



# 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

Arthur House, 41 Arthur Street, Belfast, BT1 4GB

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	RenewableNI
Your Job Title / Position	Policy Analyst
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.

RenewableNI supports the Newry, Mourne and Down Local Development Plan (LDP) 2035 Draft Plan Strategy and considers it to be overall sound. The Plan provides a clear framework through which to expand renewable energy in the jurisdiction of Newry, Mourne and Down District Council, which is necessary in achieving net zero carbon emissions. RenewableNI generally agrees that the Strategic Planning Policy Statement for Northern Ireland (SPPS) should be taken into account in the LDP and should provide the context for the operational policies laid out within it. RNI agrees that any changes made to the SPPS as a result of going through the review process should be taken into account in the LDP.

RenewableNI welcomes the fact that Strategic Policy RES1 supports the development of a range of renewable technologies whilst giving due consideration to preserving the natural and historic environment. RenewableNI supports the Council in not being overly prescriptive about which renewable technology should be implemented as this will allow for flexibility in response to evolving technologies and market conditions. RenewableNI welcomes the inclusion of energy efficiency measures in the Strategic Policy.

## 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)

Operational Policy RE1

(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.

RenewableNI supports most of the guidelines laid out in Operational Policy RE1 for renewable energy development. We welcome the fact that projects generating renewable and low carbon energy will be supported if they follow these guidelines. RenewableNI agrees that all renewable energy projects should have due regard to factors such as public safety; visual amenity; biodiversity and nature conservation; and flood risk. RenewableNI agrees that wind energy projects specifically should take into consideration the cumulative impact of wind farms; should not create any significant risk of landslide or bog burst; and should not give rise to significant harm caused by noise, shadow flicker, ice throw, or reflected light.

RenewableNI warns against applying a 10 times rotor diameter separation between turbines and any sensitive receptor. As stated in our response to the revised Strategic Planning Policy, the 10 times rotor diameter separation is overly restrictive and risks undermining future onshore wind development and the repowering of existing projects. Applying a 10 times rotor diameter separation from sensitive receptors will become more restrictive as larger and more efficient turbines become available and smaller turbines are phased out of production, restricting the development of modern wind farms. This makes the restriction an unrealistic and inappropriate policy as it will prevent the development of renewable energy.

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.

A more appropriate guideline for the separation of turbines would be to ensure turbines are sited four times tip height away from residential housing, but allow householders involved in a project to sign a waiver to allow turbines to be sited closer to their homes subject to checking compliance with applicable noise and shadow flicker guidelines. This follows the requirements of the Draft 2019 Wind Energy Development Guidelines applicable in the Republic of Ireland. Noise and shadow flicker impacts should be assessed on a case-by-case basis and conditioned where necessary.

Considering the Landscape Sensitivity Review included in the Draft Plan Strategy, RenewableNI believes it would be worthwhile adding a Wind Energy Strategy map within the Landscape Sensitivity Review, summarising areas with low, medium or high sensitivities for windfarm development and indicating maximum windfarm tip height permissible in these areas.

The LDP mentions microhydropower as a potential renewable energy technology. There are relatively few microhydropower projects in Northern Ireland and it is unlikely many new projects will be built until a new renewable energy support scheme is put in place. However, there is potential for modifications to existing projects or extensions to existing water facilities. It would be highly beneficial if planners were to accept relatively minor modifications or extensions to existing microhydropower projects.

## 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?

RenewableNI believes the Draft Plan Strategy provides clear mechanisms for implementation and monitoring. We welcome the commitment to an Annual Monitoring Report and a five-year review cycle, ensuring policies remain effective and can be adapted to future developments. In terms of renewable energy, this monitoring should ensure that policy is adapted according to evolving technologies, market conditions, and legislative changes.

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

Do you have any comments on the SA?

RenewableNI strongly supports the Sustainability Assessment (SA)’s acknowledgement that renewable energy development delivers local benefits, such as skilled jobs and energy security, while reducing carbon emissions.

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:

RenewableNI welcomes the conclusions of the Habitat Regulations Assessment and strongly agrees that renewable energy projects can proceed alongside conservation objectives when supported by careful site selection, early ecological surveys, and robust mitigation measures.

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:

RenewableNI welcomes the Draft Equality Impact Screening Report's recognition that facilitating renewable energy and low carbon technologies will benefit all members of the community and will have no negative impacts on any Section 75 group.

Section 0 | 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:

As many renewable projects will be located in rural areas, RenewableNI welcomes the acknowledgement in the Rural Needs Impact Assessments (RNIA) of the significant benefits renewable energy development can bring to rural communities, such as the ability to source energy locally and the provision of employment for local people.