



**Armagh Banbridge & Craigavon
District Council**

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

Our Ref: CORR 5458

Your Ref: LDP dPS

Date: 22 September 2025

By Email: ldp@nmandd.org

Dear Sir/Madam,

Newry, Mourne and Down District Council's Local Development Plan 2035 - draft Plan Strategy

I refer to your correspondence dated 27 June 2025, regarding the above. Armagh City, Banbridge and Craigavon Borough Council (ACBCBC) welcome the opportunity to comment on the draft Plan Strategy and would make the following comments.

Spatial Growth Strategy and Settlement Hierarchy

Settlement Hierarchy (SETT1)

Under soundness tests (C1, C3 & C4), ACBCBC notes that the draft Plan Strategy proposes to retain Glen as a small settlement. The settlement of Glen was designated in the Banbridge, Newry & Mourne Area Plan 2015 as a three-node settlement. Following the reform of local government, two nodes fell within the Newry, Mourne and Down District Council (NM&DDC) area and one node fell within the ACBCBC area. Please be advised that ACBCBC also propose to retain Glen as a small settlement within our settlement hierarchy.

Social: Accommodating People, Creating Quality Places and Improving Health and Wellbeing

Housing Strategy

With regards to soundness tests (C1, C3 & CE2) it is noted that under the Housing Strategy a 10% flexibility allowance and a non-implementation allowance has been incorporated into the total housing allocation.

Housing Land Allocation (HS1)

With regards to soundness test (C4), it is noted that 6% of the Strategic Housing Land Allocation 2020 – 2035 will be afforded to small settlements. ACBCBC would welcome clarification in relation to the number of units that are to be allocated to the two nodes of Glen located within NM&DDC area. ACBCBC would also welcome clarification if you intend to distinguish between the nodes of Glen small settlement that falls within NM&DDC and the node within ACBCBC, e.g. Glen (NM&D).

Furthermore, it is noted that NM&DDC propose to significantly reduce the draft Plan Strategy housing allocation (13%) to the countryside from the Preferred Options Paper figure (21%).

Open Space Strategy

ACBCBC welcomes the reference to greenways where the Draft Plan Strategy highlights the greenway linkage from Portadown Bann towpath to Newry and onto Omeath, Carlingford, & Dundalk. ACBCBC would support the reference to *'the importance of greenways ... in providing multiple benefits for amenity, recreation, health and wellbeing'*

Economic: Creating Jobs, Promoting Prosperity and Supporting Transport and Other Infrastructure

Economic Development Strategy

ACBCBC also welcomes the reference to the *'potential of the Belfast - Dublin Corridor (A1) and its potential to become a significant axis of development within the wider European context'*. Banbridge, one of our three hubs, along with Dromore Town are located along this key transport corridor.

Employment Land Allocation (EDS1)

Under soundness tests (C1, C3 & CE2), it is noted that the supporting evidence states that there is a need for 56.7ha employment land to 2035. It is also noted that the evidence states (Appendix 3E, para. 3.17) *'this requirement equates to between 31% and 35% of the quantum of undeveloped employment land in NMD in 2023, such that there is significantly more than sufficient land to accommodate the expected level of B Class employment growth that is expected in the authority area'*. Clarification would be welcomed as to whether the quantum of undeveloped 2023 employment land (160 ha) will be retained and if the identified need of 56.7 ha will be included in this undeveloped employment land figure.

Environmental: Protecting and Enhancing the Environment

Areas of Outstanding Natural Beauty (LA2)

Under soundness tests (C4 & CE1), ACBCBC note the policies for Areas of Outstanding Natural Beauty (AONB). Considering that the Mourne AONB traverses both council areas, it would be useful to ensure this is acknowledged in the draft Plan.

Please be advised that this is Council's draft response as it is going through the Council's ratification process and if any subsequent matters arise as a result of this process, that a further letter will issue in due course.

I trust that the comments contained in this response will be fully considered by your Council in the preparation of NM&DDC Plan Strategy.

Should you wish to discuss any of the comments made in this response, please do not hesitate to contact the ACBCBC Local Development Plan team.

Yours faithfully




Head of Planning