



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			
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)

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)

Plan Policy CF1 Community facilities

(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 representation letter and map -Our ref:

Letter 25-00058 - [REDACTED]

Map Draft Plan Strategy, Area Plan Submission, Bessbrook

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?

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:

By Email

22 September 2025

F.A.O. Local Development Plan Team -Newry Mourne & Down District Council

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Our ref: 25-00058 – [REDACTED]**Location:** Lands to the west of Avila Nursing Home, 32 Convent Hill, Bessbrook, Newry.**Re:** Draft Plan Strategy Representation letter - Plan Policy CF1 Community Facilities

On behalf of our client [REDACTED] we welcome the opportunity to comment on the Newry Mourne & Down District Council Draft Plan Strategy (DPS).

To ensure that this representation is set within the appropriate planning context, we have reviewed all legislative, regulative and policy requirements/guidance associated with preparing local development plans in Northern Ireland and all supporting documents associated with the DPS and the preferred Options Paper, which are relevant to the topics/policies which we make comment on.

In accordance with the guidance issued by both the Department for Infrastructure and the Planning Appeals Commission in relation to representations and 'soundness', it is considered that the issues raised in this response relate to the following Soundness test:

Coherence and Effectiveness Tests.

CE4 *It is reasonably flexible to enable it to deal with changing circumstances*

Policy CF1 Community Facilities.

The draft plan is not reasonably flexible to enable it to deal with the ever-changing demands on the health sector, particularly those stemming from an aging population. It is widely acknowledged that current health care and social care services are under increasing pressures. A significant challenge lies in the growing disparity between the demand for and supply of specialist nursing and residential homes, especially those equipped to manage the complex needs of individuals with dementia.

Plan Policy CF1 Community facilities, *states that planning permission may be granted for new Community facilities within settlements, unless it is clearly demonstrated that a countryside location is necessary to serve a local rural population.*

To allow flexibility over the plan period and to adequately address the evolving demands of the health sector, particularly those stemming from an aging population we contend that **Policy CF1** should be reworded as follows: *planning permission may be granted for new Community facilities within*

Sheila Curtin Dip ERM BSc (Hons) Dip TP PG Conservation Architecture

settlements, unless it is clearly demonstrated that a countryside location is necessary to serve a local population.

The word '*rural*' should be removed as it is overly prescriptive and limits the scope of any new facility to serving only the rural population. Evidence of need within the local population should be sufficient, regardless of whether that population is classified as rural or urban. The Plan needs to be flexible to cater for a needs-based approach to healthcare rather than a geographically restrictive one, allowing for greater flexibility and responsiveness to community needs over the lifetime of the plan.

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Lands to the west of Avila Nursing Home, 32 Convent Hill, Bessbrook, Newry.

This representation also takes the opportunity to submit a site-specific representation on behalf of Kilmore Care. The land is hatched in red on the accompanying OS Map, entitled "*Draft Plan Strategy, Area Plan Submission, Bessbrook*". The subject land comprises of a parcel of land to the immediate west of the existing Nursing Home at 32 Convent Hill, Bessbrook.

The subject site represents a very modest and natural expansion of the Bessbrook Settlement Limit, intended to accommodate the necessary growth of an existing healthcare facility. This expansion would integrate seamlessly with current development within the settlement boundary, including those situated to the north, east, and further west, across Ballynabee Road.

Expansion of the settlement limit at this specific location is justified by the opportunity to extend an existing healthcare facility at a location that is both sustainable and demonstrably necessary.

We trust that the suggested revisions to the draft Plan Strategy assist to make it more sound in compliance with the relevant legislation.

Yours sincerely



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- Landed owned by our client
- Current development limit
- ▨ Suggested Extension to Area Plan

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Project:	Contents		Location plan	
	Drawing no.	01	OS ref	26601NW2
	Scale	1:2500	Date	Sept 25
	McNally Morris Architects 15 Edentrillick Road Hillsborough BT26 6PG T- 0044 9268 2316 E- info@mcnallymorris.com Dominic Morris BSc (Hons), BArch RIBA MRIAI Hugh McNally BSc(Hons), DipArch RIBA			
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