

**Date: 1 September 2025**

**Planning Service Department  
Newry, Mourne and Down District Council  
O'Hagan House  
Monaghan Row  
Newry  
BT35 8DJ**

Dear Sir/Madam,

I am writing in response to the public consultation on the Newry, Mourne and Down District Council Local Development Plan 2035 (Draft Plan Strategy June 2025), and in particular to raise concerns regarding the current settlement development limit (SDL) for Darragh Cross, and to request the SDL be extended to include the land outlined in red in Figure 1 attached.

### **Subject Site Context**

The land we wish to have included within the SDL lies immediately adjacent to the current development boundary (shown in blue) and is a natural extension of the village core. It is bounded on two sides by existing housing and has direct access to road infrastructure. As landowners of the land in question, we confirm our willingness to support its possible **future residential development** in order to help meet the housing needs of Darragh Cross and the wider area.

Importantly, the land is well positioned to benefit from future investment in wastewater infrastructure. As outlined in the Draft Plan Strategy:

*"NI Water have identified current capacity issues in parts of the Annsborough, Ballynahinch, Cranfield, Downpatrick, Dundrum, Kilkeel, Maghera (Down), Newry and Saintfield wastewater networks. The Council continues to work with NI Water to ensure that future investment in the district's infrastructure is aligned with the proposed spatial growth strategy."*

Given that Darragh Cross is served by the Saintfield wastewater treatment network, the proposed upgrade in capacity represents a timely opportunity to plan positively for future growth in the settlement. Inclusion of the land in question within the SDL, or as a Housing Policy Area, would allow the Council to align spatial growth in this part of the district with planned infrastructure improvements.

### **Policy Justification and Local Need**

We acknowledge the Council's current approach outlined in the Draft Plan Strategy:

*"It is not the Council's practice to zone lands for specific purposes within villages and small settlements."*

However, the strategy also provides scope for identifying:

*"Housing Policy Areas (HPAs)... where they will make a key contribution to the amount of housing growth allocated to a village or small settlement."*

We believe the proposed land satisfies this objective for the following reasons:

- The site provides a logical infill opportunity, integrating with the existing settlement form without extending into the open countryside.

- It supports the principles of sustainable development and rural housing need without contributing to ribbon development or undermining the settlement's rural character, in line with Policies COU1–COU11.
- The Council has identified a clear need for additional housing in Darragh Cross, and currently there are limited opportunities within the SDL for development.
- The lands location makes it suitable for consideration under 'Policy COU3 – Affordable Housing in the Countryside', which allows for housing adjacent to a village to meet the needs of the local rural community.

Additionally, we note with concern that:

*"Settlement Limits remain unchanged from those outlined within BNMAP and ADAP, except for those de-designated settlements."*

This means that Darragh Cross has seen no revision to its settlement boundary for over a decade, despite changes in population needs, infrastructure capacity, and national and regional planning priorities. Given the clear potential for modest and sustainable growth in the village, this area should be reconsidered at this stage.

### **Alignment with Strategic Planning Objectives**

This proposal is also consistent with broader strategic planning goals:

- SFG13 – Sustain rural communities living in smaller settlements and the open countryside
- RG7 – Support urban and rural renaissance
- RG8 – Manage housing growth to achieve sustainable patterns of residential development

Excluding this site, despite its suitability and sustainability, may be inconsistent with the objectives of the Rural Needs Impact Assessment Report and Section 1(1) of the Rural Needs Act (NI) 2016, which requires public authorities to consider the needs of rural communities in policy development.

### **Request for Consideration**

We therefore respectfully request:

1. That the Council extend the settlement development limit for Darragh Cross to include the land outlined in red in the attached map.
2. Alternatively (and only if request 1 cannot be made), that the site be designated as a Housing Policy Area (HPA) in the Local Policies Plan Stage.

The approach we are proposing supports the Draft LDP's vision of sustainable growth, local housing need, and infrastructure alignment. We would be grateful for the Council's consideration of this request and would welcome the opportunity to discuss this matter further during the consultation period.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

