



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	South Armagh Business Improvement Group		
Your Job Title / Position	Chair		
Organisation / Group Address (if different to above)	Below		
Address	21 North Street, Crossmaglen, Newry		
Town	Crossmaglen	Postcode	BT359AB

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)	Draft Plan and Technical Supplement 5
<i>(and/or)</i>	
Relevant Section/Page Number	Strategic Policy HS1 Housing Land Allocation Page 83; and all of Si
<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.

Proposed number of housing units for South Armagh are insufficient, and the amount of proposed ho

See attached document

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.

See attached document

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?

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:

Position of South Armagh Business Improvement Group (SABIG)

SABIG has reviewed the Newry, Mourne and Down District Council Local Development Plan 2035, Draft Plan Strategy -June 2025 from the viewpoint of improving the economic and business environment for the South Armagh area. The following observations are based on Coherence and Effectiveness Tests – CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

Proposed number of housing units for South Armagh are insufficient, and the amount of proposed housing should be increased by 300%.

According to the Census 2021, the Slieve Gullion DEA:

- Has a population of 30,744
- Which is 16.9% of the population of Newry, Mourne and Down Council area

District Electoral Area	Count
Slieve Gullion	30,744
The Mournes	30,203
Crotlieve	28,668
Newry	27,913
Downpatrick	21,916
Slieve Croob	21,387
Rowallane	21,240
Total	182,071

According to the 2017 Mid-year Population Estimates for District Electoral Areas, the Slieve Gullion DEA was an area of:

- Highest growth (top 7)
- Has the lowest proportion of over 65s
- Has highest proportion of children (aged 0-15)

However, in the proposed Draft Plan Strategy the Slieve Gullion Electoral District has only a proposed allocation of new housing of 596 out of 10,339 or 5.7% of the total allocation.

This is a shocking underestimate of the needs of the areas and should be increased 3-fold.

No recognition of important road linkages (A29 Dundalk to Armagh via Newtownhamilton; N53)

In the Technical Supplement 5 – Transport (June 2025), there is no recognition of important road linkages in the Slieve Gullion area, these being:

- The A29/B31 Dundalk to Armagh via Newtownhamilton
- N53, Dundalk to Castleblaney with a significant section passing through South Armagh.

By not including these roads in any analysis, negates their importance and fails to recognise their importance for the local and regional economy.

The Council should undertake and consider studies to ascertain volume of traffic and importance of these routes for the local and regional economy.

Consultation with land owner and housing types

Council needs to talk to the owners of the land they plan to zone to see what their intentions for it are, and if it doesn't match up with the proposed plan, they need to look elsewhere to have enough land zoned for the new figures you have in your draft response.

Council also needs to consider older people who may own their own home but wish to downsize to a smaller future proof house and either pass their current house to the next generation or sell it on to a family that would need it.

Lack of any transport improvements in the South Armagh area

In the Technical Supplement 5 – Transport (June 2025), there are no consideration of any transport improvement in the Slieve Gullion area that represents 16.9% of the Council areas population. Improving infrastructure in the area which will encourage the possibility of more housing and commercial activity. Roads, water, sewerage are badly needed in the area if South Armagh is to move with the times and not be left behind any longer.

The Council should undertake and consider studies to identify the transport needs of the Slieve Gullion Electoral District Area.

The downgrading of Newtownhamilton from a small town to a village

The reclassified of Newtownhamilton from a small town to a village would be opposed by local business. Such a downgrading would reinforce rather than address the serious issues that the town has faced over the past number of years. The strategy states that the reclassification is based on evaluation of its service provision and population. All the services that are outlined in the Appendix A: RDS Settlement Hierarchy Classification are in place except for an “Enterprise Centre Information Office”, which the Council themselves should have in place.

Newtownhamilton should remain designated as a small town.