

Please find attached Representation for draft area plan.

Regards



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Representation to the Newry, Mourne and Down District Council Local Development Plan 2035 – Draft Plan Strategy

Site Reference: Rarca Winin **Settlement:** Burren

We wish to make the following representation in respect of the land identified on the map below

Background and Context

The subject site is located in the open countryside, immediately adjacent to the existing built form of Burren. However, it directly abuts the proposed settlement limit for Burren as identified in the **Draft Banbridge / Newry & Mourne Area Plan 2015**.

It is important to note that, prior to the publication of that Draft Area Plan, the Divisional Planning Office granted full planning permission for the **Rarca Willin** residential development (comprising 9 no. dwellings) on **7 June 2006** under planning reference **P/2004/1616**. The Draft Area Plan was not published by the Department until **August 2006** — approximately two months after this permission was issued.

Crucially, two of the nine approved dwellings within the Rarca Willin development (specifically **Nos. 3A and 6**) extend beyond the settlement limit subsequently proposed for Burren in the Draft Area Plan. This creates an anomalous situation whereby dwellings that were lawfully approved and constructed (or committed) prior to the publication of the Draft Area Plan now sit outside the defined settlement boundary.

Planning Inconsistency and Logical Flaw in the Draft Settlement Limit

We submit that the settlement limit for Burren, as drawn in the Draft Banbridge / Newry & Mourne Area Plan 2015, ought reasonably to have taken full account of all extant planning permissions and approved housing schemes at the time of its preparation. In particular, it should have incorporated the full boundaries of the Rarca Willin development, including Nos. 3A and 6.

The failure to do so has resulted in an illogical and inconsistent outcome: residential development approved by the Department itself (prior to the Draft Plan's publication) now lies partially outside the very settlement limit established by that Plan. This undermines the credibility and robustness of the settlement boundary and does not reflect a coherent or planned approach to development.

Given that the Department granted permission for a substantial housing scheme immediately adjacent to the subject site, and that part of that approved development already extends beyond (and therefore effectively defines) the edge of the settlement, it is clear that a recognisable **cluster of development** already exists at this location.

Compliance with Policy CTY 2a – New Dwellings in Existing Clusters

Policy **CTY 2a** of PPS 21: Sustainable Development in the Countryside (which remains a material consideration) provides a positive framework for granting planning permission for new dwellings within existing clusters, subject to meeting specific criteria. These include:

- The cluster lying outside of a farm and consisting of four or more buildings (of which at least three are dwellings);
- The cluster appearing as a visual entity in the local landscape;
- The site providing a suitable degree of enclosure and being bounded on at least two sides by other development in the cluster;
- The development rounding off and consolidating the cluster without significantly altering its character or visually intruding into the open countryside; and
- No adverse impact on residential amenity.

In this case, the existence of the approved Rarca Willin development (including the dwellings that straddle the proposed settlement limit) clearly demonstrates the presence of a cluster as envisaged by Policy CTY 2a. The subject site is well positioned to **round off and consolidate** this existing pattern of development in a logical and contained manner. It would not result in ribbon development or encroachment into the open countryside, but rather would provide a natural and defensible completion to the current built form.

Request

In light of the above, we respectfully request that the Council:

1. Recognises the planning history and the anomaly created by the timing of the Rarca Willin permission relative to the publication of the Draft Area Plan; and
2. Amends the settlement limit for Burren in the Draft Plan Strategy (or subsequent Local Policies Plan) to include the subject site, thereby incorporating it within the defined settlement boundary.

This adjustment would rectify an unintended inconsistency, promote sustainable consolidation of existing development, and align with the broader objectives of the Plan Strategy to manage growth in a plan-led and coherent manner while supporting rural communities.

We would welcome the opportunity to discuss this representation further and are happy to provide additional supporting information, including plans or site photographs, if required.

Submitted by: [REDACTED] **On behalf of:** [REDACTED]

Date: 14th March 2026



