1: Subject Lands

Centre Point (Easting, Northing): 335849, 337149

3-5 ARDNABANNON ROAD, BALLYBANNAN, CASTLEWELLAN, BT31 9EN, 185780272

Plan No. 24010SE



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EDITIONS  
REV. DESCRIPTION  
BY DATE

PLANNING  
BUILDING CONTROL  
SECOND  
POLLUTION

PROJECT  
Ardnabannon House,  
Ardnabannon Rd, Castlewellan  
Ballybannan, BT31 9EN  
Location Plan  
DRAFT  
1:1250  
SITE AREA  
17,499.25  
BUILT UP  
OSNI  
DRAWING NUMBER  
3317-030-02-01-002

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