



# 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

Last Name

Address

Gravis Planning

1 Pavillions Office Park

Kinnegar Drive, Holywood

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		
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*)

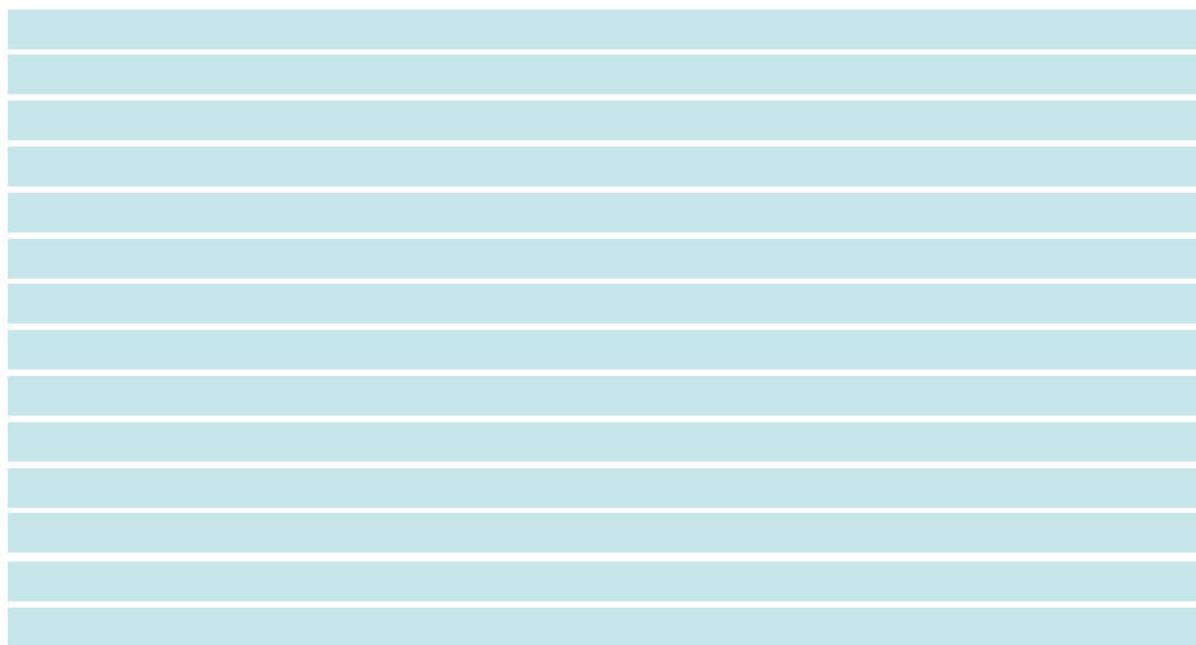
Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as 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.



## 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 \(infrastructure-ni.gov.uk\)](http://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)** SGS1, SETT1 & 2, HS1 AND HS2

**(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.

Please see attached correspondence relating to the upgrading of Saintfield to a small town and the limited capacity for growth within existing settlement limits.

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.

It is acknowledged within the Draft Plan that allocations for small towns such as Saintfield that have recently been upgraded from village status will be examined at local policies stage. It is considered that Plan Strategy Stage offers the best opportunity to make strategic provision for increased housing and associated growth.

## 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?

We agree with the mechanisms proposed, however, a realistic allocation should be made for Saintfield.

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

Do you have any comments on the SA?

No

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:

BY EMAIL22<sup>nd</sup> September 2025

Our Ref: C05778

Planning LDP Team  
 Newry, Mourne and Down District Council  
 Downshire Civic Centre  
 Downshire Estate  
 Ardglass Road,  
 Downpatrick  
 BT30 6GQ



Dear Sir/Madam,

**Re: Newry, Mourne and Down District Council Local Development Plan – Response to the Draft Plan Strategy relating to lands located on Ballynahinch Road, Saintfield**

This letter is submitted on behalf of our client [REDACTED] and relates to the publication of the Newry, Mourne and Down District Council draft Plan Strategy, which was launched by the Council on Friday 27<sup>th</sup> June 2025. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this, we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 *Has the Development Plan Document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 *Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 *Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 *Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 *Did the council take account of the Regional Development Strategy?*
- C2 *Did the council take account of its Community Plan?*
- C3 *Did the council take account of policy and guidance issued by the Department?*
- 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?*

### Coherence and Effectiveness Tests

- CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 There are clear mechanisms for implementation and monitoring; and*
- CE4 It is reasonably flexible to enable it to deal with changing circumstances.*

### District Profile

*The 2021 Census states the total population of Newry, Mourne and Down District Council increased by 6.1% from 171,533 to 182,074 between 2011 and 2021. The total population has further increased and is estimated to be 189,000 in mid 2028. This trend is expected to continue through the plan period with a projected increase to 193,746 by 2035. This represents a 6.6% increase within the plan period.*

### Newry, Mourne and Down District Council Vision

*“Newry, Mourne and Down is a place with strong, safe, and vibrant communities, where people enjoy a good quality of life and equality of opportunity for all. A sustainable, well connected and high-quality place where our environment and cultural heritage are valued and protected to make the district an attractive place to live, work, invest and visit.”*

We **support** this vision as it reflects the Council aspirations for the area where people will enjoy a good quality of life with an equality of opportunity for all. It sets out that the Council will plan for a sustainable, well connected, high-quality development, whilst protecting the environment and cultural heritage.

### Spatial and Cross Cutting Objectives

The LDP aims to deliver its vision through the main strategic objectives which are categorised broadly into spatial/cross-cutting objectives; economic development objectives; social development objectives and environmental objectives.

We are **generally supportive** of these objectives in principle specifically the social objectives aimed at *‘Accommodating People, Creating Quality Places and Improving Health and Wellbeing’*. The criterion’s objective is to protect and sustain the role of local and small towns so they act as local centres for housing and community services.

We **disagree** with the detail of some of the objectives specifically relating to housing allocation, although further discussion on the relevant strategic policies will be discussed in detail later within the representation.

### **Spatial Growth Strategy**

The Northern Ireland Statistics and Research Agency (NISRA) census data highlights that the number of households in the district has increased from 62,000 in 2011 to 68,397 in 2021 (a 10.3% increase against a NI average increase of 9.3%).

In September 2019 the Department for Infrastructure published a revised HGI figure of 10,000 dwellings for Newry, Mourne and Down covering a 15-year period 2016-2030.

The Council commissioned a review of its housing evidence base in 2024 and this incorporated an assessment of the 2016 based HGIs and their application to the Plan period 2020-2035. The 2024 Housing Review identified a need/requirement for an additional 9,965 dwellings between 2020 and 2035. Given that baseline HGIs are rounded to the nearest hundred, the identified requirement was rounded to 10,000 and so aligned with the HGI figure.

The review of the LDP housing evidence base recommended that a 10% flexibility allowance be applied to the identified requirement, this resulted in the overall requirement being uplifted to 11,000 (overall strategic housing need figure).

Three of the small towns have been newly uplifted from villages. Whilst these are under the 5,000 population, the intention is to support the growth of these new towns in accordance with their uplifted designation. Based on 2021 Census figures Saintfield's population stood at 3,588.

The Draft Plan Strategy acknowledges that two of the newly uplifted towns, Saintfield and Castlewellan, have a smaller level of housing supply. It is stated that further consideration will be given to their growth requirements at LPP stage.

We would question the intention to support the growth of Saintfield as a small town with a low allocation of 55 new homes, when compared with the allocations to villages within the district. In total 12 villages have a significantly higher allocation compared with Saintfield. Factoring in a 16% uplift for historic trends in relation to windfall units, 23 villages have been allocated a share of 2,032 units. This equates to an average allocation of 88 units per village, which is in stark contrast to the allocation of 55 units for the town of Saintfield.

**Table 7: HS1 Indicative Strategic Housing Land Allocation 2020-2035**

<b>Tier</b>	<b>Settlement</b>	<b>Indicative Housing Allocation</b>
<b>City/Main Town</b>	Newry Downpatrick	2,688 1,824 (2,235*)
<b>Total 38%*</b>		<b>4,512 (4,923*)</b>
<b>Local and Small Towns</b>	Newcastle Warrenpoint/Burren Kilkeel Ballynahinch Saintfield Killyleagh Castlewellan Crossmaglen	468 665 720 676 (1,103*) 55 179 44 263
<b>Total 27%*</b>		<b>3,070 (3,497*)</b>

<b>Villages</b>	Bessbrook Rostrevor Annalong Crossgar Ardglass Dundrum Hilltown Drumaness Camlough Mayobridge Killough Newtownhamilton Meigh Annsborough Ballyholland Mullaghbane Ballymartin Forkhill Strangford Jonesborough Ballykinler Cullyhanna Clough	301 119 171 123 348 7 74 87 80 39 75 65 11 41 46 12 9 57 60 53 25 40 15
<b>Total 16%*</b>		<b>2,032**</b>

The 2024 Housing Review of the Council's evidence base suggested that a non-implementation allowance be applied to the strategic housing allocation. This has resulted in an adjusted provision of between 11,373 and 12,127 dwellings between 2020 and 2035

## Newry City and Towns

### Phase 1 Sites

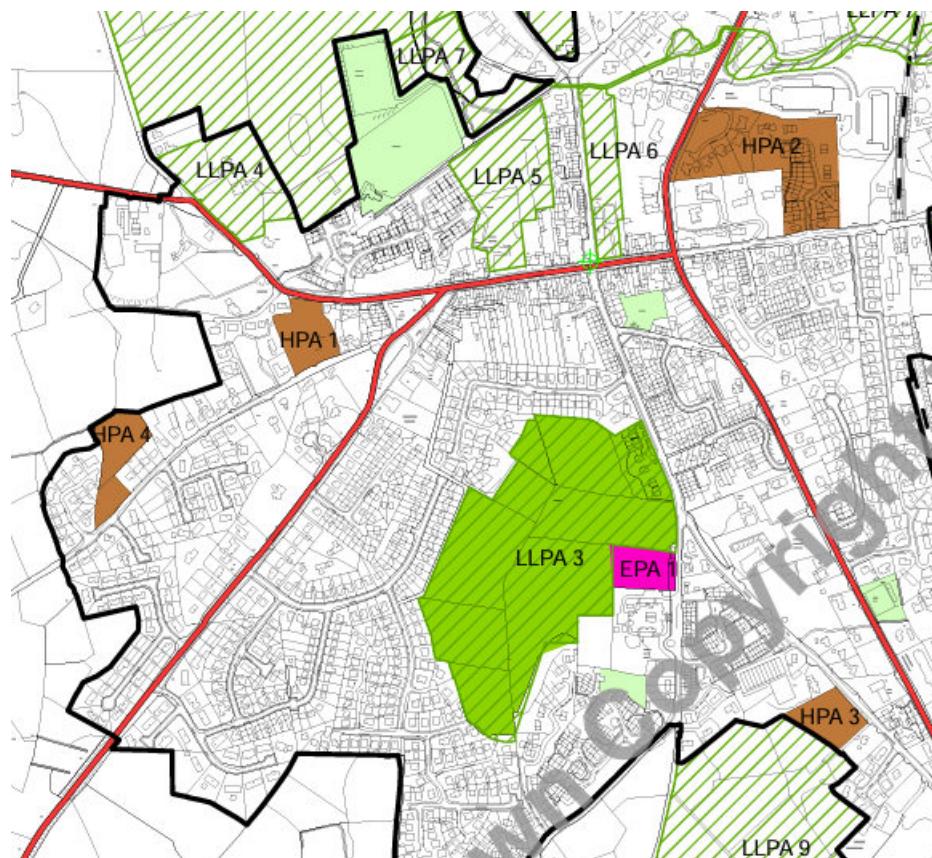
The strategic housing allocation will generally be met through Phase 1 sites which consist of committed housing sites (extant planning permission or sites which are under development), uncommitted zoned sites, urban capacity sites and the consideration of windfall potential. Where this is considered insufficient to meet the strategic housing allocation or affordable housing need, additional land may be included. The identification of this land will follow a sequential approach where land at the urban fringe is considered before expansion of the settlement limit.

A criteria-based approach to selecting sites for each phase will be undertaken. The selection criteria will take account of a number of factors including an urban capacity study, accessibility analysis, topography, flooding and any other constraints on development. Sites will be identified at LPP stage and will only be allocated where they are 0.1 hectares or above and capable of delivering 5 dwellings or more.

Local & Small Towns							
Settlements	Units Complete	Remaining Potential	Area Developed (ha)	Area Remaining (ha)	Committed Remaining Units	Zoned Uncommitted Units Remaining	
Ballynahinch	1,214	993	60.38	50.94	312	595	
Crossmaglen	273	233	12.51	9.90	118	97	
Kilkeel	923	590	45.40	33.09	162	369	
Warrenpoint/ Burren	1,919	581	106.85	30.25	158	397	
Newcastle	1,811	362	89.77	16.53	190	96	
Newtownhamilton	109	145	5.21	5.69	25	40	

Villages	Settlements	Units Complete	Remaining Potential	Area Developed (ha)	Area Remaining (ha)	Committed Remaining Units	Zoned Uncommitted Units Remaining
Annalong		373	141	19.43	6.46	47	49
Annsborough		183	150	8.37	9.35	14	0
Ardglass		300	374	13.41	18.84	324	0
Attical		27	46	2.34	2.93	23	15
Ballyholland		124	45	5.43	2.28	14	31
Ballykinler		82	22	4.53	1.08	19	0
Ballymartin		127	9	6.95	0.92	9	0
Bessbrook		269	322	14.48	6.21	28	272
Castlewellan		692	50	32.21	2.92	16	10
Camlough		191	110	10.37	6.29	36	41
Clough		68	20	3.31	0.95	13	0
Crossgar		523	130	27.01	6.83	11	105
Cullyhanna		63	52	3.60	2.87	15	21
Drumaness		281	100	12.84	6.29	15	71
Dundrum		575	24	20.66	1.27	2	0
Forkhill		107	77	5.23	4.20	11	45
Hilltown		462	56	23.82	3.71	28	12
Jonesborough		77	64	3.26	3.39	19	18
Killough		237	54	11.32	2.32	28	0
Killyleagh		607	211	27.28	10.15	88	66
Mayobridge		278	27	12.91	1.82	4	19
Meigh		215	12	10.77	0.41	11	0
Mullaghbane		127	23	8.20	1.18	0	11
Rostrevor		465	118	20.65	5.53	44	67
Saintfield		1144	94	65.49	4.68	11	32

We **disagree** with the above strategy. In order to deliver the required housing within Saintfield, we would recommend that the Council revisit the settlement limits and identify additional lands to be zoned for housing. The Conservation Area designation in Saintfield takes up a large proportion of the central area within the town, which limits the deliverability of additional housing units. There is limited space for additional housing commensurate with Saintfield's upgraded status as a town and it is deemed appropriate at this stage to allocate a greater allocation of housing units, rather than awaiting local policies stage.



Extract from Ards and Down Area Plan showing the settlement limits of Saintfield

### **Monitoring Criteria and Review Process**

There is a statutory requirement for the Council to undertake an annual monitoring report – Section 21 Planning Act (NI) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (NI) 2015.

Part 2 of the draft Plan Strategy states that in accordance with the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council's annual monitoring report will focus on the following indicators:

- a Housing land supply;
- b Number of net additional housing units built;
- c Supply of land for economic development purposes; and
- d Other issues the Council deem to be relevant to the implementation of the LDP..

We broadly support the monitoring indicators set out in the technical paper, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period.

However, projected housing figures and other relevant policies specified above should be amended as required in order to enable accurate monitoring of the plan. One of the key objectives is to protect

and sustain the role of local and small towns so they act as local centres for housing and community services. This requires a realistic provision of housing to enable Saintfield to grow as a small town and to effectively function as intended.

### **Housing Land Availability in Saintfield**



Site Ref	Address	Site Potential	Approximate Potential Yield
1	Public Park in conjunction with Saintfield Community Centre	Full planning permission granted in July 2022  (Planning Ref: LA07/2021/0394/F)	0 dwellings
2	Lands at Todd's Hill	This land has been built out for residential development and has no capacity for further development. Zoned housing land HPA 2.	0 dwellings
3	Rowallane Inn, Belfast Road	Planning permission was previously sought for redevelopment of this site and adjoining lands for residential development and permission was granted for 20 units in 2010, however, no works were commenced and there are no extant permissions pertaining to these lands. The Rowallane Inn continues to function and it is unlikely that additional housing units will be delivered at this site.	0 dwellings
4	Lands to the rear of No.49 Main Street	Permission was previously granted for 3 no. apartments in July 2010, but no works have commenced on site.	0 dwellings
5	6-10 Fairview, Saintfield	Residential development approved for 14 no. apartments for social housing	14 dwellings
6	Lands at Old Belfast Road, Saintfield	Residential development of 19no. dwellings completed on site	0 dwellings
7	Middle Road, Saintfield	Planning permission granted for a single dwelling in 2007. One dwelling exists on the site but there are no extant permissions pertaining to these lands for further development. Zoned housing land HPA 1	0 dwellings
8	Lands to rear of 43 Middle Road, Saintfield	Zoned housing land HPA 4. A maximum of 12 units were envisaged for this site, however there have been no applications submitted. Access is to be provided via the adjoining Carrigmore development. It is unlikely that development on this site will be forthcoming.	0 dwellings

<b>9</b>	Town Hill	A large parcel of land within the settlement limits but is zoned as a Local Landscape Policy Area and is earmarked for accessible public recreation and open space	0 units
<b>10</b>	Rear of 40 Queens Park Saintfield	Planning application submitted for 2 dwellings in 2017 but subsequently withdrawn	0 units
<b>11</b>	47 Crossgar Road	Planning permission granted for a single dwelling LA07/2020/0993/F	1 dwelling
<b>12</b>	21 Old Grand Jury Road	Planning permission granted for 12 residential units Dec 2009 on zoned housing land HPA 3. No development has commenced.	12 dwellings
<b>13</b>	South East of St Marys Primary School, Old Grand Jury Road	Full planning permission granted for 16 dwellings February 2024.	16 dwellings
<b>14</b>	Lands south east of 1B Rowallane Close	Planning permission granted for 2 dwellings September 2019. Development ongoing according to housing monitor and foundations visible on Google Maps.	2 dwellings

Overall, it is considered that there are limited land opportunities within the settlement limit, given that the majority of lands within Saintfield are committed, or unavailable for housing.

It is considered that even if the above sites were available, there is only a limited potential yield for residential dwellings within the settlement limit. Given that Saintfield has been redesignated as a small town it is considered that there will be a shortfall of dwellings within Saintfield within the next plan period.

Therefore, it is evident that more lands to accommodate future growth within the next plan period will be required and lands that are readily available for housing development be considered in order to aid housing delivery within the settlement.

**Proposed site for inclusion within the settlement limits of Saintfield**

We draw to your attention the attached parcel of land (please refer to Appendix 1) for inclusion within the settlement limit of Saintfield in the forthcoming Local Development Plan (LDP), which could be utilised to accommodate future growth.

The lands are approximately 2.1 hectares and are located to the south-west of Saintfield along the northern side of the Ballynahinch Road. Access to the site is available from Ballynahinch Road. The rational for the inclusion of the site is as follows;

- The northern and eastern boundaries of the site currently abuts the settlement limit of Saintfield with existing housing development located to the north and east of the subject lands;
- Inclusion of this site within the settlement limit will not result in urban sprawl as the western boundary consists of mature vegetation
- The lands are predominately flat which are suitable for future development;
- There are no physical or environmental impacts that could preclude future development of the site;
- The lands can be easily accessed from the Ballynahinch Road
- The immediate context is predominately residential in character.

On this basis, we would encourage the Council to consider our client's lands as being suitable lands for the inclusion within the new settlement limit of Saintfield. We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as preparation of the LDP progresses. We would also note that we wish to be heard orally and participate in the upcoming Newry, Mourne and Down District Council Draft Plan Strategy hearing.

Yours Sincerely,



**Gravis Planning**

**Appendix 1**  
**Suggested site for inclusion within the Saintfield Settlement Limit**



## Appendix 2

## Newry, Mourne and Down Housing Monitor Data 2024

