



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			

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	Mr		
First Name	Thomas	Last Name	McCann
Address	119 Rathfriland Road		
Town	Newry	Postcode	BT34 1PH

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)

SETT2 & Strategic Policy HS1

(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 to rear of Granite Crescent
Sheeptown**



Sheeptown
LDP Reps
Final
September 2025



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LDP Submission

Contents

1.0 INTRODUCTION	1
2.0 SETTLEMENT LIMIT SHEEPTOWN.....	2
Strategic Designation SETT2 Settlement Development Limits.....	2
3.0 CONCLUSIONS	8

TABLES

Table 1: Planning Applications 2014-2022.....	5
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FIGURES

Figure 1: Extract from Development Pressure Mapping	3
Figure 2: Planning Applications within 2kms of Sheeptown.....	4
Figure 3: Flood Maps Sheeptown.....	7

APPENDICES

Appendix 1: Subject Lands	
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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.
- 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 Banbridge Newry & Mourne Area Plan 2015 (*'BNAMAP 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.

2.0 SETTLEMENT LIMIT SHEEPTOWN

Strategic Designation SETT2 Settlement Development Limits

- 2.1 The DPS confirms that small settlements act as a focal point for the rural community and take the form of a rural cluster or crossroads development where consolidation of the built form can provide opportunity for individual dwellings and/ or small groups of houses and small rural businesses.
- 2.2 The Settlement Appraisal carried out in respect of the LDP preparation confirms that Sheeptown consists of two nodes. It confirms that the northern node would qualify as a small settlement in its own right as it contains a significant number of dwellings and a range of businesses and commercial facilities. The southern node does not contain a significant number of dwellings, but contains a school, nursery, and church which serve a wider rural community.
- 2.3 The northern node of the settlement is located along the A25 approximately 5kms northeast of Newry. While the character of the settlement is generally rural in nature, being surrounded by open countryside, it plays host to a range of commercial outlets and services including a local shop, public house, deli, food takeaway, car detailing services, car maintenance & repairs, a beauty salon, a monumental mason and a hauliers yard.
- 2.4 The assessment recognises that there may be opportunities for rounding off, while confirming that the Rathfriland Road to the west of the northern node represents a suitable boundary for the settlement and any expansion would risk adding to existing ribbon along Rathfriland Road, Glenvale Road, and Sheeptown Road.
- 2.5 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.'*
- 2.6 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."*
- 2.7 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 must recognise these differences and 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

LDP Submission

accessibility to services. Sheeptown already provides a high level of services to its population and the surrounding rural hinterland.

- 2.8 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. The aim of the SPPS (paragraph 6.65) with regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities consistent with the RDS.

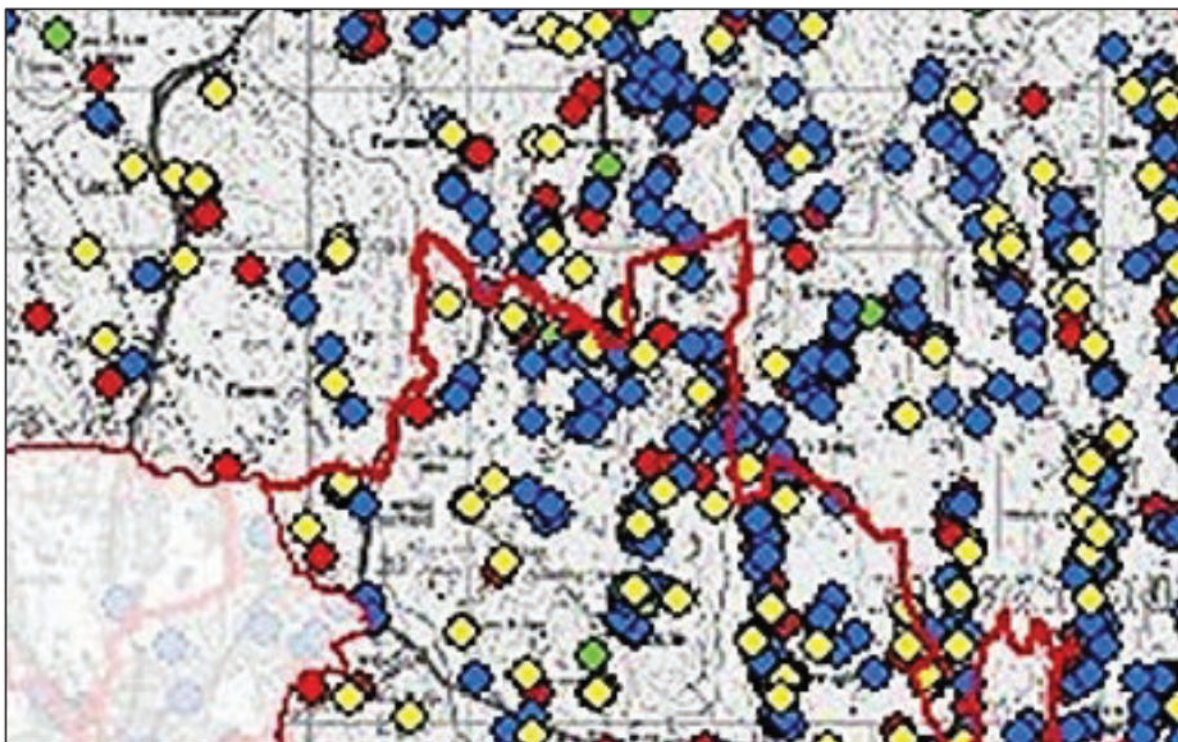


Figure 1: Extract from Development Pressure Mapping (Paper 13- Figure 7).

- 2.10 The Council has undertaken a Rural Development Pressure Analysis as part of the evidence gathering for this LDP. The mapping of development pressure as characterised by planning applications over a period of 2014-2023 is set out in Paper 13 – Countryside Development Pressure Analysis. The extract from Figure 7 of that document confirms a high level of pressure in the Crotlieve DEA generally and in the area around Sheeptown in particular (see Figure 1).
- 2.11 Our analysis of development pressure in the area surrounding Sheeptown confirms that there is high pressure for development, primarily residential within 2kms of the settlement of Sheeptown.

LDP Submission

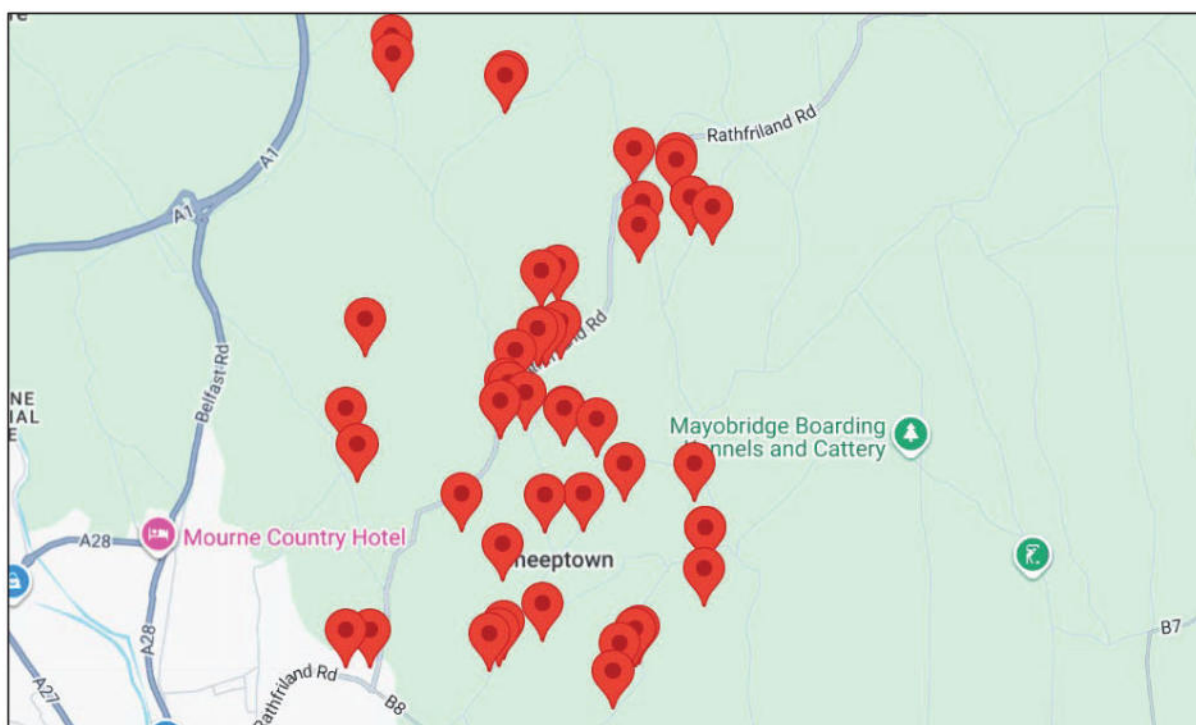


Figure 2: Planning Applications within 2kms of Sheeptown

Ref No	Proposal	Decision	Date
<u>P/2015/0217/F</u>	Retention of building to be used as domestic store/garage with alterations to same	Withdrawal	01-Oct-2015
<u>P/2015/0101/F</u>	Retention of enclosed self storage units within existing shed footprint	Approval	11-Dec-2015
<u>P/2015/0091/RM</u>	Dwelling on a farm.	Approval	02-Oct-2015
<u>P/2015/0087/F</u>	New replacement dwelling with detached garage	Approval	18-Jan-2016
<u>P/2015/0041/F</u>	Mechanical extraction & blasting of rock with 2No. crushers 5No. screeners 1No. conveyor together with the erection of a machinery storage shed	Approval	06-Apr-2018
<u>P/2014/1066/F</u>	Change of house type from that previously approved under ref P/2010/0866/F	Approval	03-Jun-2016
<u>P/2014/1047/F</u>	Proposed erection of a wind turbine with a 40m hub height and a 54m rotor diameter with max output not exceeding 250kw	Refusal	04-Sep-2019
<u>P/2014/0656/F</u>	Erection of replacement dwelling	Approval	05-Feb-2015
<u>P/2014/0586/RM</u>	Erection of new dwelling with domestic garage	Approval	22-Sep-2014
<u>P/2014/0332/F</u>	Replacement Dwelling	Approval	16-Jan-2015

LDP Submission

<u>P/2014/0196/F</u>	Erection of dwelling and garage (variation of condition number 3 provision of sight splays) approved under planning reference P/2010/0501/F	Approval	24-Feb-2015
<u>P/2014/0054/O</u>	Erection of 2 No. Dwellings	Refusal	20-Oct-2015
<u>LA07/2022/1603/RM</u>	New Dwelling and Garage	Pending..	
<u>LA07/2022/1470/F</u>	Proposed extension and alteration to dwelling including extension to domestic curtilage and revised access arrangements retention of curtilage and retention of domestic store and pigeon lofts	Pending..	
<u>LA07/2022/1235/O</u>	Erection of dwelling and detached garage	Pending..	
<u>LA07/2022/1210/O</u>	Site for dwelling and garage (renewal)	Approval	28-Oct-2022
<u>LA07/2022/1171/O</u>	Site for replacement dwelling and detached garage	Pending..	
<u>LA07/2022/0843/F</u>	Retention of farm dwelling (retrospective) with new build garage	Pending..	
<u>LA07/2022/0745/O</u>	Proposed erection of an outline off-site replacement dwelling house with detached domestic garage associated landscaping and ancillary site works	Pending..	
<u>LA07/2022/0669/F</u>	Proposed replacement dwelling and associated site works	Pending..	
<u>LA07/2022/0624/F</u>	Retention of dwelling and garage as constructed and retention of timber log cabin/store	Approval	04-Oct-2022
<u>LA07/2022/0485/F</u>	Proposed replacement dwelling domestic garage and granny flat	Pending..	
<u>LA07/2022/0132/F</u>	Proposed extensions to side front and rear of dwelling with associated site works and retention of increased associated curtilage	Approval	14-Apr-2022
<u>LA07/2022/0035/RM</u>	Proposed replacement dwelling and garage and associated site works	Pending..	
<u>LA07/2021/2150/F</u>	Demolition of existing garage and proposed new domestic store & home gym	Approval	08-Apr-2022
<u>LA07/2021/2048/F</u>	Proposed new detached swimming pool structure together with shower changing room toilet sauna and plant room.	Approval	18-Mar-2022
<u>LA07/2021/2047/F</u>	Proposed erection of farm dwelling and garage with associated amenity space and vehicular parking.	Pending..	
<u>LA07/2021/1828/F</u>	Proposed dwelling	Approval	09-Mar-2022
<u>LA07/2021/1771/F</u>	Proposed erection of new dwelling & garage	Approval	22-Jun-2022
<u>LA07/2021/1692/F</u>	Replacement dwelling and garage	Approval	21-Jan-2022

LDP Submission

<u>LA07/2021/1539/O</u>	Proposed replacement dwelling	Approval	06-Apr-2022
<u>LA07/2021/1358/F</u>	Retention of the conversion of an agricultural building to a dwelling and improvements to an existing access to serve the subject dwelling	Approval	26-May-2022
<u>LA07/2021/1124/F</u>	Proposed erection of farm dwelling and garage with associated amenity space and vehicular parking.	Pending..	
<u>LA07/2021/0755/O</u>	Site for dwelling with garage (gap site).	Approval	31-Mar-2022
<u>LA07/2021/0499/F</u>	Proposed 2no ball walls and play area	Approval	24-Jun-2021
<u>LA07/2021/0352/F</u>	Proposed replacement dwelling	Approval	10-Jun-2021

Table 1: Planning Applications 2014-2022

2.12 The SPPS regional strategic objectives for development in the countryside 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.

2.13 In that context the SPPS directs that, in preparing LDPs councils are bring forward a strategy for sustainable development in the countryside, together with appropriate policies and proposals that must reflect the aims, objectives and policy approach of the SPPS, tailored to the specific circumstances of the plan area. The policy approach must be to cluster, consolidate, and group new development with existing established buildings, and promote the re-use of previously used buildings. This sustainable approach facilitates essential new development, which can benefit from the utilisation of existing services such as access and drainage, whilst simultaneously mitigating the potential adverse impacts upon rural amenity and scenic landscapes arising from the cumulative effect of one-off, sporadic development upon rural amenity and landscape character.

2.14 The DPS Countryside Strategy reflects those strategic objectives and largely mirrors the SPPS strategic policy in respect of development in the countryside. However, the DPS strategy needs ensure it is aligned with the wider settlement strategy as directed by SFG13 of the RDS in seeking to sustain rural communities living in smaller settlements and the countryside.

2.15 That objective and strategic alignment can be achieved by making provision for more housing in the smaller settlements, particularly in settlements such as Sheeptown where there are well developed commercial and social services to meet the needs of the rural population.

2.16 While there is some land remaining within the settlement limit as defined in the Banbridge Newry & Mourne Area Plan 2015, lands on the south side of Glenvale Road are affected by flooding and therefore lands available for development are reduced. (see Figure 3)

LDP Submission

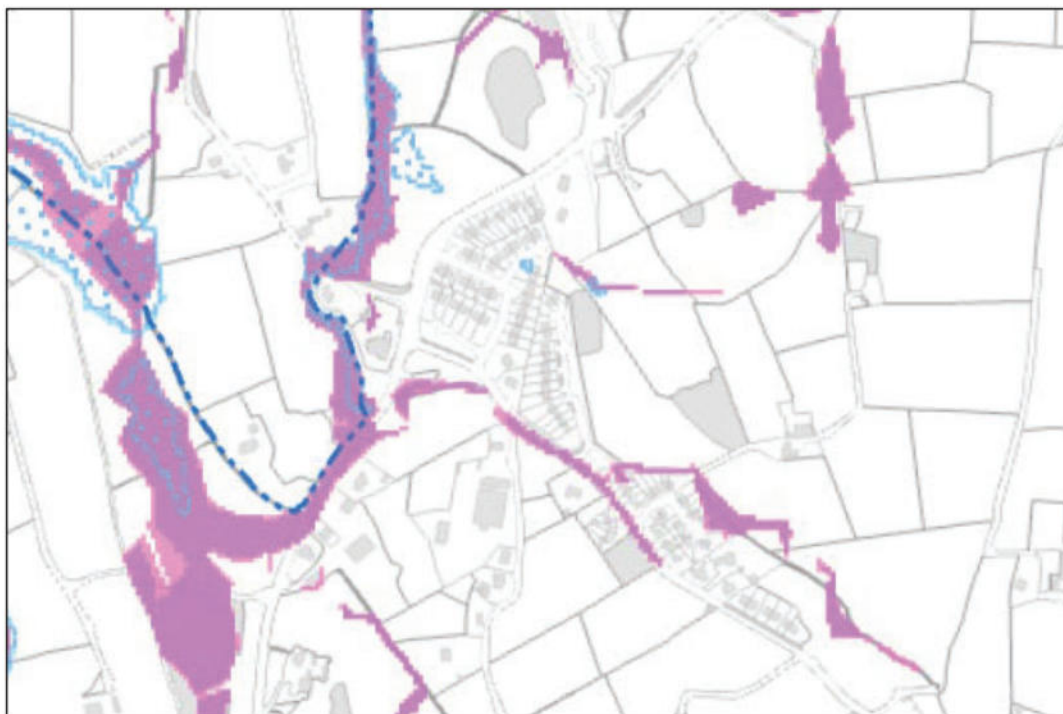


Figure 3: Flood Maps Sheeptown

- 2.17 Our clients' lands (Appendix 1) are relatively free from any flood risk. They are also well connected to the Rathfriland Road and the Glenvale Road. Development in this location would consolidate the settlement form and enable development to be accommodated without any unacceptable impact on the rural character of the rural area, in line with the objectives of the DPS, RDS and SPPS.
- 2.18 Should the LDP fail to properly consider the option of additional development lands at Sheeptown to deal with the rural development pressure identified, the LDP would be unsound in that it would fail the soundness tests in respect of:
- 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

3.0 CONCLUSIONS

- 3.1 The Council has identified a high level of rural development pressure in the Crotlieve DEA generally and in the area surrounding Sheeptown in particular.
- 3.2 The DPS is tasked with bringing forward policies that address such pressures to ensure that the correct balance is achieved across the settlement hierarchy. Making additional provision within small settlements will assist in reducing pressure for one-off houses in the open countryside, allowing rural dwellers to remain in their local area and at the same time minimise impacts on the character of the rural area.
- 3.3 Our client lands on the east side of Sheeptown are well suited to development in that development tin that location would consolidate the development footprint of Sheeptown and be well screened from view from public roads. It would alleviate pressure on the lands immediately surrounding the settlement and provide for a clearer distinction between the settlement and its rural hinterland.
- 3.4 Such a development would further support existing community and commercial facilities in the settlement.
- 3.5 We respectfully request that the Council to carefully consider this proposal, taking account of the concerns raised in this submission and we would welcome the opportunity to discuss this matter further.
- 3.6 Our clients request that they are represented in any inquiry process to discuss these matters further.



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APPENDIX 1: Subject Lands

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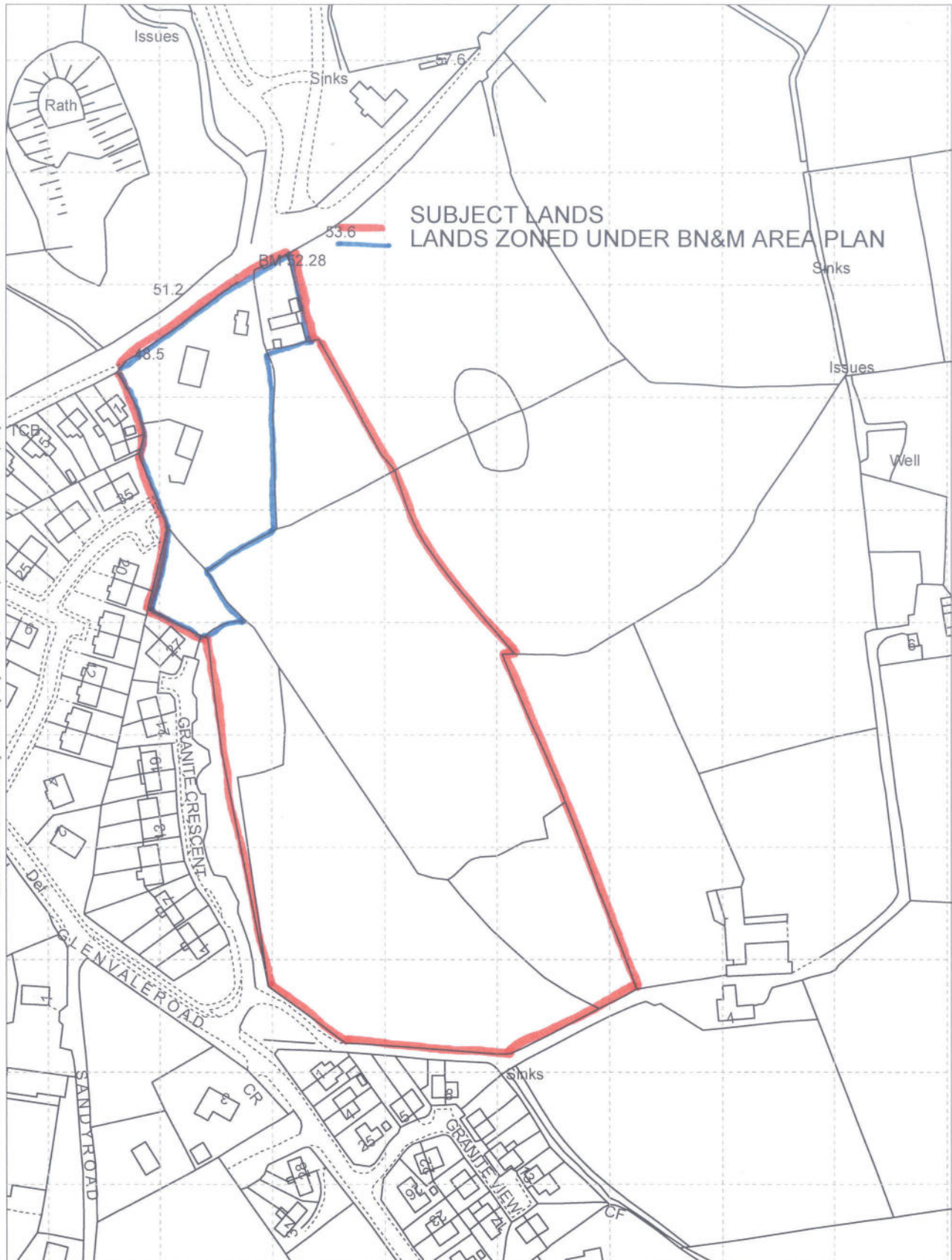
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