



# 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 | 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<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.

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](https://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☐ 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 Lands at Drakes Bridge Road Crossgar**



|                |   |
|----------------|---|
| Crossgar       | █ |
| LDP Reps       |   |
| Final          |   |
| September 2025 |   |



## LDP Submission

---

*This page is deliberately left blank*

## LDP Submission

---

### Contents

|     |  |   |
|-----|--|---|
| 1.0 | INTRODUCTION .....                                     | 1 |
| 2.0 | CROSSGAR IN THE SETTLEMENT HIERARCHY .....             | 2 |
|     | Strategic Designation SETT1 Settlement Hierarchy ..... | 2 |
| 3.0 | DPS HOUSING STRATEGY.....                              | 6 |
|     | Strategic Policy HS1 Housing Land Allocation.....      | 6 |
| 4.0 | CONCLUSIONS .....                                      | 9 |

### FIGURES/TABLES

|  |   |
|--|---|
| Figure 1: RDS Hierarchy of Settlements and Related Infrastructure Wheel.....     | 2 |
| Table 1: Settlement Hierarchy Local & Small Towns Infrastructure Parameters..... | 4 |

### APPENDICES

Appendix 1: Subject Lands

Appendix 2: Housing Market - Fitzpatrick Estate Agent Evidence

## 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 27<sup>th</sup> June 2025.
- 1.2 This representation relates to the growth strategy, the proposed settlement hierarchy, and the distribution of housing land within that hierarchy.
- 1.3 It relates to land that is not currently zoned under the Ards & Down Area Plan 2015 and responds to the relevant strategy and policy considerations set out in the DPS with particular regard to the 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.
- 1.5 For the reasons set out below, it our considered view that the DPS 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.

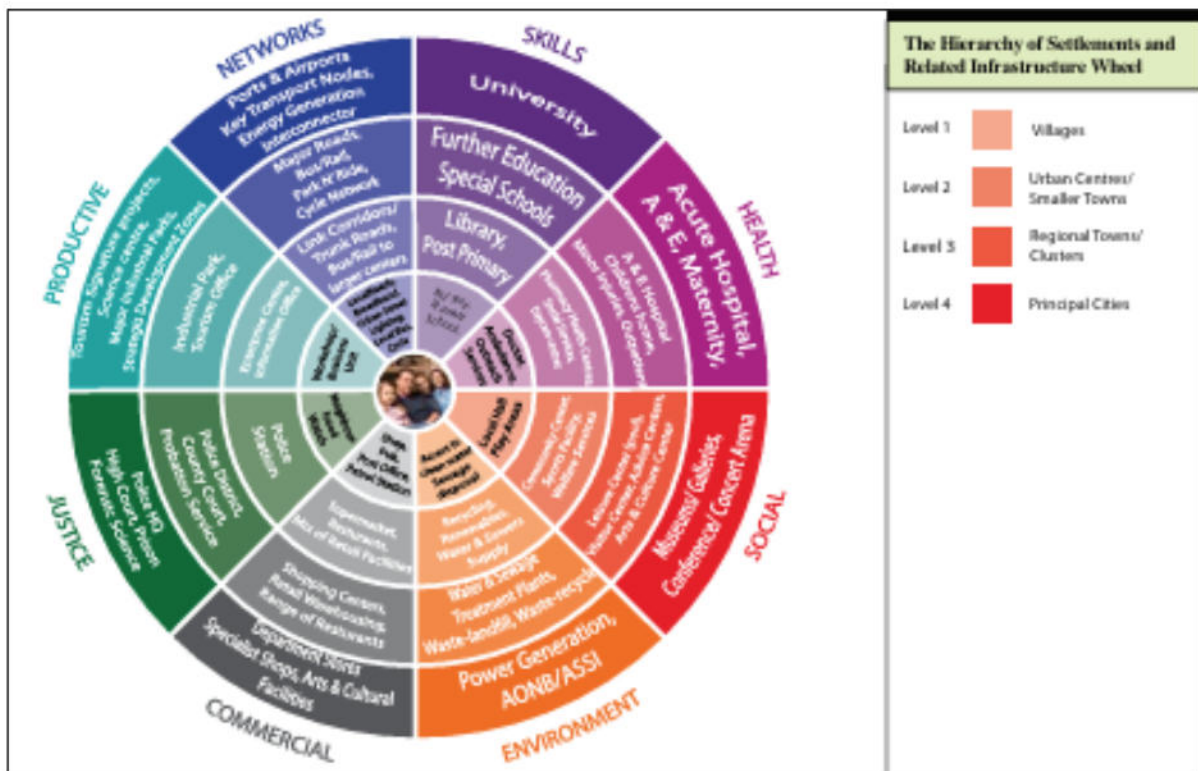


## LDP Submission

## 2.0 CROSSGAR IN THE SETTLEMENT HIERARCHY

### Strategic Designation SETT1 Settlement Hierarchy

- 2.1 The DPS proposes to designate Crossgar as a village under Strategic Designation SETT1 and states that the designation is based on a full evaluation of all settlements as set out in Technical Supplement 1 - Settlement Hierarchy and Strategic Settlement Evaluation, which takes into account the RDS Regional Spatial Framework, including the six tests of the Housing Evaluation Framework (Resources, Environmental Capacity, Transport, Economic Development, Urban/Rural Character, Community Services), the Hierarchy of Settlements and Related Infrastructure Wheel, census data, the existing development plans, together with the information detailed within the NISRA document 'Classification and Delineation of Settlements'.
- 2.2 It is our considered view, in line with a previous submission to the consultation on the Preferred Options Paper in August 2018, that the proposal is not consistent with the RDS Regional Spatial Framework, the Hierarchy of Settlements and Related Infrastructure Wheel, and the NISRA document 'Classification and Delineation of Settlements'.



**Figure 1: RDS Hierarchy of Settlements and Related Infrastructure Wheel**

- 2.3 We support the key aim of the LDP in seeking to define a spatial growth strategy that supports the development and regeneration of the area socially, economically and environmentally.
- 2.4 We welcome the recognition that the RDS provides a hierarchy of settlements and related infrastructure wheel (Figure 1), which outlines the patterns of service provision that are likely to be appropriate at different spatial levels including villages, smaller towns, regional towns and principal cities. The model recognises the strong relationship between settlement size and the level of service that can be supported, which is a key consideration in establishing a settlement hierarchy.



## LDP Submission

- 2.5 The RDS Hierarchy of Settlements and Related Infrastructure Wheel provides direction on the range of public and private services needed to ensure citizens have access to the necessary economic, social and cultural opportunities, as well as the infrastructure required by businesses to build a competitive dynamic and innovative economy. These services include transport and communication networks, education, health, social, environment, commercial and justice. The wheel outlines the patterns of service provision that are likely to be appropriate at different spatial levels in the settlement hierarchy. The model recognises the strong relationship between settlement size and the levels of service that can be supported. The wheel provides a forward perspective, providing some understanding of the level of facilities and services anticipated at different spatial levels rather than necessarily reflecting the stock of services that are currently available in villages, towns, cities or regionally (emphasis added).
- 2.6 The Council detailed analysis of each settlement and its position in the settlement hierarchy is set out in Appendix 7B Strategic Settlement Appraisals. The assessment of Crossgar confirms that: *“Within the RDS Infrastructure wheel Crossgar meets all of the criteria within tier 1 and most criteria in tier 2 including a doctors’ surgery, pharmacy, and health services, post primary school, community centre, sports pavilion, supermarket, post office, restaurants, cafes, and bus /road links to larger centres. The police station has now closed and there is no public library. Crossgar demonstrates significant tier 1 (village) and tier 2 (small town) criteria in the RDS.”*

| Infrastructure Group | Tier 2 – Local & Small Towns                              | Commentary   |
|----------------------|---|--|
| <b>Skills</b>        | Library, Post Primary                                     | St Colmcille’s High School, Killyleagh Road  |
| <b>Health</b>        | Pharmacy, Health Centre, Social Services, Day Care Centre | 2 no. dental practices, GP practice on James Street, pharmacy on Killyleagh Street   |
| <b>Social</b>        | Community Centre, Sport Facilities, Welfare Services      | 4 Churches, Tobar Mhuire Retreat & Conference Centre, Crossgar Community Centre on Downpatrick Street, Crossgar War Memorial community hall on John Street; Crossgar Golf Club on Derryboy Road, sports pavilion, Kilmore FC |
| <b>Environment</b>   | Recycling, Renewables, Water & Sewer Supply               | Recycling centre & bins Kilmore Road. Sewage and waste water is pumped from Crossgar to Killyleagh WWTW which has growth capacity.   |
| <b>Commercial</b>    | Supermarkets, Restaurants, Mix of Retail Facilities       | 3 no. petrol filling stations, two of which are located on Downpatrick Road and one located at Killyleagh Street; several car showrooms, strong mix of retailing, including  |

## LDP Submission

|                   |   |   |
|-------------------|---|---|
|                   |   | international wine suppliers, strong range of restaurants, cafes & bistros; independent retail outlets, furniture shops, public houses, estate agents, post office & other service sector providers; employment uses. |
| <b>Justice</b>    | Police  | PSNI station closed – in line with practice in many local towns across the region.  |
| <b>Productive</b> | Enterprise Centre, Information Office                   | Zoning of IPA 1 for Light Industrial Use; strong history of industrial activity in Crossgar – Crossgar Poultry, GB Poultry, Sauce Works as well as vehicle servicing and repairs                                      |
| <b>Networks</b>   | Link Corridors, Trunk Roads, Bus/Rail to Larger Centres | Strategic location on Link Corridor in RDS - A7 providing connections to Downpatrick, Saintfield and Belfast. Main bus route to/from Belfast, as well as connection to bus station in Ballynahinch                    |

**Table 1: Settlement Hierarchy Local & Small Towns Infrastructure Parameters**

- 2.7 Figure 1 above is adapted from the DPS Table 4 which sets out the Settlement Hierarchy Tiers and the relevant infrastructure provision associated with each level. It is clear that Crossgar does demonstrate significant compliance with the tier 2 (small town) criteria as set out in the RDS.
- 2.8 The RDS Spatial Framework sets the context for determining future development priorities. The role of settlements located on key transport corridors and link corridors is a significant consideration in assessing the growth potential of a settlement as enhanced accessibility between the critical mass together with the settlement own services/employment/residential offer reduces the need to travel, encourages sustainable movement choices, makes efficient use of infrastructure and resources, as well as successfully and sustainably integrating new employment and residential development uses, all of which are aspirations within the RDS. The location of a settlement along a link corridor provides it with an advantage in terms of its role and its growth potential, which embodies the '*forward perspective*' envisaged by the RDS.
- 2.9 Further, Crossgar is well-positioned geographically between Saintfield (c.5.5miles north), Ballynahinch (c 6.0 miles west) and Downpatrick (c. 5.3 miles south) to 'cluster', given its current role as a local service centre serving the smaller settlements and wider catchment that surrounds it. The RDS notes that there is no reason why towns, other than those identified in the Spatial Framework, cannot cluster and work together in this manner to strengthen the overall quality and extent of services, facilities and opportunities for the critical mass.



## LDP Submission

---

- 2.10 In addition, the NISRA document entitled 'Review of the Statistical Classification and Delineation of settlements' notes specifically that *"When all types of establishment were considered, Crossgar and Saintfield consistently had a relatively low level of population per establishment, suggesting that they supply services to an outside population as well to their own."* It also stated that: *"Saintfield, Crossgar and Ballynahinch support a wider range of services than might be expected from their resident population, by serving a more extensive catchment area - a classic urban function."*
- 2.11 In comparing Crossgar to a number of similar sized villages, the function and role of Crossgar differs due to its more varied offer of services within a rural locality establishing it as a higher tier settlement serving a greater purpose. Although its resident population is currently 2010 with 822 households (2021 Census), the NISRA report identified it as serving a wider catchment of smaller settlements (including Kilmore, Annacloy and Derryboye) which affirms its urban functionality and, practical, everyday place in the local settlement hierarchy, establishing its position as a small town and local service centre rather than a village.
- 2.12 The DPS proposes that three of the small towns should be uplifted from villages, Saintfield, Castlewellan and Killyleagh. A review of the Strategic Settlement Appraisals confirms that Crossgar compares very favourably with all three settlements in respect of the infrastructure groups assessed. Indeed Crossgar due to its location on a RDS 'linked corridor' means that it should score more highly than the other three settlements in terms of the compliance with RDS objectives.
- 2.13 The proposal to designate Crossgar as a village rather than a small town is contrary to the RDS provisions and it is therefore unsound in the following respects:
- Procedural Test P2 – it fails to take proper account of representations made to the Preferred Options Paper
  - Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
  - 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 its own evidence base.



## LDP Submission

### 3.0 DPS HOUSING STRATEGY

#### Strategic Policy HS1 Housing Land Allocation

- 3.1 The LDP has a key role to play in promoting and facilitating sustainable housing through the zoning of land and the provision of planning policy to support the provision of quality living environments and affordable housing.
- 3.2 The RDS provides guidance for achieving sustainable patterns of residential development, to meet the needs of the whole community, and highlights the importance of housing as a key driver of physical economic and social change in urban and rural areas. It promotes more sustainable housing development within existing areas and seeks to ensure an adequate and available supply of quality housing to meet the needs of everyone.
- 3.3 The DPS follows the process set out in the SPPS for allocating housing land, taking account of the following:
  - RDS Housing Growth Indicators (HGLs)
  - RDS Housing Evaluation Framework
  - Allowance for existing housing commitments
  - Urban Capacity Studies
  - Allowance for windfall housing
  - Sequential Approach & identification of suitable sites for settlements > 5000 population
  - Transport Assessments
- 3.4 The SPPS regional strategic objectives for housing in settlements are to:
  - Manage housing growth to achieve sustainable patterns of residential development
  - Support urban and rural renaissance
  - Strengthen community cohesion.
- 3.5 The DPS raises the current issues around Wastewater Treatment Works (WWTW) capacity and the capacity of network feeding into the WWTW which have been flagged by NI water for a range of settlements across the district. It is recognised that this is ongoing issue with NI Water continuing to review their network capacity and roll out upgrading works to address work programme priorities. However, the DPS states that: *'At this stage it was considered premature to rule out sites due to capacity issues, consultation will be undertaken with NI Water at the Local Policies Plan, and this will further inform whether the development of certain sites should be ruled out.'* This is not a sustainable approach as the difficulties are very real and very present. NI Water recently announced that they are 'mothballing' its flagship Living With Water Programme and confirmed that there is currently insufficient funding available to deliver any of the Major Projects included within the Living With Water Plan for Belfast, including Belfast WwTW Phase 1, Sydenham WwPS, Kinnegar WwTW, Whitehouse WwTW and Extension of the Belfast Storm Water Tunnel. This reflects a funding crisis in NI Water's capacity to deliver upgrades to their critical infrastructure. It is a situation that cannot be ignored and should be taken into account now in the allocations to settlements. Crossgar is a settlement that still has growth potential in that regard.
- 3.6 The DPS proposed management of housing supply treats lands associated with major roads proposals in the shape of the Ballynahinch bypass and the Downpatrick distributor road. It is predicted that these lands could deliver 833 units as zoned Phase 2 sites. The intention is that



## LDP Submission

these sites be released within the Plan period where it is evident that through monitoring or re-appraisal of future housing need that these housing sites will be required. Given the long history of these proposed major infrastructure projects and numerous false dawns in respect of their delivery in the past, together with the local funding crises in health, infrastructure and education, it is far from certain that these lands will deliver any housing within the projected Plan period.

- 3.7 The settlement strategy proposes that three of the small towns should be uplifted from villages and the intention is to support the growth of these new towns in accordance with their uplifted designation. As set out in section 2 of this submission, it is our strongly held view that Crossgar should also be uplifted in status to a small town and the housing allocation should be increased from the currently proposed figure of 123, to reflect that position. The subject lands under the ownership and control of our clients (see Appendix 1) would be an appropriate location for further growth of Crossgar at a scale and character appropriate to its size and location.
- 3.8 Without prejudice to that position, Crossgar as a settlement is, in any event, well placed to deliver an increased allocation of housing to meet the RDS and LDP objectives. Under the consideration of 'Transport Assessment' the DPS confirms that the aim is to focus new development where it is most accessible, directed through the provisions within the strategic policy on Sustainability and Climate Change and a range of operational policies.
- 3.9 The NIHE Strategic Housing Market Analysis (SHMA) summary report, published in June 2022, sets out new dwelling requirements in a medium growth requirement for the district (10,630) alongside a high growth requirement (11,420). Unlike the HGIs, the new dwelling requirement set out in the SHMAs includes a backlog component which is the level of existing unmet need and is the shortfall between current provision and the accommodation needs of existing households or families not yet formed as separate households. The DPS adopts a position that the application of the 10% flexibility allowance would *'contribute to meeting the NIHE overall medium growth requirement.'* The DPS concedes that deliverability of affordable housing will depend to a large degree on zoned sites still to be developed, alongside windfall sites outside of these zonings and the extent to which these come forward over the Plan period. Further to that, the NIHE Housing Investment Plan (HIP) as updated in 2024 confirms a social housing need for 2,234 units in the district. There is a high need identified for Crossgar with 61 units required for the period 2023-2028. This higher, pressing need should be factored into the housing allocation for the settlement.
- 3.10 For the reasons outlined above, a targeted approach is necessary to ensure the allocation of housing over the next 15 years reflects the strengths of individual settlements, and their capacity to deliver a flexible response to meeting the identified housing need. Analysis by a local estate agent with expert knowledge of the housing market (Appendix 2) confirms that there is a shortage of housing supply in this area, particularly for affordable housing.
- 3.11 While the subject lands currently lie out-with but adjacent to Crossgar Settlement Limit along its most southerly boundary, as identified in the Ards and Down Area Plan 2015, they lie adjacent to a well-established residential area. Access can be readily provided from the ongoing existing housing area (zoning ref: HPA 2) and the subject lands represent a natural rounding off of the development limit, with Drakes Bridge Road acting as the definitive settlement limit boundary, as recognised by the PACNI Report into the Ards & Down Area Plan 2015. The proposed lands differ from existing zoned and undeveloped lands (zoning HPA3 in Ards & Down Area Plan 2015) in that they consolidate the residential quarter between Drakes Bridge Road and the A7 and benefit from close vehicular and pedestrian connection to the



## LDP Submission

---

main road and public transport availability. The lands are also available for development when the need arises.

3.10 In that context increased provision at Crossgar on the subject lands would assist in meeting the LDP objectives in that:

- It would open up capacity to provide for a proportionate mix of housing type, size and tenure in an accessible location with good transport links to other key towns in the district as well as having strong public transport connections with those towns and the city of Belfast.
- An appropriate allocation close to existing residential areas within the settlement and close to the A7 would provide for the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities and maintain their existing connections, while still enabling relatively independent living.
- It would promote integration between transportation and new development to reduce the need to travel and reduce dependency upon travel by car.
- It would provide opportunities for sustainable travel including walking, cycling and public transport and reduce the need to travel by private car.

3.11 The approach to the proposed allocation, while in broad terms following the approach of the RDS and SPPS, does not take appropriate account of the situation at each settlement with regard to their scale, location in respect of other settlements and main transport corridors, current and future role, both individually and as part of potential clusters, and environmental considerations. The allocation for Crossgar is inadequate and doesn't reflect the role that the settlement can play in delivering on the RDS and LDP objectives due to its particular location and relationship with the wider district and beyond. In that context the proposal is unsound in the following respects:

- Procedural Test P2 – it fails to take proper account of representations made to the Preferred Options Paper
- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
- 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.

## LDP Submission

---

### 4.0 CONCLUSIONS

- 4.1 The proposal to retain Crossgar as a village rather than a small town is unsound as this settlement compares favourably in respect of service provision and capacity for growth to the three settlements proposed for uplift. Crossgar should be re-designated as a small town and granted an uplift in housing allocation to reflect that position.
- 4.2 It is important that additional homes are provided in settlements that are well connected to the strategic network, while at the same time providing opportunities for local working and education.
- 4.3 There is an opportunity to rationalise the proposed housing lands at Crossgar to round off the settlement with housing that responds to identified local need and integrates well with the existing settlement pattern. Our clients' lands provide the opportunity to do that.
- 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 matter 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







## APPENDIX 2: HOUSING MARKET



Mr Seamus Fay  
Fay Planning Consultancy

Email: [seamus@fayplanningconsultancy.com](mailto:seamus@fayplanningconsultancy.com)

16<sup>th</sup> September 2025

**Re: Housing Market Commentary in Support of Lands South of Graysfield and Rocksfield, Crossgar**

Dear Seamus,

As a Chartered Surveyor and estate agent active in the Crossgar area, I wish to provide commentary on the local housing market to support the proposed zoning of lands south of Graysfield and Rocksfield for residential development.

Over the past decade, very limited housing has been delivered in Crossgar, despite strong and growing demand. My firm's sales evidence shows that whenever a property becomes available, it generates an exceptionally high level of enquiries and viewings, far in excess of the Northern Ireland regional average.

This demand pressure has translated directly into house price growth in Crossgar that exceeds the regional average, underlining both the shortage of supply and the market's willingness to absorb new stock.

The consequence is a particular strain on the affordable housing sector. Local buyers — especially first-time purchasers and young families — are finding it increasingly difficult to access the housing market in Crossgar due to rising prices and the absence of new development. There is therefore a pressing need for affordable housing provision in this settlement.

The subject lands represent an opportunity to respond to this need:

- They adjoin the completed developments at Graysfield and Rocksfield (HPA 2).
- Road hammer-heads and services are already in place, enabling swift connection and immediate progression of development.



- The landowner is fully committed to making the lands available and moving forward with a planning application should zoning be confirmed.

It is also relevant that lands currently zoned as HPA 3 remain undeveloped. This does not reflect a lack of demand, but rather unrealistic vendor value expectations, which have effectively sterilised the site. By contrast, the subject lands are deliverable, available, and viable.

In conclusion, there is a clear and pressing market demand for housing in Crossgar, (see attached article from Down Recorder, 10<sup>th</sup> September 25) with prices rising above the regional average and affordability pressures intensifying. The subject lands represent a logical, serviceable, and immediately deliverable solution, and I strongly support their consideration for zoning within the adopted plan.

Yours faithfully,







# Down Recorder

Wednesday, 10th September, 2025

£1.70

## ACUTE NEED FOR HOMIES

### 1,965 now on waiting list for social housing

BY DAVID TELFORD

THE scale of the district's social housing crisis has been laid bare this week.

New figures published by the Housing Executive confirm there are currently 1,965 people on the waiting list for public sector housing across the district, with demand continuing to outstrip supply.

The strategic housing authority has revealed that 1,555 of those on the waiting list are classed in the urgent need category – which is 79% of the overall total.

Across the entire Newry, Mourne and Down area, almost 4,000 people are on the social housing waiting list, with 3,242 in the urgent need category.

Locally social housing need hotspots include Downpatrick, Newcastle, Castlewells and Ballynahinch, with the numbers on the waiting list in the Killyleagh, Crossgar and Ardglass areas edging towards 100.

But there was some positive news on the homelessness front, with the latest figures presented to Newry, Mourne and Down Council revealing that the number decreased last year to 1,057, with those accepted as so-called full duty applicants decreasing to 877.

Politicians are concerned at the scale of the huge number of people seeking social housing but are aware of increasing pressure on housing

■ Continued on P2



**REVVING UP:** Eight year-old James Caldwell from Crossgar on one of the motorbikes on display in the village on Sunday for the annual Brian Steenson Group fundraiser. More photos on Page 18 Photo: Suzanne Reid



**Sharvin calls it quits in politics**  
SEE PAGE 4



**RGU power into SFC next round**  
SEE PAGE 57



## WE'RE HIRING



**APPLY NOW**  
@finnebroguejobs  
jobs@finnebrogue.com  
finnebrogue.com





**INCIDENT:** The suitcase which sparked last weekend's security alert in Downpatrick

BY DAVID TELFORD

BOMB disposal experts were called to examine a suitcase found abandoned close to the Royal Mail sorting office in Downpatrick on Saturday morning.

The case was spotted by staff arriving for work around 7am at the Ballydugan Road industrial estate when the alarm was raised.

Staff who were in the building were advised to remain there while others reporting for work were not allowed to enter the sorting office before police set up a security cordon and evacuated the premises around 8.45am.

All postal deliveries in Downpatrick and the surrounding area were cancelled while adjoining businesses were not allowed to open until the area was declared safe.

A number of homes in the Cathedral View area which backs onto the industrial estate were also evacuated.

Police say they received a report of a suspicious object located at the industrial estate with officers attending the scene along with ammunition technical officers.

They say the suit case was later declared a hoax and removed for further forensic examinations, with residents who had been evacuated allowed to return to their homes.

Sieve Croob councillor, Alan Lewis, said while he suit case at the centre of the security alert was declared a hoax "answers are needed".

# Bomb disposal experts inspect ditched suitcase



**ALERT:** The entrance to the Ballydugan Road industrial estate was sealed off during last Saturday's incident - Photo: Gareth Carville

Commending the swift and professional response from police and army technical experts, Cllr Lewis said their work ensured the immediate threat was managed quickly and residents were kept safe.

"While I am relieved that the incident has been dealt with, serious questions remain," he said.

"We need answers as to what exactly this was; why the Royal Mail offices were targeted and whether there is any wider pattern emerging?"

"Even though this incident has been

declared a hoax, the fact that such a critical service was chosen as the focus of disruption is both troubling and unacceptable."

Cllr Lewis said Saturday morning should have been a time of routine and calm for residents and workers in the area, but instead they faced uncertainty, disruption and confusion.

He continued: "The community deserves reassurance and the business community in Downpatrick needs support."

"Incidents of this nature and asso-

ciated disruption is deeply unhelpful, selfish and designed to manufacture fear, with people telling me they chose to stay away from Downpatrick last Saturday which is not what shops need."

Cllr Lewis said those responsible for the security alert need to be caught.

He added: "What was their reasoning for leaving this object? Hoax or not, their actions were irresponsible and caused much disruption where it isn't needed or wanted."

Police have confirmed that enquiries into Saturday morning's incident are

continuing and they have appealed to anyone who can assist them to come forward.

Anyone who believes they can help is asked to get in touch using the non-emergency 101 number quoting reference number 271 of 6/9/25.

A report can also be submitted online using the non-emergency reporting form via <http://www.psnl.police.uk/makeareport/> while information can be provided anonymously using the confidential Crimestoppers number 0800 555 111.

## 1,965 now on waiting list for social homes

■ Continued from P1

officials to meet need. Housing Executive officials are determined to do what they can and admit the challenges they face are "substantial and deep rooted".

The organisation's chief executive, Grainia Long, said there was a widening gap between new housing supply and demand which is illustrated by a growing waiting list for housing and more households requiring temporary accommodation.

She was joined by a number of senior officials during a meeting with local councillors to outline the organisation's housing investment plan.

Ms Long said the organisation's budget allocation means it is far from delivering the required targets to meet housing need.

The housing chief said the pressure on future capital spending continues in the current financial year and it will be another year where "the number of new social homes being built, falls short of what is required".

The Housing Executive says its five-year housing assessment for the district

until 2029 shows a need for 2,189 new homes with projected housing need in Newry, Newcastle, Downpatrick and Warrenpoint.

Downpatrick's projected housing need is 256 homes, with 286 in Newcastle and 115 in Ballynahinch and 120 in Castletown, with 67 in Crossgar and almost 50 in Killyleagh.

Drilling down into the latest social housing waiting list figures reveals that in Downpatrick, 512 people are on the social housing waiting list, with 433 in the urgent need category, with 488 people seeking public sector homes in the Newcastle area — 87% of applicants are in urgent need.

Just over 190 people are on the waiting list for social homes in the Ballynahinch area with 155 in the urgent need bracket, while in the Castletown area, 174 people are on the waiting list. The number in the urgent need category is 141.

Almost 90 people are on the waiting list in Killyleagh, with 66 in urgent need, with the figures for Crossgar, which includes Annacloy, 86 and 76 respectively.

In Ardglass, 79 are seeking social housing in the village, with 59 classed in the

urgent need category.

In Saintfield, 68 people are seeking public sector housing with 59 in urgent need, while 37 people are on the waiting list for a home in Killough, with 29 in urgent need.

The waiting list figures for the Dundrum, Seaford and Clough area are 66 and 49 respectively, while in Strangford and Kilcree, the respective figures are 32 and 27.

Twenty six people are seeking social housing in Drumaness, with 18 in the urgent need category.

Elsewhere, six people are on the waiting list in Annsborough, all of whom are in the urgent need category, with 11 seeking public sector housing in Ballykinler and Tyrella, with just over 50% in urgent need.

Six people are seeking social housing accommodation in Shrigley, with two thirds in urgent need, while 11 are on the waiting list in Kileco with eight in urgent need.

Four are on the waiting list in the Kilmore, Loughinisland and Annadorn area with one on the list for Burrenbridge and Spa.

## Downpatrick man accused of murder appears in court

A DOWNPATRICK man accused of murder and attempted murder has appeared via video-link at the local magistrates court.

Hugh Malone (30), of no fixed address, appeared last Thursday from Maghaberry Prison, where he is on remand.

He is accused of murdering Stephen Brannigan (36), who was found dead in Marian Park on August 10.

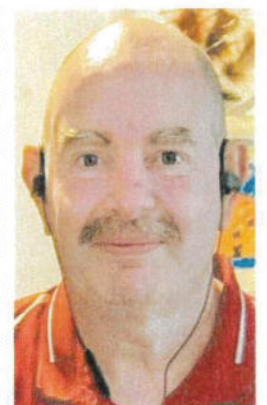
Malone is further accused of trying to kill Downpatrick parish priest Canon John Murray on the same date.

Canon Murray, who was attacked in the sacristy before mass, remains in hospital.

Wearing a grey sweatshirt and light trousers, he spoke only once in answer to a question while his case was reviewed.

A prosecution lawyer said the date for the full prosecution file is set for September 24 and made an application to adjourn the case to October 2.

Defence barrister Sean Doherty said he had no objection and District Judge Amanda Brady agreed to the application.



**MURDERED:** Mr Stephen Brannigan