



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	Seamus	Last Name	Fay
Address	11 Loughinisland Road		
	Loughinisland		
	Downpatrick		
Email	seamus@fayplanningconsultancy.com		

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)

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)

SETT1

(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☐ 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:

NEWRY MOURNE & DOWN LOCAL DEVELOPMENT PLAN 2035

Representations to Draft Plan Strategy Derryboye Settlement Designation





LDP Submission

This page is deliberately left blank

LDP Submission

Contents

1.	INTRODUCTION	1
2.0	THE PROPOSAL TO DE-DESIGNATE DERRYBOYE.....	2
	Strategic Designation SETT1 Settlement Hierarchy	2
	Procedural Test P2.....	4
	Consistency Test C1.....	5
	Consistency Test C3.....	7
	Coherence & Effectiveness Test CE1.....	8
	Coherence & Effectiveness Test CE2.....	8
3.0	CONCLUSIONS	9

TABLES

Table 1: Derryboy PS Enrolment Numbers 2020-2025.....	6
---	---

APPENDICES

Appendix 1: Letter of Objection from Chair of Board of Governors Derryboy PS

Appendix 2: Letters of Objection from Local Residents

LDP Submission

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 27th June 2025. The representation specifically responds to the proposal to de-designate Derryboye from a small settlement to open countryside.
- 1.2 The consideration of the Council proposals and the preparation of this response to that proposal has taken account of a number of background documents that are material to the consideration of this matter:

2.0 THE PROPOSAL TO DE-DESIGNATE DERRYBOYE

Strategic Designation SETT1 Settlement Hierarchy

- 2.1 The draft Plan Strategy seeks to de-designate 4 small settlements - Carricknab, Derryboye, Drumaghlis and Tullyherron - to open countryside. The justification given is:

“As a result of changing circumstances in some rural areas, including the closure of local schools or businesses, some settlements which previously met the criteria for designation as small settlements can no longer justify this designation. Following a full review of existing settlements, Carricknab, Derryboye, Drumaghlis and Tullyherron have been declassified from small settlements to open countryside. Following an evaluation, it was not considered that these settlements exhibited a sufficient level of service provision or population to justify carrying them forward as small settlements. Upon the adoption of the Plan Strategy these clusters will be considered as open countryside.”

- 2.2 For the reasons set out below, it our considered view that the proposed change in the settlement hierarchy is unsound as the it fails the soundness tests in respect of:
- Procedural Test P2 – failure to take account of representations made to the Preferred Options Paper
 - Consistency Test C1 – failure to take account of the Regional Development Strategy
 - Consistency Test C3 - failure to take account of policy and guidance issued by the Department
 - Coherence & Effectiveness Test CE1 – failure to set out a coherent strategy from which its policies and allocations logically flow
 - Coherence & Effectiveness Test CE2 - failure to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

Procedural Test P2 – failure to take account of representations made to the Preferred Options Paper

- 2.3 Under ‘Options for Settlement Hierarchy, the Preferred Options Paper (‘POP’) indicated a proposal to re-examine the existing settlement hierarchy in order to consider if any settlement should be reclassified, considering the potential for identifying new small settlements and/or de-classifying small settlements where it was considered that they have no discernible service function or focal point for the rural community.
- 2.4 Representations made in relation to this proposal raised concerns that:
- the Council assessment of the settlements and findings were not made available for consideration; and
 - further cognisance be taken of the RDS Spatial Framework guidance as contained in SFG 13 and 14 relating to sustaining rural communities in small settlements and improving accessibility.
- 2.5 As addressed further below, the DPS does not set out any assessment of Derryboye as a small settlement and therefore does not follow through on commitments in that regard made in the POP Public Consultation Report of November 2019.

LDP Submission

- 2.6 Further the DPS does not take proper account of the issues raised in respect of compliance with RDS – SFG13 and SFG14.

Consistency Test C1 – failure to take account of the Regional Development Strategy

- 2.7 The RDS confirms that, for the purpose of its spatial framework those places outside the Principal Cities, the Main and Local Hubs are identified as constituting the rural area. It acknowledges that the recent growth in the rural community living in small towns, villages, and small settlements in the countryside, reverses a long-term trend of population decline. At paragraph 3.94 the RDS stresses that: *‘we must also strive to keep our rural areas sustainable and ensure that people who live there, either through choice or birth, have access to services and are offered opportunities in terms of accessing education, jobs, healthcare and leisure.’*
- 2.8 One of the 8 stated aims of the RDS is to support our towns and villages and rural communities to maximise their potential: *“Our rural areas including our towns and villages have a key role in supporting economic growth. They offer opportunities in terms of their potential for growth in new sectors, the provision of rural recreation and tourism, their attractiveness as places to invest, live and work, and their role as a reservoir of natural resources and highly valued landscapes.”* Therefore, in that context, while acknowledging the need to grow the population of hubs and clusters (SFG12), the RDS also emphasises (SFG13) the importance of sustaining rural communities living in smaller settlements and the open countryside as the distinctive settlement pattern of main and small towns, villages and dwellings in the open countryside is unique within these islands. *“The rural community is the custodian of our exceptional natural and built environment. In rural areas, the aim is to sustain the overall strength of the rural community living in small towns, villages, small rural settlements and the open countryside.”*
- 2.9 The RDS also recognises that there are wide variations across Northern Ireland in terms of economic, social and environmental characteristics of rural areas. The DPS fails to recognise these differences and does not reflect the RDS identified need to be sensitive to local needs and environmental issues including the ability of settlements and landscapes to absorb development. Key considerations will be the role and function of rural settlements and accessibility to services.
- 2.10 Derryboyne has previously been assessed as part of the Ards & Down Area Plan 2015 process. The Planning Appeals Commission (PACNI) Report (paragraph 9.23.1) contrasts Derryboyne to other suggested small settlements and sets out a number of common characteristics that contribute to the definition of a small settlement:
- “In our judgment, a small settlement should contain an appreciable number of buildings in close proximity to each other, displaying an obvious sense of cohesion and place and offering a range of community facilities. Furthermore, any agglomeration designated as a small settlement should offer potential for just small-scale infilling or rounding off of existing development.”*
- 2.11 Derryboyne fully meets these criteria, as further confirmed in the PACNI Report at paragraph 9.12.1, in that the land within the settlement limit would permit small-scale development appropriate for a settlement of this size and would facilitate infilling and rounding off of the settlement.
- 2.12 Derryboy Primary School is struggling to maintain enrolment at a level that will ensure its longer-term sustainability.

LDP Submission

School Year	Year 1 Intake	Year 7 Departures	Total Enrolment
2020/2021	15	6	61
2021/2022	17	8	66
2022/2023	10	5	63
2023/2024	12	3	75
2024/2025	20	9	87

Table 1: Derryboy PS Enrolment Numbers 2020-2025 (source: <https://www.education-ni.gov.uk/publications/school-enrolment-school-level-data>)

- 2.12 The Department of Education's Sustainable Schools policy states that primary schools should have at least 140 pupils in urban areas and 105 in rural areas to be sustainable. Derryboy Primary School, on current trends would appear to be a rural school at risk of closure unless those trends change reasonably soon. That would have a devastating effect on the Derryboy community and is contrary to the objectives of the RDS and the Strategic Planning Policy Statement (SPPS). As confirmed in the letter of objection from the Head of the School Board of Governors (Appendix 1), retaining Derryboy as a small settlement would be critical to sustaining the school.
- 2.13 A Queen's University Study¹ on the relationships between small rural primary schools and their communities in Northern Ireland drew the following conclusions:
- Small rural schools are also perceived to have similar strengths, most common being their strong relationship with the community, the low pupil-to-teacher ratio (ideal to meet children's individual needs), and the family-like environment where everybody knows and supports each other.
 - Small rural schools are a big part of their rural communities. Some are perceived to be 'at the heart of the community'. This can mean different things depending on the school, but they often are a 'meeting point' where people come together. Schools organise community events, share resources with different groups, and contribute to the economy of the area, among many other things.
 - The relationship between the school and the community was found to be a powerful, mutual, dynamic relationship, the intricacies of which depended on the historic, social and geographic context of the school itself. Bringing children to, working in, and attending the school were perceived as reinforcing a sense of belonging and pride to be part of that community.

¹ Bagley, C., & Fargas, M. (2025). Hollowing out communities: small rural schools in Northern Ireland and the threat of closure. In J. D. Johnson, & H. L. Harmon (Eds.), *Handbook on Rural and Remote Education* (pp. 461–474). Elgar. <https://doi.org/10.4337/9781035307722.00040>

LDP Submission

- Interviewees in the case study schools were dismayed at the prospect of losing the school, arguing that it would be the break-up/end of the community if that happened.
- 2.14 Retaining Derryboye as a small settlement is critical to ensuring that there is modest provision for new housing in the locality, of a scale that does not diminish the overall objective of the RDS settlement hierarchy and thereby sustain rural communities and critical services, including education, in line with the RDS strategic objectives.
- 2.15 The proposal to de-designate Derryboye from a small settlement to open countryside conflicts with the RDS strategic objective to encourage sustainable growth in small rural settlement in recognition of the critical role these settlements play in sustaining local communities, services and rural schools. In that context the proposal is unsound under the terms of the C1 consistency test.

Consistency Test C3 - failure to take account of policy and guidance issued by the Department

- 2.16 The Strategic Planning Policy Statement (SPPS) directs that, in preparing LDPs councils must take account of the RDS 2035, the Sustainable Development Strategy for Northern Ireland, the SPPS and any other policies or advice in guidance issued by the Department such as landscape character assessments.
- 2.17 The SPPS states that, in order to maintain and enhance the attractiveness of the countryside as a place to invest, live and work, the countryside requires a sustainable approach to new development, consistent with the RDS. The RDS recognises that to sustain rural communities, new development and employment opportunities are required which respect local, social and environmental circumstances. Facilitating development in appropriate locations is considered necessary to ensure proposals are integrated appropriately within rural settlements or in the case of countryside locations, within the rural landscape.
- 2.18 The SPPS stresses that Government policy recognises the wide variations in the economic, social and environmental characteristics of rural areas and requires that policy should be tailored to reflect these differences, be sensitive to local needs and sensitive to environmental issues, including the ability of settlements and landscapes to absorb development. The regional strategic objectives of the SPPS are to:
- manage growth to achieve appropriate and sustainable patterns of development which supports a vibrant rural community;
 - conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
 - facilitate development which contributes to a sustainable rural economy; and
 - promote high standards in the design, siting and landscaping of development.
- 2.19 Derryboye displays the development pattern of a small rural settlement, with a defined boundary, a coherent cluster of buildings, and a recognisable character. It is clearly distinct from open countryside. The retention of Derryboye as a small settlement offers opportunities for housing and further community development of a modest scale that is appropriate for the locality a settlement of this size through infilling and rounding off of the settlement, as accepted by the PAC Report referenced above. That modest development potential will retain and enhance the obvious sense of cohesion and place.

LDP Submission

- 2.20 The proposal to de-designate Derryboye as a small settlement would result in increased pressure for single dwellings in the open countryside. That outcome would be in conflict with the SPPS strategic objectives, would inevitably lead to loss of young people from the local community due to reduced housing availability and negatively impact on the sustainability and vibrancy of the rural community. In that context the proposal is unsound in respect of Consistency Test C3.

Coherence & Effectiveness Test CE1 – failure to set out a coherent strategy from which its policies and allocations logically flow

- 2.21 Our client supports the overall vision of the DPS and welcomes the social objectives to deliver the vision. In particular the overall social objective of: 'Accommodating People, Creating Quality Places and Improving Health and Wellbeing' and the specific objectives of:
- *To provide for vital and vibrant rural communities in our villages and small settlements which meet the daily needs of their rural hinterland whilst protecting the countryside by accommodating sustainable growth.*
 - *To recognise the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities.*
- 2.22 While the Spatial Growth Strategy and Settlement Hierarchy recognises the role of rural communities living in smaller settlements and the open countryside, allowing them to maximise their potential, the proposal to de-designate Derryboye from its status as a small settlement to open countryside directly conflicts with these objectives.
- 2.23 Under Strategic Designation SETT1 – Settlement Hierarchy, the DPS states that small settlements will allow for small scale development which is appropriate to the scale and capacity of the settlement while acting as a local focal point serving a small community. As set out above, Derryboye serves that role in its rural hinterland. The de-designation of the small settlement is at odds with the DPS objectives. In that context the DPS is not based on a coherent strategy and is unsound in respect of the Coherence & Effectiveness Test CE1.

Coherence & Effectiveness Test CE2 - failure to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

- 2.24 The DPS states that the proposal to declassify a number of small settlements, including Derryboye to open countryside is the outcome of 'a full review of existing settlements' and that 'as a result of changing circumstances in some rural areas, including the closure of local schools or businesses, some settlements which previously met the criteria for designation as small settlements can no longer justify this designation.'
- 2.25 On review of available/published evidence as set out in the various Technical Supplements (and supporting studies) there has been no such full review of the small settlement of Derryboye. Technical Supplement 7 Countryside Assessment states that a Strategic Settlement Appraisal is set out in Appendix 7B. That document provides details of the assessment of 49 small settlements. There is no assessment of Derryboye.
- 2.26 Had such an assessment been undertaken it would have found that, in line with the previous PAC direction on the common characteristics of a small settlement Derryboye:
- contains an appreciable number of buildings in close proximity to each other
 - displays an obvious sense of cohesion and place

LDP Submission

- offers a range of community facilities in the primary school, preschool nursery, a bespoke clothing design and manufacturing outlet and a nearby church.
- Offers the potential for modest small-scale infilling or rounding off of existing development that will enhance the physical cohesion of the settlement, enhance social cohesion and interaction and assist in maintaining the longer term sustainability of the primary school, pre-school nursery, church and other local community facilities in a manner that minimises risk of significant impact on the character and landscape quality of the surrounding rural area.

2.27 The SPPS (paragraph 5.5) states that:

- Engaging communities is an essential part of good spatial planning and for an effective and inclusive planning system overall.
- Furthermore, to fully appreciate and respect democratic accountability, it is necessary to understand the need for balanced decision-making in the public interest when preparing LDPs.
- Plans should be evidence-based and informed by meaningful participation with all relevant stakeholders. While LDPs present a clear sense of direction, they should also be adaptable to change.

2.28 Representations to this process from the local community (Appendix 2) stress the important role that Derryboye, as the small settlement, plays in the local community. The local community appreciates the importance of allowing sensitive and modest growth at this location to sustain a vibrant rural community with sustainable services including local community facilities.

2.29 The proposal to de-designate Derryboye is not based on a robust evidence base and in that context the proposal is unsound in respect of the Coherence & Effectiveness Test CE2.

LDP Submission

3.0 CONCLUSIONS

- 3.1 The Council, in its paper supporting the Preferred Options Paper (Population & Growth Settlement Hierarchy) committed to undertaking a full review of all of the 88 settlements along with a Countryside Assessment.
- 3.2 On review of available/published evidence as set out in the various Technical Supplements (and supporting studies) there has been no such full review of the small settlement of Derryboye. Technical Supplement, Appendix 7B - Strategic Settlement Appraisal provides details of the assessment of 49 small settlements. There is no assessment of Derryboye.
- 3.3 The proposal to de-designate Derryboye from a small settlement to open countryside is not based on robust evidence.
- 3.4 If such an assessment had been undertaken it would have discovered that the settlement of Derryboye supports existing community facilities in the primary school, pre-school nursery and local churches as well as a commercial clothing design and sales outlet.
- 3.5 There is a demonstrable interdependency between local schools, churches and their community. If pupil numbers fall the local primary school and nursery will be under threat of closure and those critical community connections will be lost. That outcome is at odds with the objectives of the RDS, SPPS and the DPS vision and strategic objectives. Retaining Derryboye as a small settlement can assist in reducing that risk.
- 3.6 We respectfully request that the Council re-consider this proposal, taking account of the concerns raised in this submission.
- 3.7 Our clients request that they are included in any inquiry process to discuss these matters further.

LDP Submission

APPENDIX 1: Letter of Objection from Chair of Board of Governors Derryboy PS

Proposed De-designation of Derryboye as a Settlement – Impact on Derryboy Primary School

To whom it may concern,

In my capacity as Chair of the Board of Governors of Derryboy Primary School I have concerns that this proposal would have a deeply damaging impact on Derryboy Primary School.

De designating Derryboye from a small settlement to open countryside would significantly restrict future residential development. This means fewer young families will be able to move into the area, which will likely result in a gradual decline in pupil numbers at Derryboy Primary School. This is a real concern in an already rural context, where small schools depend on stable catchment populations to survive. The community has fought for many years to keep the school sustainable. The opening of 'Little Acorns Cross-community pre school' is a part of this initiative. Retaining Derryboy as a small settlement with the opportunity for a modest number of additional houses is a lifeline that the school and the wider community needs. Without potential growth and with reduced opportunities for young families to move into the area there may be a decline in enrolment threatening the long term viability of the school.

Settlement status supports sustainable growth. Without it, Derryboye becomes less attractive to young families looking to settle in the countryside, who might otherwise have contributed to the long-term health and diversity of the school community.

As a Governor, I am deeply concerned that this policy decision would undermine the long-term future of Derryboy Primary School. The school has served the area faithfully for generations, adapting to the needs of a changing rural population. It is vital that planning policy supports—rather than restricts—our ability to sustain such an important local institution.

I strongly urge the Council to retain small settlement status for Derryboye in the Draft Plan Strategy and adopt a planning approach that supports rural schools, families, and community infrastructure

Yours faithfully,

A large black rectangular redaction box covering the signature area.



LDP Submission

APPENDIX 2: Letters of Objection from Local Residents



Objection to the Proposed De-Designation of Derryboyne small settlement.

Dear Local Development Plan Team,

I am writing as both a long-term resident of Derryboyne and as a landowner within the current settlement limits to formally object to the proposed de-designation of Derryboyne from a small settlement to open countryside in the proposed Draft Plan Strategy.

The de-designation of Derryboyne would have serious consequences for the future sustainability of our community and for residents like myself who have invested in the area. As a landowner within the current small settlement boundary, I am particularly concerned that de-designation would severely restrict future opportunities for appropriate and small-scale development. Ultimately this will prevent my family, and others in similar circumstances, from being able to build homes locally for future generations.

Removing Derryboyne's small settlement status would also undermine the wider community. Derryboyne's settlement designation helps sustain local identity, supports investment in infrastructure, and provides a framework for maintaining services. It is also crucial to ensure the long term sustainability of the local church and Derryboy Primary School. Without this recognition, Derryboyne risks decline with fewer opportunities for young families to remain here, reduced justification for infrastructure improvements, and an erosion of the community that has developed over generations.

I respectfully urge the Council to retain Derryboyne's settlement designation so that the community can remain viable, and residents and landowners alike can continue to contribute to its future growth in a sustainable and responsible manner.

Yours faithfully,

A black rectangular redaction box covering the signature area.

A small black rectangular redaction box covering the name area.



16 September 2025

To whom it may concern,

I wish to express my concern and objection to the proposed de-designation of Derryboye as a small settlement.

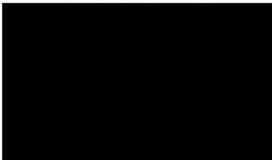
Over two decades ago, my family and I made the conscious decision to settle in Derryboye. We were drawn to its peaceful rural setting, sense of community, and the opportunity to raise our children in a safe and nurturing environment. That decision has shaped our lives in the most positive way. Our children grew up surrounded by nature and were supported by neighbours. Both of our children also attended Derryboy Primary school.

The designation of Derryboye as a small settlement has allowed potential for modest and appropriate development, helping families like mine to put down roots and contribute to the life of the community. It has also enabled younger generations to remain close to family, rather than being forced to move away due to lack of housing options.

Removing this designation would be a disservice to families like mine who have chosen to make Derryboye their home. It would restrict future modest growth, and risk turning it into a forgotten corner of the countryside. More importantly, it would send a message that communities like ours no longer matter.

I urge the Council to reconsider this proposal.

Yours faithfully,



Objection to the Proposed De designation of Derryboye as a Settlement

To whom it may concern,

As a representative of Raffrey Presbyterian Church, I wish to register my concern to the proposed de- designation of Derryboye as a small settlement in the Newry, Mourne and Down Draft Plan Strategy.

Raffrey Presbyterian Church is a rural church which plays a vital role in the spiritual, cultural, and social life of the area. It has served generations of local residents and continues to function as a centre for worship, community gatherings, charity fundraising events and outreach activities. Our continued viability depends significantly on having a local population base within accessible reach.

By maintaining the settlement limit at Derryboye and continuing to allow for potential modest growth, the Council can help ensure appropriate development can still occur. This means providing homes for young families and older residents who wish to remain near their roots and continue participating in Church life.

De designating Derryboye risks stifling new housing stock for young families by shifting development elsewhere. No sustainable growth of the population in the immediate area, ultimately will lead to decline in use of essential local facilities like Raffrey Church.

I urge the Council to reconsider this proposal and instead support a planning approach that protects Derryboye and ultimately our Church.

Thank you for your attention to this matter.

Yours faithfully,

A black rectangular box redacting the signature of the representative of Raffrey Presbyterian Church.A black rectangular box redacting the address of the representative of Raffrey Presbyterian Church.

To whom it may concern

Re: Proposed De-Designation of Derryboye as a Small Settlement

As a resident and business owner, I wish to express opposition to the proposed de-designation of Derryboye within the Draft Plan Strategy.

Derryboye has a rich rural character and a close-knit community. While modest in size, it plays a vital role in the local area, offering a peaceful and sustainable living environment for families, retirees, and individuals who value rural living whilst being part of a community. The current designation as a small settlement has allowed for appropriate and sensitive development that respects the character of the area while meeting local housing needs.

Removing this designation would severely limit future opportunities for growth and renewal. I believe it would reduce housing options for younger generations wishing to remain in the area and undermine the viability of local services such as Derryboy Primary School.

I urge the Council to reconsider this proposal and to recognise the importance of maintaining Derryboye as a small settlement. Doing so will help preserve our community for generations to come.

Thank you for considering my views.

Yours faithfully,

A large black rectangular redaction box covering the signature area of the letter.

Whom It May Concern,

I wish to formally object to the proposed de-designation of Derryboye as a settlement within the Draft Plan Strategy for Newry, Mourne and Down.

When I chose to move to Derryboye, I did so because I saw the potential for it to become an ideal family location — a place not only for myself, but also somewhere my children and, in time, my grandchildren could live and thrive. At that time, the area was largely made up of an elderly and declining population. In recent years, however, it has been transforming into a more sustainable and vibrant community, with new families settling and strengthening its social fabric. This positive change has been based on the expectation that Derryboye would continue to provide family accommodation into the future.

I am a resident of Derryboye and have built my own home here, investing considerable time, effort, and financial resources into establishing a permanent residence. I have also contributed to the community by providing an additional house, which has enabled a young family to settle here. This reflects the importance of maintaining opportunities for families to live in Derryboye.

I believe that the decision to de-designate the area as a settlement undermines both my personal investment and the broader recognition of Derryboye as a place where families can live, grow, and contribute to local life. Derryboye already accommodates permanent housing, including multi-generational residents and new arrivals alike. Removing its settlement status would make it significantly harder, if not impossible, for young families — especially those with roots in the area — to remain here.

Derryboye's current settlement status acknowledges that it is suitable for sustainable residential development. Since the last area plan, several new homes have been built, including my own, which demonstrates that the area is evolving and strengthening rather than declining. It is therefore unclear what has changed to justify removing its designation.

In my view, directing development to small settlements like Derryboye is far more sustainable than dispersing houses across the open countryside. If the settlement limit is removed, I believe it will inevitably result in more applications for scattered rural dwellings, which would erode the character of the countryside and be less sustainable in the long term.

For these reasons, I respectfully request that Derryboye retains its designation as a small settlement.

Yours faithfully,

A large black rectangular box redacting the signature of the sender.A black rectangular box redacting the address of the sender.