



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

[REDACTED]

First Name

[REDACTED]

Last Name

[REDACTED]

Address

Gravis Planning

1 Pavilions Office Park

Holywood

Email

[REDACTED]

Q3 Did you respond to the previous Preferred Options Paper?

Yes

No

Unsure

Section B | Individuals *(if different to Q2 above)*

Address

[REDACTED]

[REDACTED]

[REDACTED]

Town

Postcode

[REDACTED]

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*)

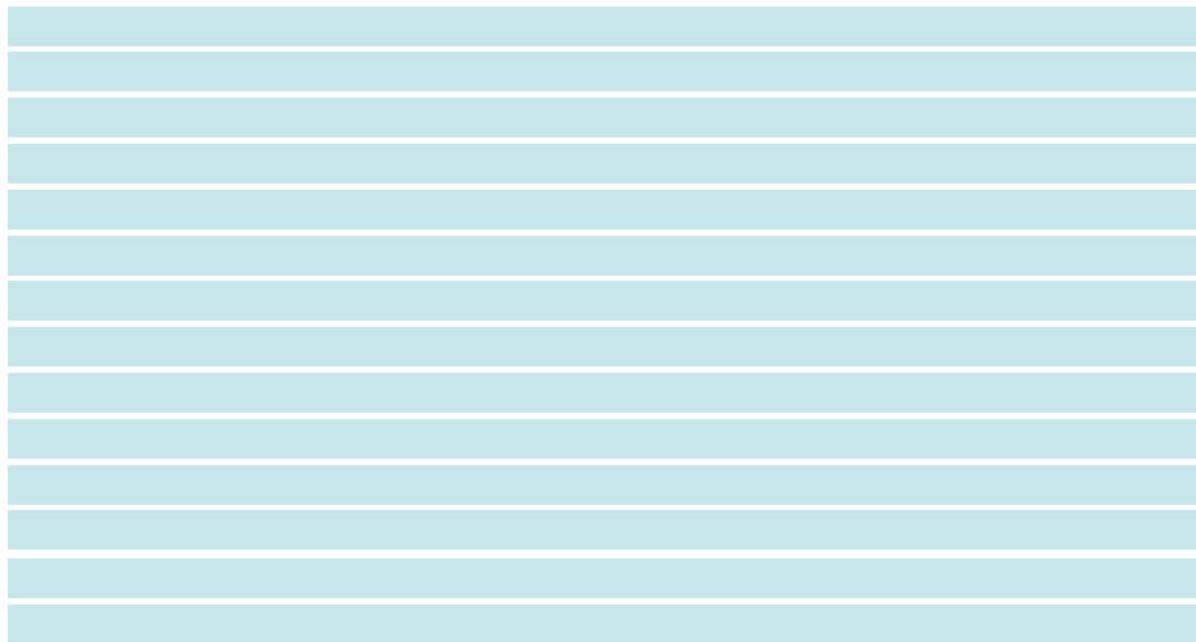
Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as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

(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 refer to the attached correspondence. There is concern that there is insufficient land to accommodate the allocated housing figures. The proximity and accessibility to Newry should allow Bessbrook to accommodate much greater numbers currently envisaged.

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.

Greater allocation to ensure that sufficient housing units are available.

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?

It is considered that a greater allocation of units should be provided for Bessbrook. A large proportion of housing (264) is subject of a pending application and if refused will leave a shortfall in the figures identified.

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 EMAIL22nd September 2025

Our Ref: C05784

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 Derrymore Road and Main Street, Bessbrook

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 27th 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).

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

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.

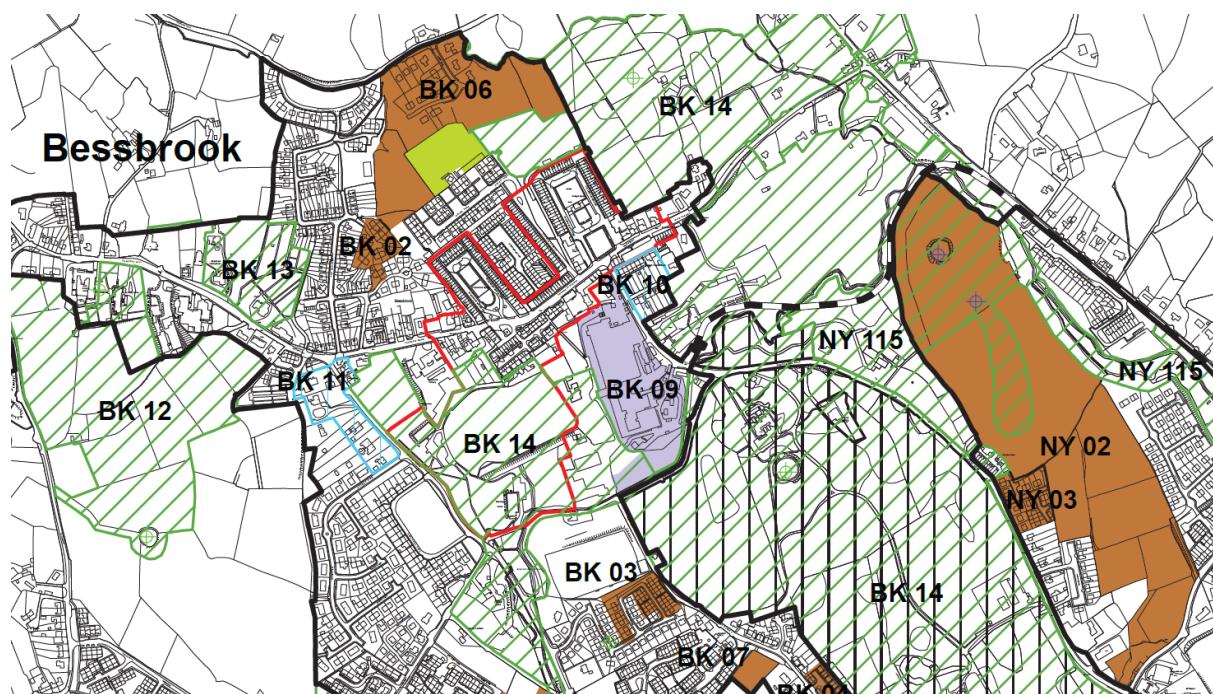
A criteria-based approach to selecting sites for each phase will be undertaken. The selection criteria will take account of a number of factors including an urban capacity study, accessibility analysis, topography, flooding and any other constraints on development. Sites will be identified at LPP stage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

Housing Policy Areas (HPAs) may be identified within villages or small settlements where they will make a key contribution to the amount of housing growth allocated to a village or small settlement. Where they are considered necessary HPAs will be identified at the LPP stage following a detailed analysis and character appraisal of the settlement and will focus on providing housing in locations where it is most likely to integrate into the character of the settlement.

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 Bessbrook, we would recommend that the Council revisit the settlement limits and identify additional lands to be zoned for housing. The Conservation Area designation in Bessbrook takes up a large proportion of the central area within the town, which limits the deliverability of additional housing units.

Whilst Bessbrook was previously considered for reclassification as a small town within the Preferred Options Paper, after further assessment of the level of resources and service provision available and its proximity to, and reliance upon, Newry City, it was determined that it should remain within Tier 3 (village). Notwithstanding the status of Bessbrook as a village, its proximity and accessibility to Newry should be further considered in terms of a greater allocation of residential units.



Extract from Banbridge, Newry and Mourne Area Plan showing the settlement limits of Bessbrook

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.

Housing Land Availability in Bessbrook

A pending application LA07/2023/2901/F makes up the main portion of the housing allocation for Bessbrook and consists of a total of 264 residential units. It is noted that there is a high volume of objections to this scheme and there is concern that if the scheme is not delivered there will be a shortfall in the LDP's ability to provide the required housing allocation.

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

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 Bessbrook

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

The lands are located between Main Street and Derrymore Road. The rational for the inclusion of the site is as follows;

- The site was previously developed as shown in the photographs below
- Proximity with greenway link with Newry
- The boundaries of the site abut the existing development limit and represent natural rounding off of the settlement boundaries
- Inclusion of this site within the settlement limit will not result in urban sprawl as the river 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 public road
- The immediate context is predominately residential in character.



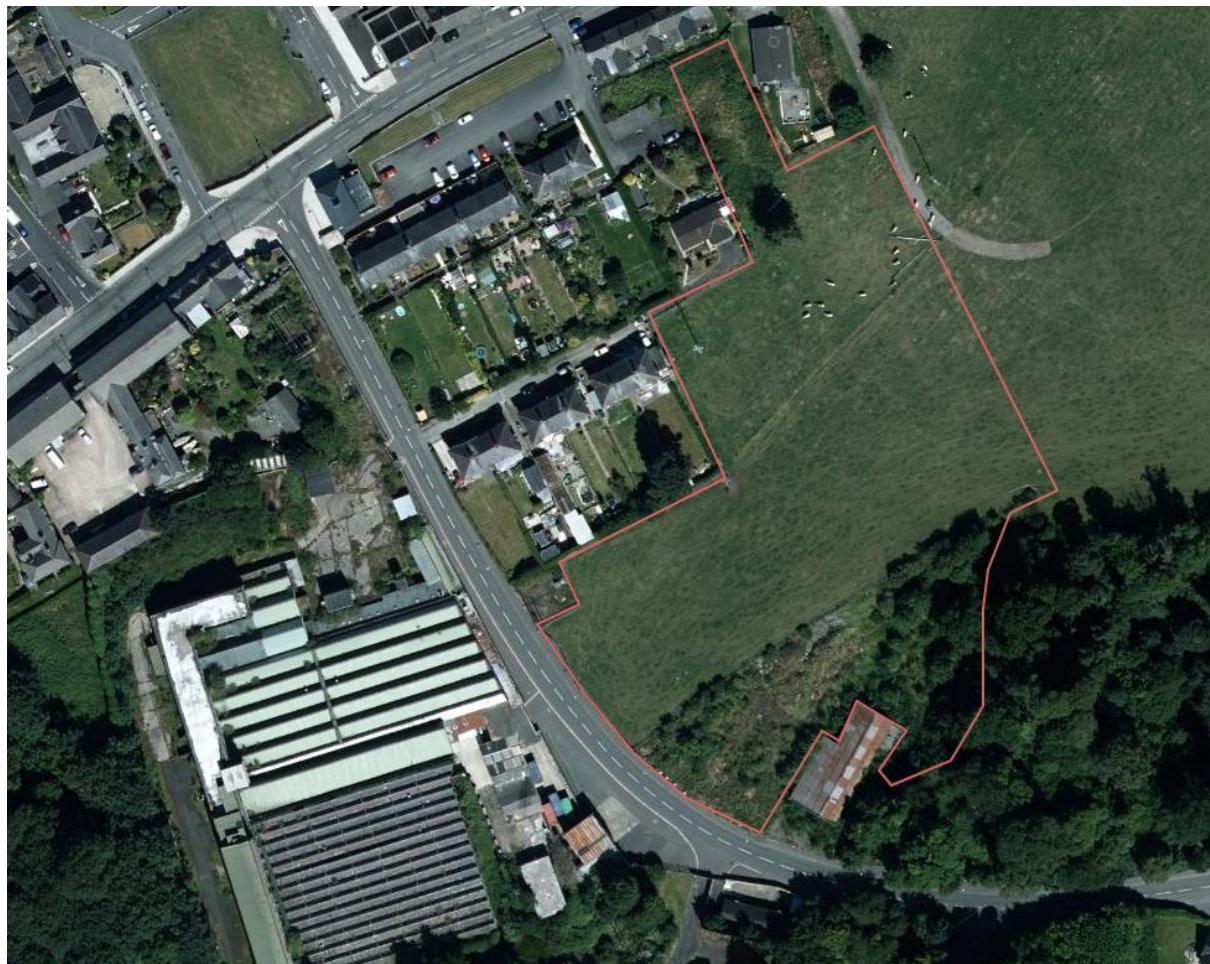
On this basis, we would encourage the Council to consider our client's lands as being suitable lands for the inclusion within the new settlement limit of Bessbrook. We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as preparation of the 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 Bessbrook Settlement Limit



Appendix 2

Newry, Mourne and Down Housing Monitor Data 2024

