
CAUTION: This email originated outside of Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi ,

Find attached as requested in below email all the documentation in pdf format.

I will send over two emails (EMAIL 1 of 2). The layout of what I am sending is for info

1. Current second representation into 2035 area plan
2. First representation into 2035 area plan
3. For info copy of PAC previous recommendation to zone land as part of 2015 area plan
4. For info copy of second representation into previous 2015 area plan (by [REDACTED] – incl in EMAIL 2 to follow)
5. For info copy of first appeal into 2015 area plan
6. For info copy of first representation into 2015 area plan.

If you require anything else just let me know.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

Mobile: [REDACTED]

[REDACTED]

From: ldp <ldp@nmandd.org>
Sent: 04 March 2026 15:40
To: [REDACTED]
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN

Good afternoon [REDACTED]

The LDP inbox has today received two notifications that emails sent from your account have been blocked, for security purposes.
As per email below, please provide any additional or supporting information to your counter-representation via pdf copy only.

With thanks,
The LDP Team

From: ldp <ldp@nmandd.org>
Sent: 03 March 2026 16:09
To: [REDACTED]
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN

Good afternoon [REDACTED]

Thank you for your email.

Please be advised that due to internal IT policies, we are unable to access links to external websites, including Dropbox.

We would be grateful if you could provide any additional or supporting information to your counter-representation via pdf copy.

With thanks,
The LDP Team

From: [REDACTED]
Sent: 27 February 2026 15:30
To: ldp <ldp@nmandd.org>
Subject: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN
Importance: High

You don't often get email from [REDACTED] [Learn why this is important](#)
CAUTION: This email originated outside of Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

Please find attached counter representation form and relevant letters in the form of a representation to the local development plan 2035. This will be the second representation (in the form of a counter representation) to this area plan the first one being in 2015.

For completeness I also provide a link to the previous representations in regards to this site, firstly to the 2035 area plan and the previous 2015 area plan dating back to September 2005.

Can you please confirm that you have lodged all of my representations.

[REDACTED]

Regards,

[REDACTED]

Mobile: [REDACTED]

[REDACTED]

This e-mail, its contents and any attachments are intended only for the above named. As this e-mail may contain confidential or legally privileged information, if you are not, or suspect that you are not, the above named, or the person responsible for delivering the message to the above named, delete or destroy the email and any attachments immediately. The contents of this e-mail may not be disclosed to, nor used by, anyone other than the above named. We will not accept any liability (in negligence or otherwise) arising from any third party acting, or refraining from acting, on such information. Opinions, conclusions and other information expressed in such messages are not given or endorsed by the Council, unless otherwise indicated in writing by an authorised representative independent of such messages. Please note that we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended. The Council undertakes monitoring of both incoming and outgoing e-mails. You should therefore be aware that if you send an e-mail to a person within the Council it may be subject to any monitoring deemed necessary by the organisation. As a public body, the Council may be required to disclose this e-mail (or any response to it) under UK Data Protection and Freedom of Information legislation, unless the information in it is covered by an exemption.

Our Ref: [REDACTED]

27th February 2026

**For the attention of Head of Planning
Development Plan Team**
Downshire Civic Centre
Downshire Estate
Ardglass Road
Downpatrick
BT30 6GQ

Dear Sir

RE: ZONING OF LAND ON NEWTOWN ROAD, CAMLOUGH FOR NEW AREA PLAN

In response to the Newry, Mourne and Down Local Development Plan draft Plan Strategy please find enclosed attached a document for potential lands to be considered for zoning within the Camlough development limits at – Newtown road, Camlough.

The key points in favour of zoning this land can be summarized as follows:

- Its location to the current development limit, and what would be seen as a natural rounding off of the SDL.
- In keeping with the spirit and purpose of the Countryside Assessment, development of this site would not constitute ribbon development or linear growth and would maintain the compactness of the settlement.

Further points discussed included:

- Through previous efforts i.e. my objection into the Draft 2015 BNMAP to have this land zoned, this is the only site in Camlough recommended for additional residential zoning by way of reports produced by the Newry and Mourne District Council and the Planning Appeals Commission (PAC) report into the final 2015 BNMAP.
- The probable future demand for zoned housing land in the forthcoming Area Plan, given current zonings CL 02 & CL 03 are long completed and inhabited and CL 05 currently under construction and selling. On completion of CL 05, this would leave no provision for housing in the next plan period 2015 onwards.

I intend to make further representation to this effect at the appropriate times in the process of the Area Plan. However I attach a summary of key site requirements (which formed part of my representation into previous area plan) for your information.

I respectfully request that this land be included within the settlement limit of Camlough.

Yours sincerely

[Redacted]

[Redacted]
[Redacted]

[Redacted]

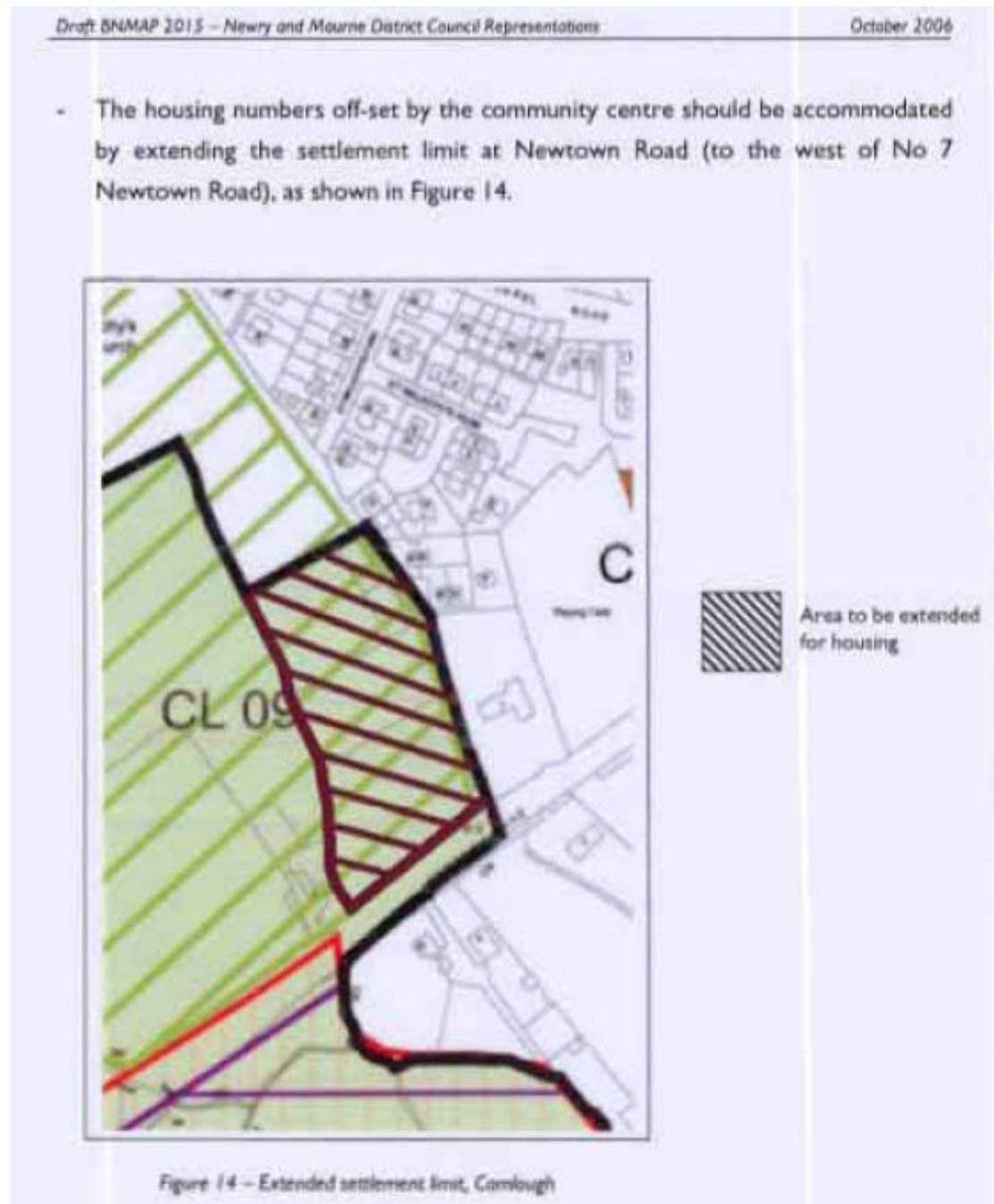
[Redacted]
Ph [Redacted]

Email: [Redacted]

Attachments:

- Camlough Map with Site highlighted
- Summary of key site requirements

Appendix 2 – Council’s recommendation to include site within Settlement Limit
BNMAP 1699



Source 5.1b, p19, BNMAP 1699 Objection

Appendix 3 – Suggested Key Site Requirements

Proposed Key Site Requirements

Zoning CL 09

Housing North of Newtown Road

1.1 hectares of land at Newtown Road are zoned for housing as identified on Map No. 3/11 – Camlough.

Key Site Requirements:

- Housing development shall be a minimum gross density of 10 dwellings per hectare and a maximum gross density of 20 dwellings per hectare;
- Access shall be gained from McCrinks Lane and this lane will be widened and upgraded under development proposals for the site;
- All existing hedgerow boundaries shall be retained and the boundary to the west of the site shall be augmented by a 3 metre belt of trees of native species to help integrate the development into the landscape.
- Footpath provision shall be provided along the Newtown Road and McCrinks Lane.
- A number of key views towards the listed St Malachy's RC Church and graveyard from Newtown Road shall be respected and retained.



303600



You may only copy this map with the permission of OSNI. See reverse for details.



Local Development Plan 2035

draft Plan Strategy

Counter Representation Form

Please complete this counter representation form 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 counter representations must be received no later than 5pm on Monday 20 April 2026.

Please complete a separate form for each counter representation.

SECTION A.

Are you responding as an individual, as an organisation or as an agent acting on behalf of an individual, group or organisation?

Please only tick one

- Individual** (Please fill in the remaining questions in section 1 (below), then proceed to Section B)
- Organisation** (Please fill in the remaining questions in section 2 (below), then proceed to Section B)
- Agent** (Please fill in the remaining questions in section 2 (below), then proceed to Section B)

1. Individual Details

Title

First Name

Last Name

Address

Telephone Number

Email Address

2. Organisation / Agent Details

Title

Name

Job Title (where relevant)

Name of organisation / company

Address

Telephone Number

Email Address

If you are representing an individual/client/company can you confirm name of individual/client/company you are responding on behalf of: _____

SECTION B.

Have you submitted a representation to the Council regarding the draft Plan Strategy?

Yes No

If yes, please provide your Reference Number NM0LOP/GEN3

Counter Representation

In accordance with Regulation 18 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 any person may make a counter representation in relation to a representation seeking a change to the draft Plan Strategy. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the draft Plan Strategy as a result of representations submitted under Regulation 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

A counter representation must not propose any further changes to the draft Plan Strategy.

Please provide the reference number of the site-specific policy representation to which your counter representation relates to.

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the Department for Infrastructure's Development Plan Practice Note 06 Soundness. Please note that your counter representation must not propose any new changes to the draft Plan Strategy.

Please note your counter representation should be submitted in full and succinctly cover all the information, evidence, and any supporting information necessary to support/justify your submission.

There will not be a subsequent opportunity to make any further submissions based on your original counter representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

see attached to this email

(If additional space is required, please continue on a separate sheet)

SECTION C.

In accordance with the Data Protection Act 2018, Newry, Mourne and Down District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should also be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure (DfI), and they will then be considered as part of the Independent Examination (IE) process.

Counter representations will be treated in accordance with the LDP privacy notice which is available to view at www.newrymournedown.org/draft-plan-strategy or is available on request by emailing ldp@nmandd.org

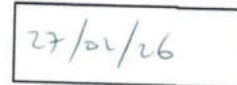
By proceeding and signing this counter representation form you confirm that you have read and understand the privacy notice above and give your consent for Newry, Mourne and Down District Council to hold your personal data for the purposes outlined.

Please note that when you make a counter representation to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website unless you request otherwise.

Signature

A rectangular box containing a solid black redaction mark, obscuring the signature.

Date

A rectangular box containing the handwritten date "27/01/26".

Liam Hannaway
Chief Executive

NMD-DPS-CR-001



Comhairle Ceantair
**an Iúir, Mhúrn
agus an Dúin**
**Newry, Mourne
and Down**
District Council

Date: 27th April 2015

Our Ref: [REDACTED]

Contact: [REDACTED]

Telephone: [REDACTED]

Dear [REDACTED]

I refer your correspondence of the 18th March 2015, as addressed to the Department of Environment (DOE), seeking to make a representation to the new local development plan for the Newry, Mourne and Down District.

I would first like to apologise for the delay in responding to your query and welcome your interest in the future development of the area.

As you should now be aware, responsibility for the majority of local planning functions formally transferred from the DOE to the new Councils on 1 April 2015. Following the establishment of Newry, Mourne and Down District Council on the 1 April 2015 Part 2 of the Planning Act (Northern Ireland) 2011 now provides for the preparation of a local development plan by the Council for its district. As part of the transitional arrangements your correspondence was transferred to the Council, as the responsible authority, hence your response from this office.

I should advise at the outset that the current statutory area plans, the Banbridge, Newry and Mourne Area Plan 2015 and Ards and Down Area Plan 2015, published by the DOE, continue to be the statutory area plans for the Newry, Mourne and Down area until such time as a new local development plan is formally adopted by the Council. The Newry, Mourne and Down Local Development Plan (NMDLDP) will, once adopted, replace the aforementioned area plans.

The preparation of the NMDLDP is at a preliminary stage and the Council is not currently in a position to consider your representation, however your submission will be retained on file for review at the appropriate stage in the plan preparation process. I can also assure you that you will be afforded the opportunity to make representations at the appropriate stages in the plan process and notification of the consultation process will be published in the local press and on the Council's web site.

Should you require any clarification in respect of the above please contact Mr Michael McQuiston on the above number.

Yours Sincerely,

[REDACTED]
[REDACTED]
Development Plan Manager

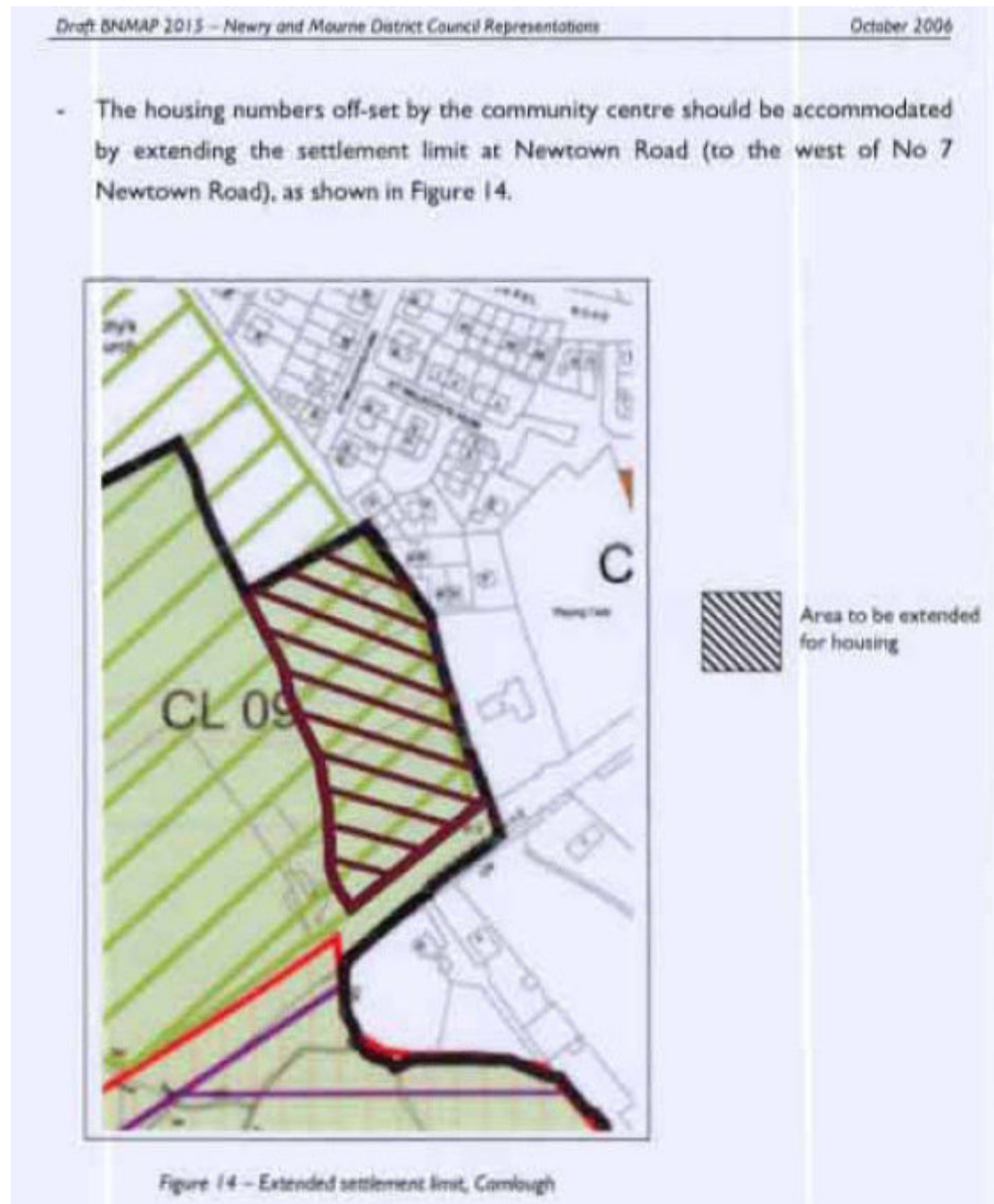
Oifig an Iúir
Newry Office
O'Hagan House
Monaghan Row
Newry BT35 8DJ

Oifig Dhún Pádraig
Downpatrick Office
Downshire Civic Centre
Downshire Estate, Ardglass Road
Downpatrick BT30 6GQ

0300 013 2233 (Council)
0300 200 7830 (Planning)
council@nmandd.org
www.newrymournedown.org

Ag freastal ar an Dún
agus Ard Mhacha Theas
Serving Down
and South Armagh

Appendix 2 – Council’s recommendation to include site within Settlement Limit
BNMAP 1699



Source 5.1b, p19, BNMAP 1699 Objection

Appendix 3 – Suggested Key Site Requirements

Proposed Key Site Requirements

Zoning CL 09

Housing North of Newtown Road

1.1 hectares of land at Newtown Road are zoned for housing as identified on Map No. 3/11 – Camlough.

Key Site Requirements:

- Housing development shall be a minimum gross density of 10 dwellings per hectare and a maximum gross density of 20 dwellings per hectare;
- Access shall be gained from McCrinks Lane and this lane will be widened and upgraded under development proposals for the site;
- All existing hedgerow boundaries shall be retained and the boundary to the west of the site shall be augmented by a 3 metre belt of trees of native species to help integrate the development into the landscape.
- Footpath provision shall be provided along the Newtown Road and McCrinks Lane.
- A number of key views towards the listed St Malachy's RC Church and graveyard from Newtown Road shall be respected and retained.

Our Ref: [REDACTED]

18th March 2015

For the attention of [REDACTED]

Downshire Civic Centre
Downshire Estate
Ardglass Road
Downpatrick
BT30 6GQ

Dear Sir

RE: PRELIMINARY REPRESENTATION REGARDING LAND ON NEWTOWN ROAD, CAMLOUGH.

An informal meeting was held in Newry & Mourne Council Offices (10.02.15) with [REDACTED]
[REDACTED] We discussed the suitability of my lands (situated on the Newtown Road, Camlough) to be brought within the development limit of Camlough in the forthcoming Area Plan, and subsequently used for housing development.

It was agreed to make a preliminary written representation to highlight the points raised as to the site's legitimate potential.

The key points in favour of zoning this land can be summarized as follows:

- Its location to the current development limit, and what would be seen as a natural rounding off of the SDL.
- In keeping with the spirit and purpose of the Countryside Assessment, development of this site would not constitute ribbon development or linear growth and would maintain the compactness of the settlement.
- There is a clear planning gain associated with development of this site in that it will enable the much needed developer-funded widening (including footpath provision) of McCrinks Lane. Despite its substandard nature (only 2.6m wide) this lane is popularly used and in need of upgrading

Further points discussed included:

- Through previous efforts i.e. my objection into the Draft 2015 BNMAP to have this land zoned, this is the only site in Camlough recommended for additional residential zoning by way of reports produced by the Newry and Mourne District Council and the Planning Appeals Commission (PAC) report into the final 2015 BNMAP.
- The probable future demand for zoned housing land in the forthcoming Area Plan, given current zonings CL 02 & CL 03 are long completed and inhabited and CL 05 currently under construction and selling. On completion of CL 05, this would leave no provision for housing in the next plan period 2015 onwards.

I intend to make further representation to this effect at the appropriate times in the process of the Area Plan. However I attach a summary of key site requirements (which formed part of my representation into previous area plan) for your information.

I respectfully request that this land be included within the settlement limit of Camlough.

Yours sincerely

[Redacted signature]

Ph [Redacted]

Email: [Redacted]

C:C

[Redacted]

Attachments:

- Camlough Map with Site highlighted
- Summary of key site requirements

The below are extracts from the PAC (Planning Appeals Commission) report on the 2015 area plan which recommended the land in question be zoned.

Cambush 64 social Houses - Total.

Planning Appeals Commission

Article 7

evidence shows a strong commitment to providing a community facility, including an all weather pitch on these lands we recommend they be zoned for this purpose.

- 3.11.18 While this would result in an awkwardly shaped SDL we are unable in the evidential context to recommend inclusion of the entire field west of CL 06, as suggested by some objections, as the Trustee's plan's do not indicate that this land is required for community facilities. The Trustee's proposals to replace the social housing "lost" from the CL 06 zoning, and for workshops on part of the CL 06, may have some merit, but it is beyond our locus to make a recommendation on these elements. Given the nature of the original objections and to avoid confusion, the designation in the Plan should clearly specify the nature of the community facilities that are acceptable. If a more comprehensive development scheme evolved would be a matter for the development management process.
- 3.11.19 Given the above conclusions, the remaining part of the CL 06 housing zoning (about 0.7 hectares) would only provide 17-25 houses instead of the original 41-58, of which at least 50 were to be social houses. Additional land would be needed to provide for the 25 social houses lost from the CL 06 zoning and Objector 1699 suggested that land north of **Newtown Road** should be allocated to meet the loss of housing on the CL 06 zoning. This land was also the subject of Objections 105 and 249. This site has a graveyard and urban development broadly to the north and east, dwellings across the road to the south and would appear as a rounding off of the urban footprint. Topography and vegetation mean that development would not be prominently seen in its setting and its inclusion would not make a significant visual difference to the village's boundary definition. The upgrading of McCrinks lane would be necessary, but this is not judged unduly problematic. We recommend that the entire site be zoned for social housing at a maximum density of 25 dwellings per hectare. This would provide for about 28 dwellings. We judge this would not have an undue impact on the areas tenure mix. Matters relating to the relationship with St Malachy's Church and its graveyard, the augmentation of existing trees and landscaping, the depth of buffer planting, detailed housing design and layout, and the extent location and provision of open space can be considered through the development management process.

Recommendations

- 3.11.20 **We recommend that:**
- **The northern element of housing zoning CL 06 and lands to the west, as shown on the attached map PAC 3, should be zoned for community facilities. KSRs should preclude other uses on the land.**
 - **The southern part of housing zoning CL 06 should remain zoned in its entirety for social housing provision and a KSR should require a minimum of 25 social housing units.**

- **The boundary of Designation CL 01 should be amended to include objection site 105/249 for housing, with KSRs requiring a maximum density of 25 dwellings per hectare and a minimum provision of 25 social housing units.**

OPEN SPACE

- 3.11.21 Objection site 1649 on the **south side of Newry Road** comprises Camlough Rovers FC's playing field, associated structures and an undeveloped area adjacent the road. The site is divorced from the proposed SDL and is not connected to it by any other objection sites. Therefore, notwithstanding existing development along Newry Road, the site's inclusion in the SDL would be illogical and contrary to the Plan aims of preventing further coalescence between Camlough and Bessbrook. The site itself is neither part of, nor strongly related to, a significant urban form and so is not comparable with St. Paul's High School and its playing fields in their physical and visual relationship with Bessbrook.
- 3.11.22 PPS 6 advises that the Department will identify major areas of existing open space on development plan maps for information purposes, and in the countryside this normally includes facilities such as regional, country and forest parks. Smaller areas of open space outside settlement boundaries, such as Carrickeruppen GAA and Camlough Rover's pitches, therefore do not fall within that definition. In any event existing open space, regardless of whether or not it is identified on plan maps, benefits from the protection of Policy OS 1 of PPS 8, unless the land is identified for an alternative use in the plan itself. No recommendation is made in relation to this objection.

AREA OF ARCHAEOLOGICAL POTENTIAL

- 3.11.23 Areas of Archaeological Potential are not designations of the draft Plan, but are identified only for information purposes and introduce no additional policy restrictions we make no comment on Objection 1650.

LOCAL LANDSCAPE POLICY AREAS

- 3.11.24 The draft Plan designates 4 LLPAs in Camlough, CL 09-12.

CL 09: Chapel Road

- 3.11.25 The designation protects St Malachy's Church and Graveyard, including their setting, views and associated landforms and vegetation, a rath and hedgerows and associated wildlife. Objection site 105 and 249 lie to the south of and between the graveyard and Newtown Road. From Newtown Road there are views across the site over a rising landform, to the elevated St Malachy's Church, set back some distance from the road. These limited and filtered views are most discernable in winter months over a relatively short stretch of the Road. They are not of particular significance in themselves or as part of the wider LLPA. While the objection sites currently comprise less intensively managed grassland, the LLPA does not relate to the land's agricultural management. Other than the boundary vegetation, the appeal site has little

The below are copies of first objection into the previous 2015 area plan to show the history.

7 pages



SQ/TD/001

26 September 2006

Banbridge/Newry & Mourne Area Plan 2015
Divisional Planning Office
Marlborough House
Central Way
Craigavon
BT64 1AD

Att: [Redacted]

Re: Objection to Banbridge/Newry & Mourne Area Plan 2015

Dear [Redacted]

Please consider this letter and the information attached as an official objection to the above mentioned Draft Area Plan. This objection concerns a site in Camlough village, Newry and its designation as a Local Landscape Policy Area.

I kindly request this site (see outlined ordinance survey map attached) be included within the zoned development area of Camlough village. The reasons for this objection are as outlined below:

- To round/square off the existing village boundary (directly across the road is included within the boundary). (see attached site plan showing outline of site and boundary).
- Site is situated within the village's 30mph road signs.

- In response to the Planning Authorities definition of Policy CVN 4 Local Landscape Policy Areas (LLPA) – see highlighted definition attached. If planning permission was ever granted in future the natural site boundary can remain intact therefore not detracting from the local environment.

- In response to the Planning Authorities definition of Designation CL09 – see highlighted definition attached. If Housing was built on-site, they would not be visible from St.Malachys Chapel if natural boundaries remained intact, i.e. not detracting from the chapels views or settings etc.

- **Previous letter** to the Planning authorities requesting the site be considered for inclusion for housing use in the next area plan dated September 2005 - see attached letter.

I hope this meets with your satisfaction, and it would be greatly appreciated if notification of the Departments decision could be made in writing to the above return address. Should you have any queries please do not hesitate to contact me.

Yours sincerely

A solid black rectangular box redacting the signature of the sender.

10 TREVOR HILL,
NEWRY, CO. DOWN
BT34 1DN

Telephone: (028) 30266011
Fax: (028) 30260904
Email: [REDACTED]

Our Ref.: 1240-CG

Your Ref.:



5th September 2005

D.O.E. Planning
Development Plan Sections
Marlborough House
Traigavon
BT64 1AD

Dear Sirs

REF: SITE AT NEWTOWN ROAD, CAMLOUGH, CO. ARMAGH - [REDACTED]

Please find attached copy of ACE map and Extract of Current Area Plan showing location of the above.

We would be obliged if the department would consider the inclusion of this site for housing use in the next Area Plan.

Yours sincerely
P O'HAGAN & ASSOCIATES LTD

[REDACTED]

Encs

cc [REDACTED]

From: [REDACTED]
To: [ldp](#)
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN
[4.tqAppendix 2 BNMAP 105-83 - Council support.pdf](#); [1.tqCamlough Cover Page BNMAP 105-83.pdf](#); [5.tqAppendix 3 BNMAP 105-83 - Suggested Key Site Requirements.pdf](#); [3.tqAppendix 1 BNMAP 105-83 - Views of St Malachy%27s Church.pdf](#); [2.tqStatement of Case BNMAP 105 - Camlough \[REDACTED\] Stage 2 _PAC Topic 83.pdf](#);
Attachments:
Sent: 19/03/2026 11:04:23

CAUTION: This email originated outside of Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

EMAIL 2 of 2,

Attached includes

1. For info copy of second representation into previous 2015 area plan (by [REDACTED])

Regards,

[REDACTED]
[REDACTED]
[REDACTED]

Mobile: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 19 March 2026 11:03
To: 'ldp' <ldp@nmandd.org>
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN

Hi ,

Find attached as requested in below email all the documentation in pdf format.

I will send over two emails (EMAIL 1 of 2). The layout of what I am sending is for info

1. Current second representation into 2035 area plan
2. First representation into 2035 area plan
3. For info copy of PAC previous recommendation to zone land as part of 2015 area plan
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5. For info copy of first appeal into 2015 area plan
6. For info copy of first representation into 2015 area plan.

If you require anything else just let me know.

Regards,

[REDACTED]
[REDACTED]
[REDACTED]

Mobile: [REDACTED]7



From: ldp <ldp@nmandd.org>
Sent: 04 March 2026 15:40
To: [REDACTED]
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN

Good afternoon [REDACTED]

The LDP inbox has today received two notifications that emails sent from your account have been blocked, for security purposes.
As per email below, please provide any additional or supporting information to your counter-representation via pdf copy only.

With thanks,
The LDP Team

From: ldp <ldp@nmandd.org>
Sent: 03 March 2026 16:09
To: [REDACTED]
Subject: RE: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN

Good afternoon [REDACTED]

Thank you for your email.
Please be advised that due to internal IT policies, we are unable to access links to external websites, including Dropbox.
We would be grateful if you could provide any additional or supporting information to your counter-representation via pdf copy.

With thanks,
The LDP Team

From: [REDACTED]
Sent: 27 February 2026 15:30
To: ldp <ldp@nmandd.org>
Subject: LOCAL DEVELOPMENT PLAN 2035 DRAFT PLAN
Importance: High

You don't often get email from [REDACTED] [Learn why this is important](#)
CAUTION: This email originated outside of Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

Please find attached counter representation form and relevant letters in the form of a representation to the local development plan 2035. This will be the second representation (in the form of a counter representation) to this area plan the first one being in 2015.

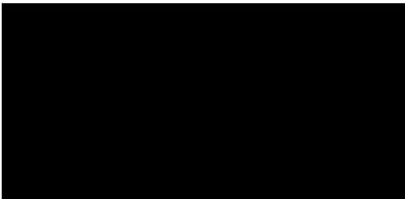
For completeness I also provide a link to the previous representations in regards to this site, firstly to the 2035 area plan and the previous 2015 area plan dating back to September 2005.

Can you please confirm that you have lodged all of my representations.

[REDACTED]

Regards,

[REDACTED]


Mobile: 

This e-mail, its contents and any attachments are intended only for the above named. As this e-mail may contain confidential or legally privileged information, if you are not, or suspect that you are not, the above named, or the person responsible for delivering the message to the above named, delete or destroy the email and any attachments immediately. The contents of this e-mail may not be disclosed to, nor used by, anyone other than the above named. We will not accept any liability (in negligence or otherwise) arising from any third party acting, or refraining from acting, on such information. Opinions, conclusions and other information expressed in such messages are not given or endorsed by the Council, unless otherwise indicated in writing by an authorised representative independent of such messages. Please note that we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended. The Council undertakes monitoring of both incoming and outgoing e-mails. You should therefore be aware that if you send an e-mail to a person within the Council it may be subject to any monitoring deemed necessary by the organisation. As a public body, the Council may be required to disclose this e-mail (or any response to it) under UK Data Protection and Freedom of Information legislation, unless the information in it is covered by an exemption.



Pac Ref: BNMAP 105/83

**Stage 2 Objection (Option C)
to
Banbridge Newry and Mourne Area Plan 2015**

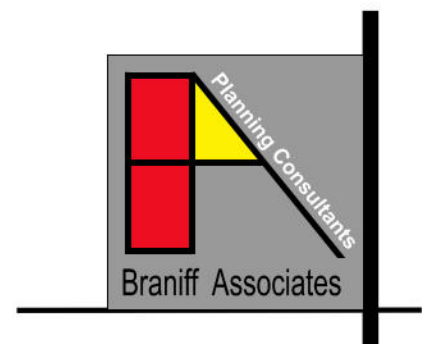
**PAC Topic 83
(Camlough Settlement Limit)**

On behalf of



WORD COUNT 1499

BRANIFF ASSOCIATES
CHARTERED TOWN PLANNERS
5 WINDSOR AVENUE NORTH
BELFAST BT9 6EL
TEL - [REDACTED]



1.0 INTRODUCTION

This submission constitutes a Stage 2 objection to the Draft BNMAP 2015 and is made on behalf of [REDACTED]

While this submission seeks to persuade the PAC and the Department to include the subject site for inclusion within the settlement limit of Camlough it also seeks to challenge its inclusion within a proposed LLPA designation. This is because there is no separate PAC topic under which to make these points.

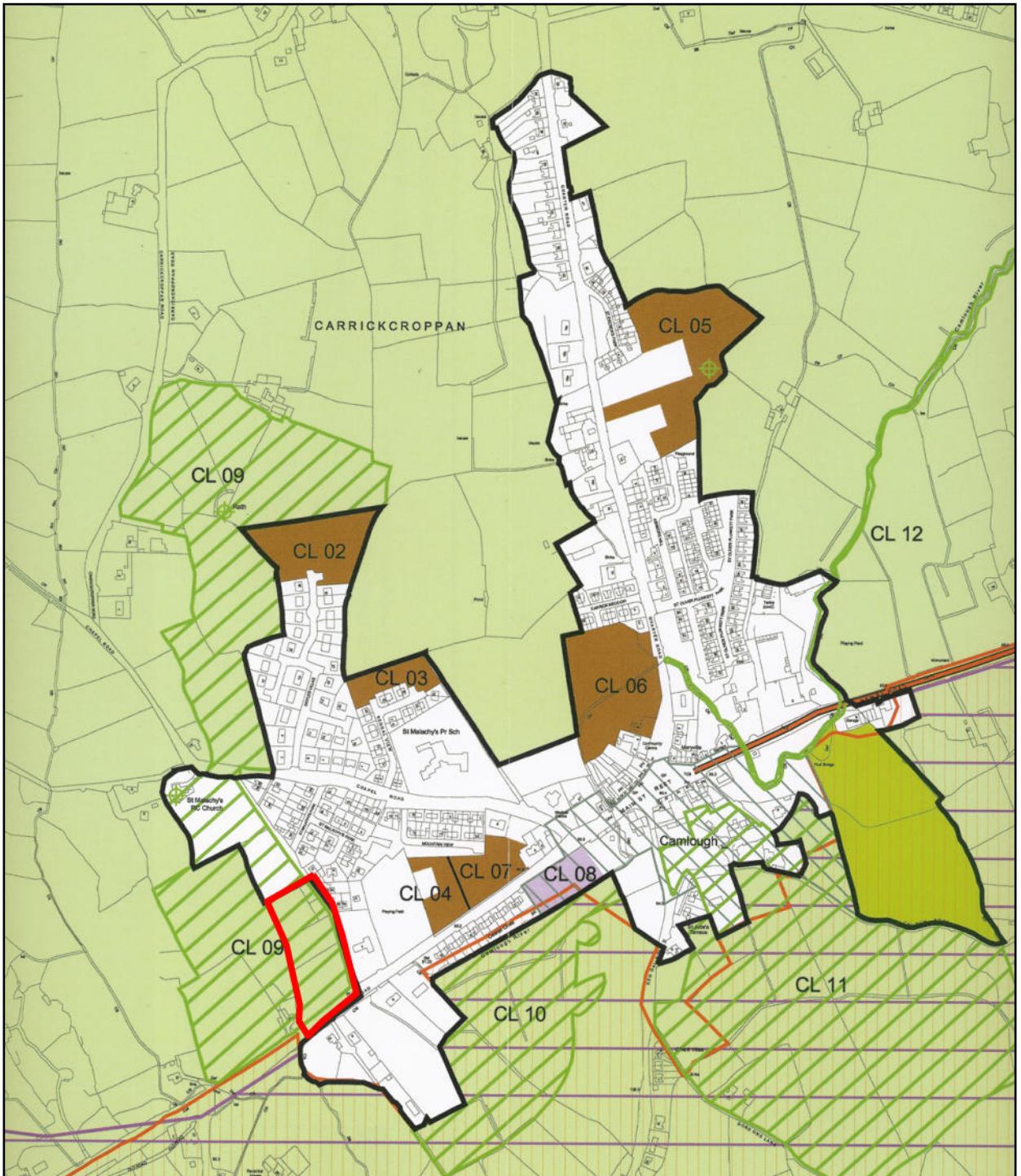
2.0 THE SITE

The site is rectangular in shape and is located on the western edge of Camlough, within the 30mph limit (see View 1 below and Map 1 overleaf).

View 1



Map 1



Comprising 1.1 hectares (2.7 acres), it is roughly 80m wide and extends approximately 150m along McCrinks Lane from its junction with Newtown Road.



The site is unsuitable for grazing and has limited agricultural value. There are a number of trees worthy of inspection for retention on the southwest boundary with No.11 and at several other locations along the site boundary. The two small fields in the northeast corner are overgrown and have the appearance of scrubland. Indeed, evidence of antisocial gatherings was observed on this part of the site.

3.0 QUESTIONABLE RATIONALE FOR LLPA DESIGNATION

While it is acknowledged that the proposed designation of a LLPA does not constitute an embargo on future development, its imposition on the objection site can only have influenced the decision by the Planning Service not to have considered it for development. Within this context, the first part of this objection disputes the appropriateness of this designation and seeks to have it removed. The Department's explanation for the designation of the LLPA is set out below.

Designation CL 09 Local Landscape Policy Area Chapel Road

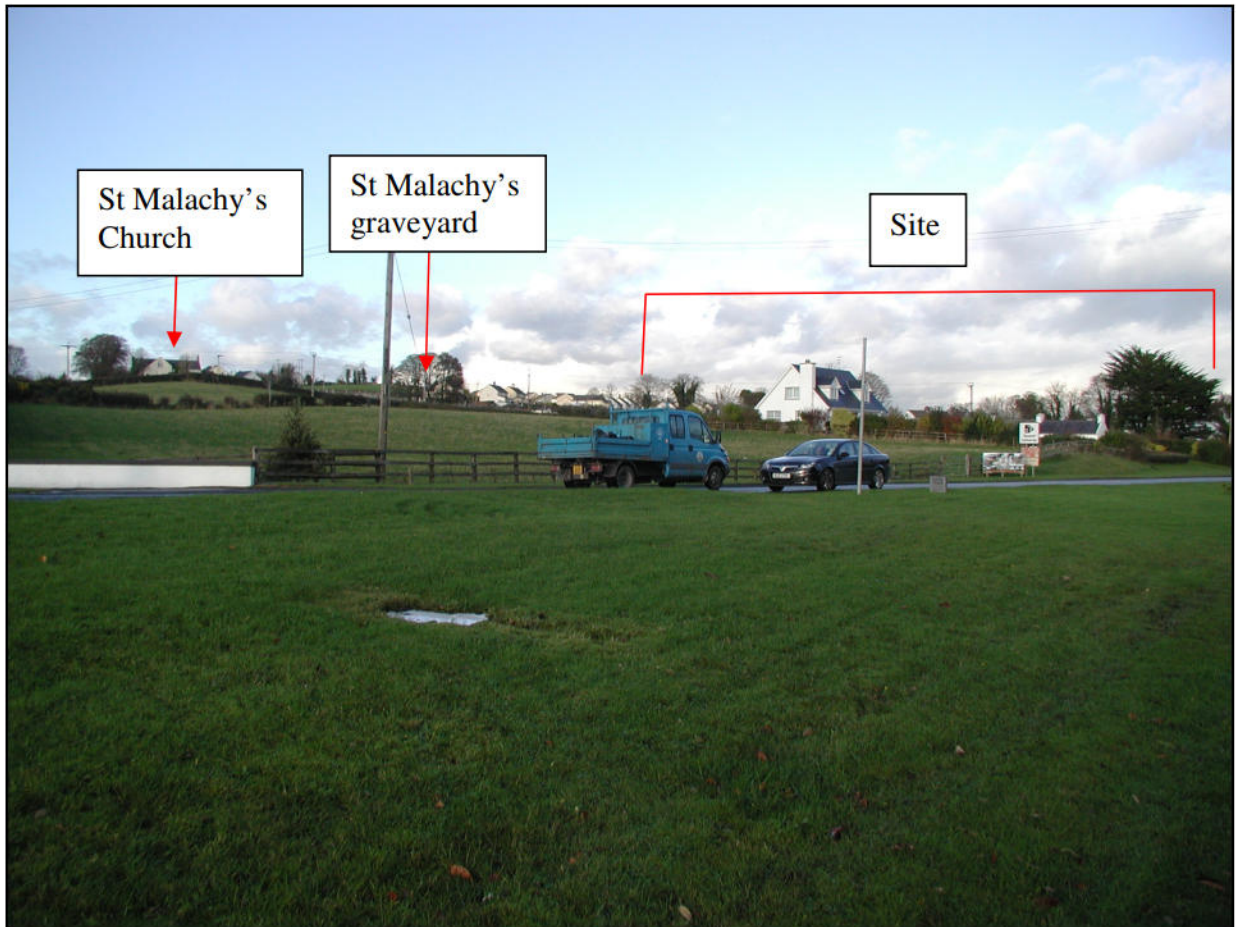
A LLPA is designated as identified on Map No. 3/11 - Camlough.

Those features or combination of features that contribute to the environmental quality, integrity or character of this LLPA are listed below:

- **St. Malachy's RC Church and graveyard including their settings, views and associated landforms and vegetation;**
- **Rath;**
- **Hedgerows and associated wildlife.**

Irrespective of the questionable extent of LLPA coverage around St Malachy's RC Church and Rath, it must be stated that views of the Church and graveyard from Newtown Road are uninterrupted and most noticeable to views from traffic and pedestrians when approaching Camlough from the west (see View 2 below).

View 2



In contrast, views from the site's frontage with Newtown Road are of the church only. Moreover, they are localized in nature and are partially occluded by intervening hedgerows (see photos 1-8 in Appendix 1).

The subject site comprises the most easterly set of fields within the proposed LLPA CL 09. Because of this, and in the light of the observations noted above, it is considered that their removal from the LLPA will not harm the intrinsic character of this environmental designation.

4.0 RESPONSE TO DEPARTMENTAL STATEMENT

Taking each of the Department's assessment factors in turn, the following points can be made in response to its assessment.

Factor 1 – Relationship to existing SDL

Importantly, the site is recognised as being contiguous with the existing Settlement Limit on three sides - its eastern, northern and (save for the intervening Newtown Road) its southern side.

Factor 2 – Site analysis

The Department favourably notes that *'the site is generally flat and not visually prominent and does not contain any other features which may constrain development.'*

Factor 3 – Urban Form and Limit Features

The scoring matrix in Appendix 8 states that *'the site lies well within the existing urban form in terms of existing and approved development and is contained by a well defined boundary'*

The well defined boundary mentioned above relates to the mature trees and hedgerows, as noted by the Department for Factor 2.

Taking this description into account and bearing in mind the basis for the scoring (see quote below) there are legitimate grounds to assert that the site should be accorded a score of 2 and not 1.

'A score of +2 will be given where a site lies well within the existing urban form in terms of existing or approved development and is contained by a well defined boundary such as a road, river or other physical feature that may clearly improve the proposed limit by bringing development to such a feature.' P34, Appendix 9, Departmental Statement

Factor 4 – Environmental designations

The LAB states that ‘*extensive development*’ of the site would impact on views and setting of St Malachy’s church. The use of the term ‘*extensive development*’ would seem to suggest that a low density, sensitively designed development could be considered here. This view is supported by the LAB’s KSR stipulation (para 4.1.7) that, as a condition of developing the land, ‘*the views towards the listed St Malachy’s RC Church and graveyard from Newtown Road shall be respected and retained.*’

View 2 in Section 3.0 indicate that the principal views of St Malachy’s Church from the Newtown Road exist on approaching Camlough from the west. Equally, View 2 also illustrates that the subject site is fairly well screened from views from this direction.

Importantly, the photos in Appendix 1 reveal that only intermittent views of the church exist from the site’s boundary with Newtown Road. Given this state of affairs, it is contended that a number of key views could be safeguarded within proposed development by careful layout and design relating to single storey development, access road orientation, location of public open space, etc.

Factor 5 – Constraints on development

Importantly, there are no recognised constraints on development.

Overall score

If another point is awarded in respect of Factor 3 above then the total score for the site should read 5 instead of 4. This would place it on a par with the highest scoring Category 2 site (BNMAP 1567b) off Quarter Road.

5.0 COUNCIL’S SUPPORT FOR INCLUSION OF OBJECTION SITE

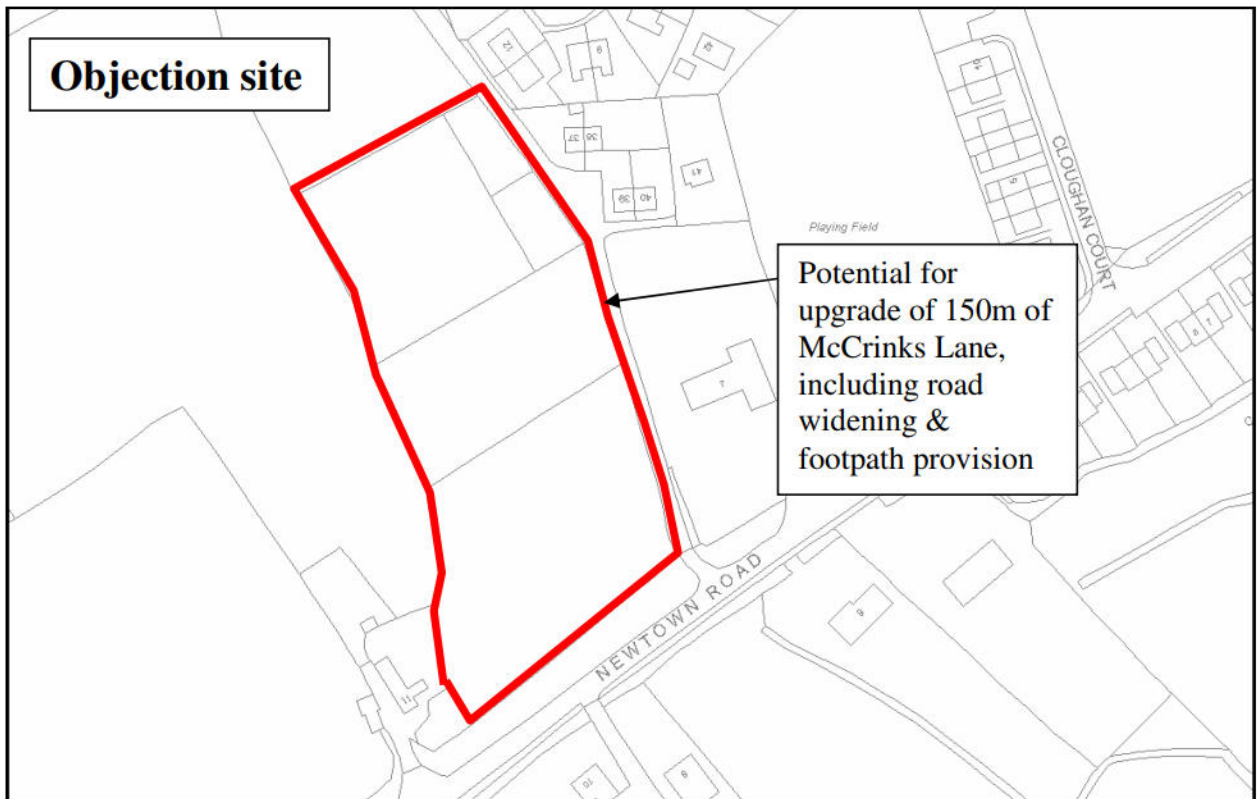
Importantly, the zoning of this land will also accord with the recommendation of Newry and Mourne District Council to include this land within the settlement limit (see Section 5.1b of Council Objection BNMAP 1699 in Appendix 2). It recommends its inclusion as a substitute for the reallocation of housing land (zoned CL 06) for community use. The suitability of the

site for development should therefore be appreciated within the context of it being the only parcel of land recommended for housing development by the Council.

6.0 PLANNING GAIN DIMENSION TO ZONING

Zoning of this land will allow for McCrinks lane to be widened (see Map 2).

Map 2



The lane is used as a shortcut to Saint Malachy's Park and Church and as a conduit to and from Newtown Road. For the most part, the lane is only 2.6m wide and passable to single file traffic only. While it is acknowledged that the permitted redevelopment of No.7 Newtown Road opposite (P/2005/0296/O) requires the widening of the lane on the opposite side, work on the objection land will allow this widening to extend for another 50m. Indeed, the widening of the lane is specifically requested by Roads Service as a Key Site Requirement (see quote below).

CAMLOUGH 105 No objections in principle subject to a satisfactory access onto McCrinks Lane. KSRs-McCrinks lane will be required to be widened. A direct footway link to the existing network will be required towards Camlough. (Appendix 6, Departmental Statement)

7.0 PROPOSED AMENDMENT TO dBNMAP

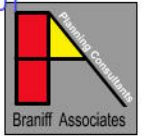
In keeping with the recommendation of the Council the whole site should be included within the settlement limit. An outline of the suggested Key Site Requirements for the development of the land is included in Appendix 3.

Natural Heritage state that if the site is zoned for housing then an 8-10 metre landscaped buffer should be developed along the boundary with Newtown Road. This is considered unnecessary as it is contended that some of the views of St Malachy's Church can be protected by careful and sensitive design.

8.0 CONCLUSION

In conclusion, the key points in favour of zoning this land can be summarised as follows: -

- In keeping with the spirit and purpose of the Countryside Assessment, development of this site would not constitute ribbon development or linear growth and would maintain the compactness of the settlement.
- This is the only site in Camlough that Newry and Mourne District Council has recommended for additional residential zoning.
- There is a clear planning gain associated with development of this site in that it will enable the much needed developer-funded widening (including footpath provision) of McCrinks Lane. Despite its substandard nature (only 2.6m wide) this lane is popularly used and in need of upgrading.



In many respects, the basis for recommending this land for inclusion within the development limit is finely balanced between two key issues. These relate to the questionable need to safeguard all the views of St Malachy's Church from the site's Newtown Road frontage on the one hand, versus the opportunity to upgrade McCrink's Lane on the other. On balance, it is asserted that the prospect of planning gain outweighs the questionable desire for a blanket protection of 'interrupted' views from the site's boundary with Newtown Road.

In the light of the facts and arguments presented in this submission, the PAC is respectfully requested to include the objection lands within the settlement limit of Camlough.

**Appendix 1 - Views of St Malachy's Church from Site's frontage with Newtown Road
(8 walkover photos from McCrink's Lane to No.11 Newtown Road)**

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



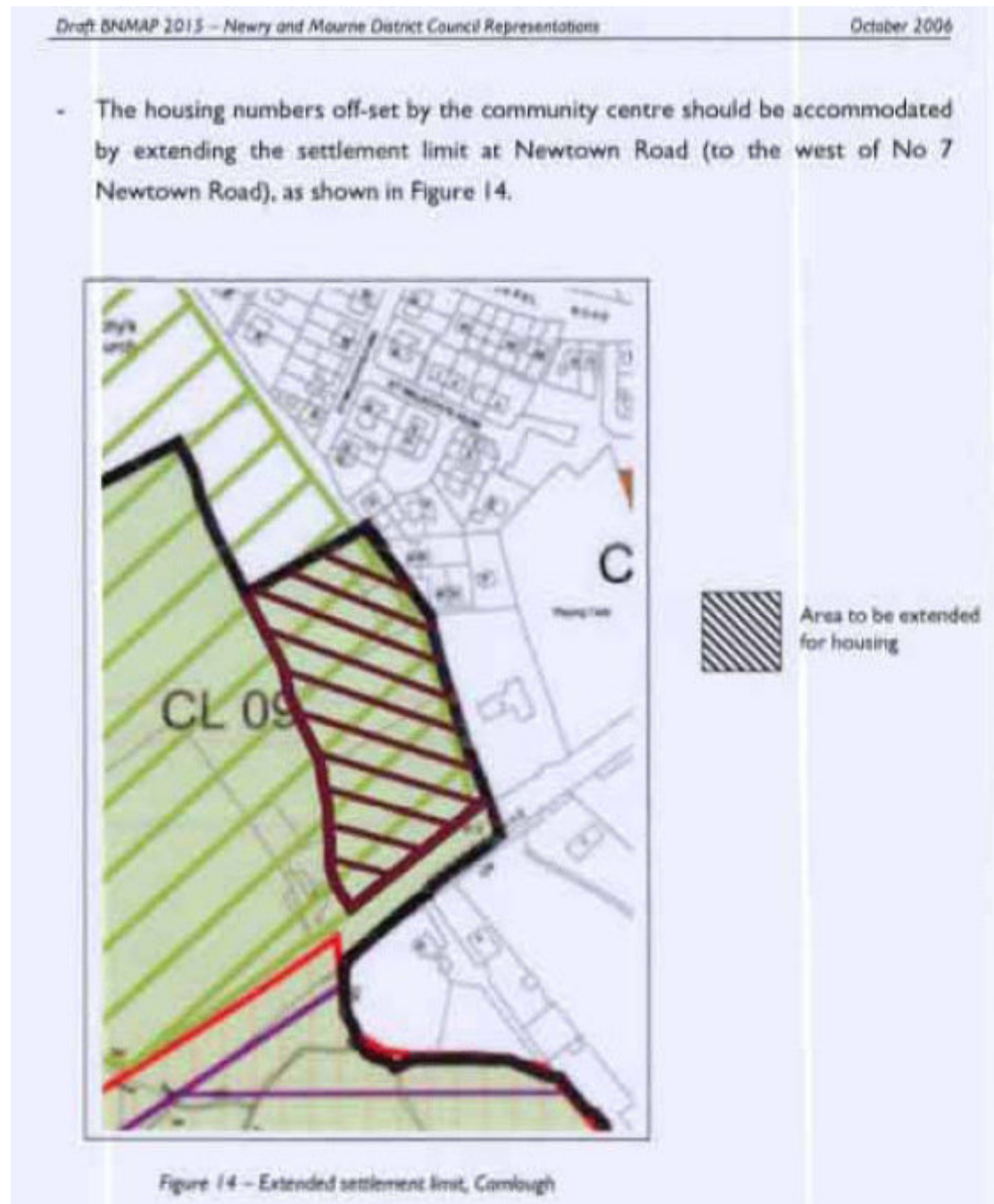
Photo 7



Photo 8



Appendix 2 – Council’s recommendation to include site within Settlement Limit
BNMAP 1699



Source 5.1b, p19, BNMAP 1699 Objection

Appendix 3 – Suggested Key Site Requirements

Proposed Key Site Requirements

Zoning CL 09

Housing North of Newtown Road

1.1 hectares of land at Newtown Road are zoned for housing as identified on Map No. 3/11 – Camlough.

Key Site Requirements:

- Housing development shall be a minimum gross density of 10 dwellings per hectare and a maximum gross density of 20 dwellings per hectare;
- Access shall be gained from McCrinks Lane and this lane will be widened and upgraded under development proposals for the site;
- All existing hedgerow boundaries shall be retained and the boundary to the west of the site shall be augmented by a 3 metre belt of trees of native species to help integrate the development into the landscape.
- Footpath provision shall be provided along the Newtown Road and McCrinks Lane.
- A number of key views towards the listed St Malachy's RC Church and graveyard from Newtown Road shall be respected and retained.