

Dear Sir/Madam,

DfC HISTORIC ENVIRONMENT DIVISION RESPONSE to draft PLAN STRATEGY and SUSTAINABILITY APPRAISAL (INCORPORATING the SEA) REPORT

Please find attached the Historic Environment Division responses to both the draft Plan Strategy and draft Sustainability Appraisal incorporating the SEA released for public consultation.

At the outset of our response HED would like to commend Newry, Mourne and Down District Council for meaningful engagement and use of historic environment evidence informing the production of their development plan strategy. HED advise that on the whole we can see, through the published draft plan strategy documentation, how the historic environment evidence bases have been utilised and taken into account in informing the plan.

HED consider the Draft Plan Strategy (DPS) to be generally sound in respect of the Historic Environment. Where we consider that there is a need to make the plan strategy more sound having regard to the tests of soundness, we have stated same and we have articulated comments and provided suggested corrections. – We would ask that these comments are given close attention and considered carefully as there are important points of clarity that we advise need to be resolved. Our responses relate primarily to impact of the dPS on the Historic Environment, and the associated policy suite. Our not having provided comment on other sections of the dPS document should not be considered as an endorsement of proposals as we would expect other consultees to provide detailed comment as relates to their areas of expertise.

In addition, HED has provided comments in relation to some of the evidence papers to aid the council in making them more robust and to help in further consideration of the historic environment evidence bases in relation to zoning at Local Plan Policies stage.

We look forward to continuing to work with you through the LDP process and should you wish to discuss any of our comments within the attached documentation please contact us at the address below.

In relation to our response documents, we would request that email contact details, personal names and phone numbers be redacted when our response is published online. We would be grateful for an acknowledgement of receipt for this email.

Yours sincerely

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Supporting people, Building communities, Shaping places

Love Heritage NI <https://www.facebook.com/LoveHeritageNI/>
<https://www.instagram.com/loveheritageni/>



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 Last Name

Address

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	Department for Communities: Historic Environment Division		
Your Job Title / Position	Senior Archaeologist (also including comments from Senior Architect)		
Organisation / Group Address (if different to above)	Heritage Records and Designations Branch		
Address	HERONI		
	2 Titanic Boulevard		
	Titanic Quarter		
Town	BELFAST	Postcode	BT9 3HQ

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.

HED consider the draft Plan Strategy to be sound. We would however refer to our detailed response which highlights some minor inaccuracies in text which in our view should be corrected to make the plan more sound. Our comments have been focused on cultural heritage interests framed in the DPS.

We have also provided comment on the evidence bases and on the sustainability appraisal, which should be borne in mind in respect of the historic environment and especially as the plan moves toward local policies stage

Please note that HED comments are provided from 2 representatives within HED, as outlined in accompanying email.

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)	GP1, ENVS1, ENVS2, HOU2, HE1, HE5, HE7, HE11, LA03
<i>(and/or)</i>	
Relevant Section/Page Number	P11, P141-143, Section 7 - Monitoring & Review, Glossary
<i>(and/or)</i>	
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.

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.

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?

While HED consider some clear mechanisms have been articulated we have provided comment on monitoring specifically in the content of our response, articulating potential monitoring mechanisms /indicators to make it more robust and the plan more sound

Section L | Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

Do you have any comments on the SA?

Yes - see attached documentation.

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:



DfC Historic Environment Division

This submission relates to the Sustainability Appraisal incorporating Strategic Environmental Assessment for the Newry Mourne and Down District Council Local Development Plan 2035, Draft Plan Strategy, and to various evidence papers that touch on historic environment issues.

In relation to Strategic Environmental Assessment (SEA), DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA, whereby we provide comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage.

HED advises that this response should be read alongside our comments in relation to the draft Plan Strategy. Overall, we commend the Council on their engagement to date and on gathering and articulating the historic environment evidence toward informing plan strategies and policies. While we believe that the Sustainability Appraisal overall is a considered assessment of effects in relation to the historic environment, we would suggest the council may wish to assure themselves across of the scoring conclusions, which intimate generally that there are unlikely to be negative effects in respect of the historic environment from the LDP approaches, through enhancing the assessment narrative to make it more robust. We also note that some measures which are described in assessment could be appropriately described as mitigation, and that in general the narrative indicates that no mitigations will be required as no significant negative effects are perceived. The title and content in the row of the assessment tables "Measures to reduce Negative Effects and Promote Positive effects" implies there is a need and that the council have considered appropriate mitigation.

As will be seen below, across some parts of the assessment HED would consider that there might be potential for uncertain effects in some cases but that appropriate forms of mitigation can be considered, particularly in moving toward local policies stage. We would particularly highlight the need to more substantively consider the potential impacts on previously unidentified archaeological remains in assessment at local policies stage, for example where areas of previously undeveloped greenfield land are concerned. We consider that the potential effects in relation to such instances where this might arise as a result of the plan can be positive or negative, and might be best considered uncertain. Moreover, HED would highlight the opportunities at LPP stage to mitigate against potential negative effects further through being led by the historic environment evidence bases and development of appropriate key site requirements when it comes to zoning.

HED would highlight that with regard to the SA and various evidence bases such as Technical Supplement 7 on Countryside assessment, and inclusive of Landscape Character Review Settlement Appraisal that we consider that further work will be required using the continually evolving historic environment evidence bases toward informing the zoning of

sites and appropriate mitigation in a robust manner as the plan moves forward to Local Policies Stage.

Sustainability Appraisal incorporating SEA.

Page iv List of Abbreviations.

HPAG should read:

HPGD Historic Parks Gardens and Demesnes

3.2.2 Policy SETT 2 Strategic Designation SETT2 Settlement Development Limits

HED consider that the potential environmental effects of the policy may be positive or negative for the historic environment, but that there are opportunities to mitigate negative effects as recognised through being led by the historic environment evidence base in zoning at LPP stage and in the development of appropriate key site requirements, for example around archaeological assessment and evaluation.

3.3.1 Housing Strategy Policies

HS1 Housing Land Allocation, HS2 Protection of Land Zoned for Housing, and HS3 Management of Housing Supply.

Associated table pages 186-187. HED advise that while we can see the policy intent can be positive in encouraging reuse of buildings, the assessment text also appropriately recognises potential for encountering archaeological remains, and that Key Site Requirements (KSR) can be a mitigation at zoning stage. It would also be appropriate to refer to this possibility for mitigation in the mitigation measures section of the table.

3.7.3 Housing in the Countryside

Policy COU1 - Dwellings in Existing Clusters, Policy COU2 - Replacement Dwellings & Policy COU6 - Ribbon Development.

The appraisal of the scoring identifies positive effects for landscape and historic environment (Objectives 13 & 14). HED acknowledges that the policy approach of COU2 for replacement dwellings aligns with existing policy PPS 21 encouraging the retention and sympathetic reuse of non-listed vernacular dwellings in the countryside, but anecdotal evidence suggests these non-listed assets and their rural landscape settings continue to be compromised (as noted in Tech Supplement 12, para 4.14). As outlined in the HED DPS comments, monitoring the no. of vernacular dwellings replaced or sympathetically reused under policy COU2 would be appropriate to include as further measures to review the effectiveness of the plan against historic environment policy objectives, to inform any future changes.

3.7.7. Economic Development in the countryside

Policy ED2 Expansion of an Established Development Use in the Countryside & ED3 Redevelopment of an Established Economic Development Use in the Countryside

(and associated table page 265) HED note the neutral scoring afforded in relation to objective 14 and would again advise that we would consider the potential for positive and negative environmental effects of this policy in respect of cultural heritage and that an uncertain score might be warranted given potential for impacts on previously unidentified below ground archaeological remains. Again, alongside the plan policies appropriate KSR at LPP stage can help to mitigate potential effects

3.7.12 Tourism Development in the Countryside

TOU2 - Tourist Amenities in the Countryside, TOU3 - Hotels, Guesthouses, B&Bs, Tourist Hostels and Bunkhouses in the Countryside, TOU5 - Self Catering Accommodation in the Countryside, TOU6 - New and Extended Holiday Parks in the Countryside, TOU7 - New and Extended Glamping Accommodation in the Countryside.

The assessment of the above draft tourism policies identifies significant positive effects for landscape and positive effects for the historic environment. HED suggest a more robust assessment would also acknowledge the potential of tourism development/ expansion in the countryside to negatively effect historic landscape character and the setting of heritage assets within a rural context by way of landscape changes including removal of historic landscape features such as hedgerows, trees, stone walls, gates and gates posts etc. A heritage asset can also be a key tourism asset and development proposals have the potential for negative effects on the asset and its setting, where proposals may compromise its significance. HED therefore considers the assessment of likely significant effects on landscape and the historic environment may be more appropriately identified as uncertain. Further mitigation measures may include identification of heritage assets which are key tourism sites at the LPP stage and where relevant, key site requirements for land zonings.

3.7.13 Minerals Development

Policy MIN1 Minerals Development

Associated table 294-295 – HED advise that experience across Northern Ireland indicates the high likelihood of minerals exploration and quarrying encountering previously unidentified below ground archaeological remains. Alongside being led by the historic environment evidence base it is possible to consider key site requirements in zoning at local policies stage as mitigation of the LDP in addressing this potential effect.

Policy MIN6 – whilst we broadly agree with the scoring and recognise the traditional cutting of peat as a cultural tradition, HED highlight that in respect of SEA, table on p309) assessment of potential for environmental effects should have a particular focus on the potential effects on *archaeology and architectural heritage* in line with the specification outlined in Schedule 2 of the Environmental Assessment of Plans and Programmes (NI) Regulations 2004.

3.4.5. Transport Strategy

Policy TRS 1 Sustainable Transport

Associated table 314. In respect of the historic environment we highlight the importance of also considering the potential for environmental effects in respect of previously unidentified below ground remains.

Policy TRA2 Access to Public Roads & TRA 3 Access to Protected Routes

Associated table page 318. HED consider that the potential effects of this policy would be more appropriately considered uncertain. It should be noted that when historic features become “losses” as per the assessment wording, this is a strong negative in that their removal means they are normally lost forever from true context.

Policy TRA7 Car Parking and Servicing Arrangements, Policy TRA 9 Design of Car Parking Policy TRA 10 Provision of Public and Private Car Parks & Policy TRA11 Temporary Car Parks.

Associated table page 324. HED highlight that it would be appropriate to consider in the assessment text for objective 14, (as has been done for objective 13), the effects of landscaping on historic character and topography and on previously unidentified archaeological remains. We consider that a scoring of uncertain in respect of potential environmental effects in regard to cultural heritage might be more appropriate, but that mitigations could be applied through application of policy and development of appropriate key site requirements at local policies stage

3.7.16 Telecommunications and Other Utilities

Policy TCU3 Public Services and Utilities

Associated table page 333. HED highlight that EIA (considered in assessment text beside objective 12) also applies in respect of cultural heritage, and might therefore also merit reference as a potential consideration in respect of the historic environment. We would also highlight however that EIA is required by legal obligation, in respect of certain types of development proposal rather than being a mitigation that the plan can necessarily bring forward in its own right.

3.7.18 Renewable and Low Carbon Energy

Policy RE1- Renewable Energy & Policy RE2- Renewable Energy Technology and Energy Efficiency Measures in New Development

Associated Table page 347. We note the comment on assessment that there could be potential to encounter archaeological finds in the course of new development – We welcome this iteration here and as per comments elsewhere would welcome its consideration more

broadly in the assessment to make it more robust. While there are positives in identifying new sites, their destruction or wholesale removal can be a significant negative.

3.7.20 Flood Risk and Drainage

Policy FRD4 Artificial Modification of Watercourses

Associated assessment table page 368. HED note the focus of the assessment narrative (Summary and comparison of options against Sustainability Objectives) on features of natural heritage. We advise that many cultural heritage features including millponds, mill races, fishponds, and canals (including the scheduled Newry Canal), are watercourses in themselves, while other features such as bridges, fords, crannogs, and causeways may be associated with watercourse features. We consider that the potential for effects, and mitigation of such in relation to watercourses of cultural heritage significance could perhaps be expanded on.

3.8.1. Historic Environment

Policy HE1 The Preservation of Archaeological Remains of Regional Importance and their settings HE2 The Preservation of Archaeological Remains of Local Importance and Their Settings HE3 Archaeological Assessment and Evaluation & HE4 Archaeological Mitigation

(associated table page 363). With respect to assessment in relation to effects of the policy in respect of material assets, HED would consider that an uncertain score may be appropriate. As well as infrastructure and economic assets material assets include assets of natural and cultural significance which should be sustained via the policy application. HED highlight the opportunity in developing bespoke policy for ASAs at Local Policies Stage to manage and balance changes to these landscapes that sustain their distinctive historic landscape character and integrity. Each ASA has its own individual special characteristics and constraints that apply in one might not necessarily apply in another.

Policy HE6 Change of Use of a Listed Building, Policy HE7 Extension or Alteration of a Listed Building, Policy HE8 Advertisements on a Listed Building, Policy HE9 Demolition of a Listed Building & Policy HE10 Development affecting the Setting of a Listed Building

Scoring narrative against objective 3 appropriately acknowledges the benefits and potential of listed buildings to contribute to good quality, sustainable housing, through adaptation, extension and reuse though scoring is 0 - no overall effect. Given that many listed buildings are residential properties or can be adapted for residential use, HED consider a positive score would be more appropriate.

In addition to the measures described, the utilisation of DfC HED guidance referenced in the DPS and HED Conservation Principles to further inform the DPS HE policies, could further support positive effects for listed buildings and the historic environment.

Policy HE11 - New Development in a Conservation Area or Area of Townscape Character,

Policy HE12 -Advertisements in a Conservation Area or Area of Townscape Character &
 Policy HE13 - Demolition in a Conservation Area or Area of Townscape Character

HED note a conflict in the 'Option' heading which suggests that the review of ATC's will be undertaken separately from the LDP process. As ATC's are a plan designation, HED would expect that a full ATC review will be undertaken at the LPP stage as referred in the heading 'reasonable alternatives'.

Policy HE15 - Enabling Development

HED considers reference to the retained DfI Best Practice Guidance to PPS 23 'Assessing Enabling Development for the Conservation of Significant Places' would be relevant as a measure to reduce negative and support positive effects.

Monitoring

Page 145. 3 (c). Provide good quality sustainable housing

HED refer to comments on the DPS towards providing a robust evidence base to inform the no. of replacement dwellings approved, including individual stats on the no. of replacement vernacular dwellings granted. The loss of vernacular heritage remains an ongoing concern across Northern Ireland (as referenced in Tech Supplement 12 para 4.14) and noting the particularly rich vernacular heritage of the district, it would be important that monitoring stats are suitably granular to inform the effectiveness of the policy protection. This monitoring information will provide an important evidence base to inform any future policy amendments at the plan review stage.

Page 149. 14. Protect conserve and enhance the historic environment and cultural heritage

HED would refer to our comments on the Plan Strategy in respect of making Indicator C in relation to ASAI more robust. Changes need to be monitored here with respect to their potential negative effects on the distinctive historic landscape character and topography of the ASAI's. – As well as factoring in approvals contrary to policy provisions, it would be appropriate as is the case with Indicator A, to consider approvals which are contrary to the advice from HED.

SA Scoping Report

HED welcome the updating of the scoping report – we have articulated further comment below toward making it and the plan more robust at local policies stage and implementation

Page 152 – For accuracy and consistency the heading “Areas of Special Archaeological Interest” should read **Areas of Significant Archaeological Interest** as per strategic policy SPSS 6.29 language and the draft plan strategy.

Historic Parks, Gardens and Demesnes

HED highlight the recent publication and launch of the updated Register and associated Guidance. Cognisance of the evolving register and our other records will be important as the plan moves forwards to local policies stage. See at [Historic Parks, Gardens and Demesnes | Department for Communities](#)

5.14.3

HED highlight that the content of the second paragraph requires amendment. Areas of Archaeological Potential are not *designated* through the plan, but as with other Historic Environment Records, maintained by the Department (like the Sites and Monuments Record, or the Register of Historic Parks and Gardens) may be *identified* or *highlighted* in it.

We also highlight the recurrence of the term *special* rather the *significant* in respect of ASAI and advise correction for consistency.

5.14.4. Key Sustainability Issues for Historic Environment and Cultural Heritage

HED advise that the potential for impact on previously unidentified archaeological remains, for example on greenfield sites adjoining settlements merits consideration as a sustainability issue.

Appendix 2: Sustainability Objectives and Relationship to SEA Topics

HED consider that the SEA Directive Topic Cultural Heritage has a strong relationship with the sustainability objective 13, maintain and enhance landscape character. Recognition of this is vital given the synergistic relationship between the historic environment and how it has shaped much of the landscape character we perceive today, from monuments and buildings to boundaries, routeways and field systems.

Appendix 3: Compatibility Of The Sustainability Objectives

As outlined in our scoring comments for 3.8.1 Historic Environment HE1-HE4, HED considers objective 14 to protect, conserve and enhance the historic environment and cultural heritage, has a direct relationship with objective 6, to manage material assets sustainably, as natural and cultural heritage assets are in themselves material assets.

HED Representation on the Sustainability Appraisal inc. SEA for the Newry, Mourne and Down District Council LDP: Draft Plan Strategy (June 2025)

HED would also highlight that industrial heritage sites such as power stations and waterways can support existing utility infrastructure and be impacted by associated development. Renewable energy development proposals e.g. onshore and offshore wind and associated infrastructure may also have the potential for direct and indirect impacts on heritage assets and their settings and on historic landscape character.

Industrial heritage features such as canal towpaths, disused railway lines and historic routeways can also provide opportunities to establish or enhance greenway infrastructure, improve connectivity between established routes and encourage active travel, which as outlined in section 5.8 is encouraged through the plan. HED therefore considers the relationship between objective 8 to encourage active and sustainable travel and objective 14 should be acknowledged Appendix 3 matrix.

Appendix 5: Sustainability Appraisal Guide for Newry Mourne and Down District Council Draft Plan Strategy.

Pages 239-240 Key Issues in relation to the cultural heritage objective. – HED again highlight as a key issue the need to ensure that measures can be implemented in order to identify, and mitigate impacts on, previously unidentified archaeological remains. – Policies on evaluation and mitigation help to assist in addressing this, alongside key site requirements that might be brought forward at Local Policies Stage of plan making.

Technical Supplement 7 Countryside Assessment

Appendix 7.a Landscape Character Review

The historic environment is inseparable from the landscape and natural environment in that the landscape in Northern Ireland has largely been shaped by thousands of years of human activity and modification. We consider that enhanced recognition of historic landscape characteristics and cultural heritage evidence will be vital at local policies stage, particularly in the context of new zonings.

The landscape in the District has a hugely rich and varied cultural heritage dimension, articulated for example through historic settlements, castles (some of the most important examples in Ulster) and churches. Consideration of HED's various heritage asset datasets, and particularly including ASAI, (which are themselves particularly distinctive areas of historic landscape), will enable recognition of the trends which have shaped the District's landscape and the routeways through it, e.g. the strong Anglo Norman influence reflected in heritage assets and placenames, or the key early Christian heritage. Recognition of these arterial historic landscape narratives alongside what they add to perception in the landscape will provide a more solid foundation for place-shaping on the basis of understanding context.

As the plan progresses to LPP stage HED therefore advise further usage of our Historic Environment Digital Datasets to understand and articulate these trends, even in a general sense for each landscape character area, to more comprehensively appraise landscape sensitivities and forces for change. This would enable recognition of Key Issues around cultural heritage such as, for example, a need to sustain surviving vernacular architecture, or the need to preserve the hilltop setting of early medieval raths. We note the biodiversity and geodiversity updates that have been undertaken but consider that the failure to address the

historic environment more substantively in carrying out the review leaves a gap that needs to be addressed moving forwards.

HED also suggest that deeper analysis of the historic landscape character of Downpatrick and the historic evolution of the town in medieval times, against the ancient shoreline may also be important in considering future aspects such as Climate Change and Flooding as the plan progresses to local policies stage.

Table 5. HED note that Historic Parks and Gardens are considered under the Biodiversity Profile, rather than historic environment, and note in the table on Page 13 that the data source is listed as the local authority. We would advise that HED are the data source for this information and that it is important to ensure that up to date datasets are utilised. We would advise that while there is cross over with biodiversity, the historic environment significances of these designed landscapes are a key consideration in their inclusion on the Register.

Appendix 7.b Settlement Appraisals

We recognise that the content in reference to settlements in Appendix 7.b Settlement Appraisals, does touch somewhat on historic environment issues, but this is unfortunately inconsistent with the broader Countryside Assessment. The lack of reference to historic environment datasets in relation to the wider rural landscape in Appendix 7a -Landscape Character Review, means that a much more limited picture is produced in terms of analysis of landscape characteristics.

In respect of the Settlement Appraisal HED would strongly advise cognisance of the Gazetteer of Nucleated Historic Urban Settlements to strengthen this in a revision as the plan moves toward Local Policies Stage. The entries in the Gazetteer provide a strong contextual narrative for the evolution of settlements and form a good foundation for place shaping. Several settlements in this District have demonstrable and important medieval origins including the ancient town of Downpatrick, and the medieval port of Ardglass which retains an array of medieval fabric, while other historic settlements including Newry owe their broader expansion to the industrial era.

Technical Supplement 12: Historic Environment

HED considers this paper to be generally good as an overview of the historic environment of the district in relation to the plan.

HED advise that aspects of the historic environment that are important to consider in planning also include undesignated heritage assets such as historic boundaries, including townland and parish boundaries, historic routeways and plantings, previously unidentified archaeological remains and vernacular and other historic structures in the landscape. These, although undesignated, are vital components of historic place and character which the local development plan can help in protecting, conserving and enhancing. Below are a few further comments that we consider will help strengthen the document to inform the local policies stage of plan development.

2.0 Policy Context

HED consider that it would be appropriate to reference the various international conventions (for consistency with scoping report) which we implement in NI through our policy and legislative approaches to cultural heritage and planning. We would also advise at the level of local legislation that cognisance of the Environmental Assessment of Plans and Programmes (NI) Regulations 2004 and The Planning (Environmental Impact Assessment) Regulations (NI) 2017 would be appropriate

2.23 – Under the Historic Environment Division Guidance Documents it would be appropriate to include Conservation Principles Guidance (Guidance for the sustainable management of the Historic Environment in Northern Ireland. - We consider this to be critically important given the protect, conserve and enhance thrust of the plan's objectives in relation to the historic environment.

4.0 District Profile

HED advise, that as with the scoping report this paper should make reference to the Defence Heritage Record for the District, which contains numerous assets spanning WW1, WW2 and the Cold War. Both Industrial and Defence Heritage assets should be considered as sites of local importance (SPPS 6.9 would apply) as they fall under the definition of a monument articulated in the Historic Monuments and Archaeological Objects (NI) Order 1995. Local Landscape Policy Areas have and can be designated around these features.

4.5 We note the references to proposals for scheduling originating within NIEA –This is a dated reference and should rather read HED.

4.13 Please be advised that the link to the Register of Historic Parks Gardens and Demesnes should be [Historic Parks, Gardens and Demesnes | Department for Communities](#)

4.21 HED advise that numbers here (and across other records held by the Division) may be subject to change as the plan moves towards local policies stage, and that updating will be required.

4.23 HED clarify that details of all designated Conservation Areas (including conservation area maps and design guides) are available to view on the DfI website, [Conservation Area Guides \(A-Z list\) | Department for Infrastructure](#) rather than in development plans.

Other comments

Archaeological Excavations. It will be prudent as the plan moves toward local policies stage to consider areas where extensive archaeological remains have been encountered through development led archaeological work as a result of planning conditions. In some cases this will have implications for the archaeological potential of adjoining lands which may be considered for zoning. Information in relation to excavations that have occurred can be gleaned from the Historic Environment Record of Northern Ireland (formerly the Northern Ireland Monuments and Buildings Record).



DfC Historic Environment Division

**This representation relates to the following Development Plan Document:
Newry, Mourne & Down District Council Local Development Plan 2035 – Draft
Plan Strategy (June 2025)**

Cognisant that the plan will be read “in the round” taking relevant policy suites into account DfC Historic Environment Division considers the Newry, Mourne and Down District Council Local Development Plan 2032, draft plan strategy to be generally sound in respect of the policies relating to the historic environment. We strongly recommend that the council considers our response thoroughly, particularly where we have advised that policies ought to be made ‘**more sound**’.

Overall, the Council is commended on the comprehensive strategic approach, structure and format of the document and use and application of their historic environment evidence to inform plan strategies and policies. HED has welcomed the engagement through the plan process to date and encourages further consultation as the plan moves forward to the Local Policies Plan stage. HED would however advise that further work is required with regard to Landscape Character Assessments to inform appropriate consideration of land zoning proposals, at the next stage of the plan. Our comments on this and other historic environment related evidence bases, may be found in our response to the Sustainability Appraisal, including the Strategic Environmental Assessment sent as a separate document.

Our response has been provided in a narrative format. Where it is considered that some of the draft policies can be made “more sound”, a rationale is provided against the soundness criteria and suggested amendments and/ or comments provided, for review by Council.

HED Editorial note:

The following key has been applied throughout the response when indicating suggested corrections and/or amendments to the text:

- Policies – Policy text is **emboldened**. Where we have suggested corrective text to make the policies sound this is **emboldened** and underlined.
- Justification and Amplification text – Justification text is in *italics*. Where we have suggested corrective text to make the justification text sound this is in *italics* and underlined.
- Within the justification and amplification text for clarity, amendments and/or corrections to the existing items are provided in the first instance, with proposed new additional items inserted thereafter. However, this does not imply a preferred order of preference.

Using the Draft Plan Strategy

Page 11 Environmental Designations

HED highlight that Areas of Significant Archaeological Interest, Scheduled and State Care Monuments and Listed Buildings of Special Architectural or Historical Interest also constitute environmental designations. We note the footnote link to the NIEA: Natural Environment Map Viewer and advise in the interests of consistency (soundness test **C3**) and making the plan more sound that it would be appropriate to insert a link to the [DfC Historic Environment map viewer](#)

Part 1

5 Spatial Growth and Strategic Policies

Historic Environment and Natural Heritage Strategy

Page 141 Historic Environment and Natural Heritage Strategy

HED welcomes the plan approach to group the natural and historic environment strategic policies, acknowledging their interrelationship. HED however considers the supporting text could further elucidate this synergistic relationship and provide a supporting narrative which recognises the particular natural and historic environment features distinctive to the district, including key heritage assets and its bespoke landscape character and coastline. As an example, the District here presents an array of particularly distinctive historic environment themes across its varied landscapes, (e.g. along the coast from Greencastle, to Dundrum, through Lecale, Ardglass and then along the west coastline of Strangford Lough the District presents one of the most striking narratives of the Late Medieval period to be found in Ulster reflecting the ancient maritime connections of the region).

In the interests of making the plan ‘**more sound**’ (**consistency tests (C3)**) the supporting text on pages 141, 142 & 143 may be more appropriately placed under ENV51 which relates specifically to the historic environment.

Similarly, supporting text which relates to the natural environment, pages 145,146 & 147 may be more appropriately placed under ENV52 page 148.

Page 144. Policy ENV51

To ensure that the strategic policy ENV51 applies holistically to the historic environment, i.e. is applicable to heritage assets not specifically identified in the policy title, e.g. unlisted vernacular buildings, historic buildings of local importance, HED consider the following insert would be ‘**more sound**’ (**consistency tests (C3)**) and **coherence and Effectiveness test (CE2)** and more closely align with RG11 of the Regional Development Strategy (RDS) and SPPS para 6.4 first bullet point, as below:

The Plan will support development proposals which seek to protect, conserve and where possible enhance the historic environment including Archaeological Remains and Their Settings, Monuments and Areas; Historic Parks, Gardens and Demesnes; Listed Buildings; Conservation Areas; and Areas of Townscape Character (ATCs).

J&A LDP Historic Environment Designations (third paragraph)

HED advise of some important factual inaccuracies in the content of this paragraph. We advise that ASAI may be identified by Historic Environment Division in consultation with the Historic Monuments in line with the requirements of SPSS6.29 but that they are designated by the council through the LDP.

Similarly, we highlight that HED compile a Register of Historic Parks, Gardens and Demenses and identify Areas of Archaeological Potential within the Historic Environment Record of Northern Ireland. These are not designations but may be highlighted or identified within the plan strategy alongside sites and monuments and Listed Buildings.

We advise that the amplification text needs to be amended in order to make the policy text itself **'more sound'** (**consistency tests (C3) and coherence and Effectiveness test (CE2)**) as per below

HED advise that the content which presently reads

Areas of Archaeological Potential (AAPs), Areas of Significant Archaeological Interest (ASAI), Archaeological Sites and Monuments, Historic Parks Gardens and Demesnes, and Listed Buildings are designated by the Department for Communities Historic Environment Division and are incorporated into the Plan Strategy.

*Should be **removed/deleted** and **replaced** with*

Areas of Significant Archaeological Interest are identified by the Department for Communities Historic Environment Division and are designated through the LDP. Other assets within the Historic Environment Record of Northern Ireland, compiled by Historic Environment Division, including Areas of Archaeological Potential, Sites and Monuments, Historic Parks, Gardens and Demesnes and Listed Buildings are incorporated within the Plan Strategy.

Page 165 - 6. GENERAL POLICY AND OPERATIONAL POLICIES Policy GP1

Impact Assessments

HED advise that 'Heritage Impact Assessments' (HIA) should be included in the list of information which may be required to inform consideration of the impacts of the proposals on the significance of any heritage assets affected by development and where relevant, measures proposed to mitigate the impact.

Page 174 HOUSING IN SETTLEMENTS – Policy HOU2 Design Concept Statements and Concept Masterplans

HED Suggest the inclusion of the following bullet point to ensure historic environment considerations inform the concept and design development of housing schemes:

- *An analysis of the historical development of the site identifying any heritage assets affected by the development, demonstrating how they have informed the conceptual design.*

Part 2

6. General Growth and Strategic Policies

21 Historic Environment

Policy HE1 The Preservation of Archaeological Remains of Regional Importance and Their Settings.

Page 327. HED advises that factual inaccuracies in some of the J&A content on this page, need to be corrected, (**consistency test (C3)**) in order to make the plan ‘**more sound**’.

The language in the first paragraph of J&A in relation to Archaeological Remains is not accurate in reference to ASAI. This paragraph presently reads:

State Care and scheduled monuments, along with ASAIs together represent those archaeological sites, monuments, and archaeological areas which are of greatest importance within the district, and as such benefit from statutory protection.

The last sentence is factually inaccurate and HED strongly advise that it should be removed. Please refer to SPPS 6.8 in relation to ASAI “...such sites, or constituent parts of them may benefit from statutory protection”. HED advises that ASAI, while regionally important as per SPPS 6.8, are not themselves statutorily protected, - they are designations of particularly distinctive historic landscape (SPPS 6.29), made through the LDP by local authorities. Given their scope, they usually do contain scheduled or state care monuments which do have statutory protection.

HED advises that this content should be amended to read as follows:

State Care and scheduled monuments, along with ASAIs together represent those archaeological sites, monuments, and archaeological areas which are of greatest importance within the district. ~~and as such benefit from statutory protection~~

Page 328. HED advise that the first sentence on this page contains a factual inaccuracy and also conflicts with the second sentence. This first sentence reads

Once a site or monument has been scheduled it benefits from statutory protection and scheduled monument consent is required from the Council for any works affecting it.

HED advise that under Article 5 of the Historic Monuments and Archaeological Order (Northern Ireland) 1995, only the Department for Communities are empowered to grant scheduled monument consent (as is intimated by the second sentence of the J&A). In order to make the text more sound (in accordance with **consistency test C3 and coherence and effectiveness test CE2**) HED advise that this should be amended to read.

Once a site or monument has been scheduled it benefits from statutory protection and scheduled monument consent is required ~~from the Council~~ for any works affecting it.

Policy HE5 Historic Parks, Gardens and Demesnes

Page 333 Para 4. HED clarify that the updated Register of Historic, Parks, Gardens & Demesnes is available to view at [Historic Parks, Gardens and Demesnes | Department for Communities](#). The accompanying guidance outlines the rationale for the new grading system and clarifies that all sites are now contained within the Register. Grade B categorisation identifies those sites which would previously have been assigned to the appendix of supplementary sites (as per SPPS 6.29).

Policy HE7 Extension or Alteration of a Listed Building

Page 336 Para 3. HED consider it would be appropriate to reference the following HED guidance which can inform decision making on planning and listed building consent applications relating to retrofitting and thermal upgrade of listed and historic buildings.

Retrofitting traditional buildings <https://www.communities-ni.gov.uk/publications/retrofit-traditional-buildings-what-consider-when-planning-future>

Thermal upgrade of traditional buildings <https://www.communities-ni.gov.uk/publications/thermal-upgrade-traditional-buildings>

Policy HE11 New Development in a Conservation Area or Area of Townscape Character

Page 341 Para 2. J&A The policy text affords a measure of flexibility through the use of the word ‘**normally**’ i.e. ‘In a Conservation Area, the Council will ‘**normally**’ only permit new development where the proposal enhances the character or appearance of the area where an opportunity to do so exists or preserves its character or appearance where an opportunity to enhance does not arise.’

HED considers that the J&A Para 2, could be ‘**more sound**’ (**consistency test C3**) by providing further clarification in line with Para 6.18 of the SPPS that the policy presumption against the grant of planning permission for development which conflicts with the policy approach, ‘should only be relaxed in exceptional circumstances where it is considered to be outweighed by other material considerations grounded in the public interest.’

Policy LA3 Local Landscape Policy Areas

Page 360 J&A -Minor grammatical change. HED advise that the last sentence of the first paragraph should include the word “are” rather than “is”

This presently reads:

They may include but is not limited to:

But should read:

They may include but is-are not limited to:

7. Monitoring and Review

Environmental: Protecting and Enhancing the Historic Environment and Natural Heritage.

Page 374 Number of planning approvals for conversion or replacement of existing buildings in the countryside.

HED consider this monitoring indicator could be divided to separately monitor the
- Number of planning approvals for replacement dwellings in the countryside (including stats for no. of replacement vernacular dwellings) and

- Number of approvals for conversion of existing buildings in the countryside

towards more robust monitoring (**Coherence and Effectiveness text (CE3)** of the historic environment objective No. 2. *To protect, conserve and enhance the districts heritage assets and promote their sensitive re-use.* As acknowledged in Tech Supplement 12 para 4.14, the loss of non-designated vernacular heritage remains a concern and this monitoring information can inform the effectiveness of the policy protection and any required amendments at the plan review stage.

Page 382 Changes within Areas of Significant Archaeological Interest

HED advise that the monitoring indicator could be made more sufficiently robust in line with **Coherence and Effectiveness text (CE3)** if the Review Trigger were amended to read.

More than one application approved in any one year contrary to HE1-HE2 and to advice received from DfC HED.

Page 383. HED advise that the second row in table 4 repeats the monitoring for Changes within Areas of Significant Archaeological Interest and that this row should be removed.

Glossary

HED recommends including the following definitions:

- **‘Heritage Asset’**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

- **‘Designated Heritage Asset’**

A World Heritage Site, State Care Monument, Scheduled Monument, Area of Significant Archaeological Interest, Listed Building, Conservation Area, Area of Townscape/Village Character, Local Landscape Policy Area or Protected Wreck Site.

HED also recommends amending the following definitions as below:

- **Areas of Significant Archaeological Interest**

The current text here is factually inaccurate in that ASAI’s are not designations of the setting of monuments.

HED advise in the interests of soundness (**Consistency test C3 and Coherence and Effectiveness Test CE1**) that the existing text definition should be removed and replaced with text which accurately describes what ASAI are. See below -SPPS 6.29 refers:

Particularly distinctive areas of the historic landscape in Northern Ireland

- **Listed Building:**

In the interests of soundness (Consistency test C3) HED also recommends amending the definition of listed buildings to clarify the designation test relates to ‘*special architectural and historic interest*’, as per Section 80 of the Planning Act (2011).

A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic Interest under Section 80 of the Planning Act (NI) 2011.

- **Design and Access Statement:**

HED suggests the definition of a Design and Access Statement is reviewed to include access considerations in line with legislation and DfI Development Management Practice Note 12.

A Design and Access Statement [D&AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users.

- **Scheduled Historic Monuments**

We further suggest given the specific legislative requirements around works affecting them that a definition for Scheduled Monuments be included.

Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.

General Comments

Given the thrust of the historic environment policy suite toward conservation (the management of changes to a heritage asset in a way that sustains or enhances its significance) Council may wish to make reference to the HED Conservation Principles Guidance [Conservation Principles guidance | Department for Communities](#)

Supplementary Planning Guidance

HED advises it would also be appropriate to reference the above Conservation Principles guidance in the supporting SPG document Chapter 23.0 Alteration, Extension and Maintenance of Listed Buildings. HED acknowledge that this chapter has been informed by the evidence bases contained in PPS6 Annex E, which identifies three guiding principles for conserving historic buildings. While these principles remain relevant, it is important that the management of change to a heritage asset is informed by a holistic understanding of its significance and its cumulative heritage interests or values. This conservation led approach can ensure development and change proposals are well informed, based on sound evidence and realise opportunities to enhance the understanding of the asset and support its sustainable and sympathetic reuse, in the case of historic and listed buildings.