

Dear LDP Team,

On behalf of [REDACTED] please find attached our counter representation, in response to Draft Plan Strategy Representations, Publication of Representations and Counter-Representation Period, in relation to the consultation period for any counter representations that is to be made commencing on Friday 30 January 2026 and ends at 5pm on Monday 20 April 2026.

Please accept this Counter representation in response to the above consultation period and I would kindly request that all future representations, including IE representation are to be made to the Council and PAC by written submission.

Best regards,

[REDACTED]

[REDACTED]

**Rapport ARCHITECTS**

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[REDACTED]

[www.rapportarchitects.com](http://www.rapportarchitects.com)

**By e-mail**

Local Development Team  
**Newry, Mourne and Down District Council**  
Downshire Civic Centre  
Downshire Estate, Ardglass Road  
Downpatrick  
BT30 6GQ

Dear LDP Team,

20<sup>th</sup> April 2026**RE: Lisburn Road, Saintfield, BT24 7AN**

File Ref: [REDACTED] 2

I write to you on behalf of [REDACTED] in response to *Draft Plan Strategy Representations, Publication of Representations and Counter-Representation Period*, in relation to the consultation period for any counter representations that is to be made commencing on Friday 30 January 2026 and ends at **5pm on Monday 20 April 2026**.

In accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, notice is hereby given that Newry, Mourne and Down District Council is publishing the representations received during the statutory public consultation period for its Local Development Plan 2035 – Draft Plan Strategy.

Please accept this Counter representation in response to the above consultation period and I would kindly request that all future representations, including IE representation are to be made to the Council and PAC by written submission.

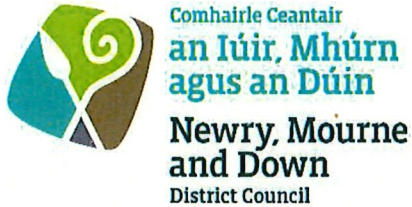
Yours sincerely,

A large black rectangular redaction box covering the signature of the sender.

A small black rectangular redaction box covering the name of the sender.

A small black rectangular redaction box covering the name of the sender, followed by the text "Rapport Architects".

Cc. Separate Representation  
Completed Counter Representation Form



## Local Development Plan 2035

### draft Plan Strategy

### Counter Representation Form

Please complete this counter representation form and email to [ldp@nmandd.org](mailto: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 <sup>NA</sup>

**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

*(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](http://www.newrymournedown.org/draft-plan-strategy) or is available on request by emailing [ldp@nmandd.org](mailto: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

Date



**Submission to  
Newry, Mourne and Down District Council**

**Counter Representation  
on behalf of**



**20<sup>th</sup> April 2026**

**BY EMAIL**

19<sup>th</sup> April 2026

Our REF: [REDACTED]s

Planning LDP Team  
Newry Mourne and Down District Council  
Downshire Civic Centre  
Downshire Estate  
Ardglass Road  
Downpatrick  
BT30 6 GQ

Dear LDP Team,

I write to you on behalf of [REDACTED] in response to *Draft Plan Strategy Representations, Publication of Representations and Counter-Representation Period*, in relation to the consultation period for any counter representations that is to be made commencing on Friday 30 January 2026 and ends at **5pm on Monday 20 April 2026**.

*In accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, notice is hereby given that Newry, Mourne and Down District Council is publishing the representations received during the statutory public consultation period for its Local Development Plan 2035 – Draft Plan Strategy.*

Please accept this Counter representation in response to the above consultation period and I would kindly request that all future representations, including IE representation are to be made to the Council and PAC by written submission.

In response to the Council's draft Plan Strategy June 2025, this Counter representations does not propose any changes to the development plan document but seeks to respond to soundness as set out in Development Plan Document Note 6, relating to Spatial Growth Strategy and Strategic Housing Polices below;

- SGS1
- SETT1
- HS1
- HS3

**Comments on the Spatial Growth Strategy and Strategic Polices of draft Plan Strategy**

1. We consider the Council's applied approach to meet procedural requirements. The hierarchy has evolved from the POP, has been consulted upon, and has been subject to Sustainability Appraisal. We consider statutory processes to have been followed.
2. The Plan Strategy states that it should seek to demonstrate that its spatial framework is informed by robust demographic evidence and that it can accommodate projected growth in a manner that is sustainable, deliverable, and aligned with the capacity of infrastructure, services, and settlements.
3. The Plan Strategy states that the settlement hierarchy has taken account of the Regional Development Strategy (RDS), the Strategic Planning Policy Statement (SPPS), and existing regional planning policy. It also notes regard to adopted development plans and emerging Local Development Plans in adjacent councils.
4. Our review of mythology and technical data, when read collectively with these statements the plan would appear to be sound in that they meet the procedural requirements however collectively we consider the draft plan not to demonstrate functional consistency, not merely acknowledgement of regional policy. Specifically, it is not evident how the RDS spatial objectives such as concentrating growth are operationalised through suggested settlement hierarchy or allocation of housing.
5. The settlement hierarchy is intended to provide the primary spatial framework through which housing growth is directed and managed across the District. In this respect, the effectiveness of the hierarchy is closely linked to how housing provision is distributed between settlement categories and whether that distribution enables settlements to fulfil their intended role and function.
6. The settlement hierarchy is intended to provide the spatial framework for the LDP's growth strategy. While the hierarchy categories are clearly defined it would not appear that growth expectations and policy regard to housing allocation are consistently aligned.
7. The Council's Vision provides a broad and balanced articulation of its long-term aspirations for the District. We consider it to place emphasis on community wellbeing, equality of opportunity, and the creation of high-quality places, while also recognising the importance of environmental protection and cultural heritage.
8. From a strategic perspective, the Council's Vision establishes a coherent overarching framework which, in principle, is capable of guiding plan-making and decision-taking over the plan period. However, we consider the extent to which it is effectively understood will depend on how consistently and transparently it is reflected in the Plan Strategy policies and spatial proposals.
9. The draft Plan Strategy identifies a series of strategic objectives intended to deliver the Vision across spatial, economic, social, and environmental themes. At a conceptual level, these objectives broadly align with the stated vision and address key planning

considerations such as accommodating population growth, creating quality places, and supporting health and wellbeing.

10. The objective of sustaining the role and function of local and small towns as centres for housing, services, and community facilities reflects established principles of sustainable development and settlement hierarchy planning.
11. However, we note that while the objectives set out an appropriate direction of travel at a high level, we raise soundness concerns regarding how certain objectives particularly those relating to housing provision and its allocation are operationalised through the Plan Strategy.
12. On review of the draft Plan Strategy and supporting technical reports, it would appear that the District has experienced consistent population growth over successive Census periods, with population projections indicating continued growth across the plan period. This demographic trajectory presents clear strategic implications for the Local Development Plan, particularly in relation to the scale and spatial distribution of development required to meet future housing needs.
13. This gives rise to potential issues as to whether the objectives, as implemented, are fully consistent with the Vision and whether they will effectively deliver balanced growth across the District therefore the application of soundness test should consider the relevant strategic policies, rather than at the level of the Council's objectives alone.
14. Household growth data published by the Northern Ireland Statistics and Research Agency demonstrates that the District has experienced above-average household growth between 2011 and 2021. This trend provides a clear quantitative justification for a substantive level of housing provision within the Local Development Plan and supports the principle that the Plan Strategy must be capable of accommodating sustained demand across the plan period.
15. The revised Housing Growth Indicator (HGI) of 10,000 dwellings for the period 2016–2030 provides the regional baseline against which the Council's housing evidence must be assessed. The subsequent 2024 review of the housing evidence base represents an appropriate exercise to align this indicator with the Plan Strategy period of 2020–2035. The identification of a requirement for 9,965 dwellings, rounded to 10,000 in accordance with HGI methodology, appears methodologically sound and consistent with regional practice adopted by other Council's.
16. The application of a 10% flexibility allowance, we consider to be sound, resulting in an overall strategic housing requirement of 11,000 dwellings, reflects established planning guidance aimed at addressing uncertainties in delivery, market responsiveness, and non-completion rates. At an accumulative level, the overall quantum of housing provision can therefore be regarded as broadly justified and supported by the available evidence.
17. Policy HS3 establishes a plan-led framework for managing housing supply and includes positive elements, particularly in its recognition of the importance of monitoring housing

delivery across the plan period. However, we consider, as drafted, the policy to raises soundness concerns in respect of consistency with the SPPS and the tests of coherence, realism, effective implementation, and flexibility.

18. The policy relies heavily on monitoring and review mechanisms, including the annual monitoring report, as the primary means of addressing housing delivery issues. While we acknowledge monitoring to be an essential component of plan management, it is not, in itself, a mechanism for resolving under-delivery where this arises from constraints. In such circumstances, monitoring may identify shortfalls without providing a clear or timely route to addressing the underlying cause.
19. We consider the absence of clearly defined delivery triggers, land release mechanisms, or criteria for responding to changing market conditions, infrastructure capacity, or environmental considerations limits the policy's flexibility and raises concerns regarding its practical effectiveness over the plan period.
20. We consider that Policy HS3 does not clearly demonstrate how an adequate and continuous supply of housing land would be maintained in accordance with SPPS requirements on availability and deliverability, particularly where strategic allocations prove insufficient.
21. This lack of clarity is particularly relevant where spatial outcomes appear to diverge from settlement status, stated strategic objectives, or regional policy aspirations. In the absence of clearer evidence that sustainability considerations were embedded at key decision points, concerns arise in relation to the soundness tests of justification and coherence.
22. In summary, while the overall approach to housing management and sustainability appraisal reflects appropriate planning principles, the Draft Plan Strategy does not yet demonstrate, with sufficient clarity, that Policy HS3 and the associated spatial decisions are fully justified, coherent, flexible, and capable of effective implementation at the point of adoption.
23. The draft Plan Strategy proposes the reclassification of three settlements from village to small town status to include Saintfield, notwithstanding populations remaining below 5,000. We welcome Saintfield's inclusion and being recognised as a small town providing a range of retail services, leisure and community facilities within policy SETT1.
24. Additionally, we welcome the plans' sequential approach to be applied to Saintfield regarding growth requirements at the Local Policies Plan stage and consider this approach to be reasonable and sound as a fallback position to meet housing demand.
25. However, this reflects a strategic intention to support Saintfield's growth and role within the wider settlement network of the District. In principle, such an uplift in status implies an expectation of a commensurate increase in development opportunity, particularly in relation to housing provision and service function. In this context, we consider the housing

allocation for Saintfield merits closer scrutiny at this time and should not be deferred to the Local Policies Plan.

26. While now designated as a town, Saintfield is allocated a comparatively low level of housing growth within the Plan Strategy yet on the ground and consideration of supporting growth strategy for the District and town status this low figure is not reflective and on the evidence base brought forward by the Council we consider there to be scope to deliver a greater uplift than suggested allocation for Saintfield.
27. As previously stated, the plan highlights Saintfield to offer a limited housing supply at this stage and defers further consideration of growth requirements to the Local Policies Plan. This phased approach introduces uncertainty as to whether the strategic role of these towns is being fully embedded at the Plan Strategy stage and raises soundness concerns.
28. A comparative assessment indicates that a significant number of villages have been allocated higher levels of housing growth than Saintfield. When adjustments are made to reflect historic windfall trends, villages across the district receive an average allocation that materially exceeds that of a newly designated town. This disparity raises questions regarding the internal consistency of the draft Plan Strategy and whether housing distribution adequately reflects uplifted settlement status and intended function.
29. When considered in relation to Settlement Hierarchy and Strategic Settlement Evaluation document the assessment of Saintfield against recognised resource, capacity and function tests indicates that the settlement demonstrates characteristics more consistent with a Tier 2 (Small Town) classification rather than Tier 3 (Village) this should therefore correlate with the plan's projected housing allocation and polices and not detract from.
30. In terms of resource capacity, Saintfield contains a range of established community assets and services that function beyond village scale. While further technical confirmation of infrastructure capacity would be required, there is no clear evidence within supporting technical documents to constrain limiting growth to that brought forward at this stage.
31. Saintfield's would appear to offer the potential for outward growth through carefully selected, sequential planned sites without significant environmental harm or rural erosion.
32. From a transport perspective, Saintfield benefits from an accessible and compact form that supports walking, cycling and public transport use, consistent with sustainable small-town development principles.
33. In relation to economic function, Saintfield serves a wider hinterland, supporting local employment, retail and services. Restricting housing growth risks undermining its ability to sustain these roles.
34. Saintfield's urban character and sense of place could be retained through controlled and logical expansion adjacent to the existing settlement limit and existing housing

land/committed approved housing. Housing growth would help reinforce its community and social service function over the plan period.

35. Overall, on review of technical evidence documents of the draft Plan Strategy, we consider Saintfield to offer a functional role, service base and growth potential expected of a small town. A constrained housing provision risks limiting its ability to perform this role effectively, which raises issues of coherence and effectiveness within the settlement hierarchy.
36. Council's approach is not sound and risks undermining the clarity and credibility of the settlement hierarchy. If towns are allocated less housing growth than villages, the distinction between settlement categories becomes less meaningful in practical terms. Moreover, reliance on future consideration at Local Policies Plan stage may weaken the strategic certainty that the Plan Strategy is expected to provide, particularly in relation to the delivery of its stated vision and objectives for Saintfield.
37. Overall, while the housing evidence base underpinning the total housing requirement appears robust, the translation of that requirement into spatial allocations raises issues of coherence, effectiveness, and consistency and therefore for the reasons set out above are not considered to be fully sound.
38. Whilst the Sustainability Appraisal (SA) is referenced as supporting the hierarchy, it is not clear whether the SA materially influenced decision-making or merely tested a preferred outcome the Plan Strategy. Therefore, we would welcome greater transparency as to how allocations have been concluded to warrant such restriction and policy that would appear to undermine the vision and objectives of the SPPS.
39. We consider emphasis on future review mechanisms to indicate unsoundness as this highlights some strategic decisions remain unresolved, which would appear to weaken the internal logic of the Plan Strategy and soundness of 'Settlement Hierarchy and Housing Allocation' especially when need for expansion to towns such as Saintfield have been expressed and are necessary in the overall housing allocation of the District.
40. The effectiveness of the allocation may be constrained where settlement classifications are not matched by commensurate development opportunity, growth of newly designated settlements is deferred rather than embedded at this stage and the hierarchy relies on later review stages to resolve foreseeable issues and an opportunity for flexibility to be applied in the intervening period facilitating settlement specifics and new opportunities aligned with the overarching growth strategy not policy hinderance thereof.
41. We consider this to raise soundness concerns, whilst we consider the settlement hierarchy to broadly meet procedural and evidential requirements, we consider unsoundness in justification, coherence, and effectiveness particularly consider the linkage between evidence and settlement outcomes in relation to village uptake to be greater than that of Saintfield recognised as a Town, is not coherent.

42. Cumulatively these issues would appear do pose threat to the Plan Strategy soundness when assessing whether the settlement hierarchy provides a sufficiently clear, justified, and effective spatial framework in line with regional strategy.
43. The draft Plan Strategy identifies a hierarchy that includes cities, towns, small towns, villages, and the countryside, with an explicit strategic objective to protect and sustain the role of local and small towns as centres for housing and community services.
44. We consider this objective to establish a reasonable expectation that settlements designated as towns or small towns will be allocated a level of housing growth that supports population retention, service provision, and economic vitality.
45. From an effectiveness perspective, we would highlight whether the settlement hierarchy is functioning as a meaningful spatial tool or whether it is largely nominal. If housing growth is not distributed in a manner that reflects intended settlement roles, the hierarchy risks losing its policy significance and undermining the spatial strategy it is intended to support.
46. While the capacity for refinement at Local Policies Plan stage is a recognised feature of the plan-making process, reliance on future consideration introduces uncertainty into the Plan Strategy as previously stated. The spatial role of settlements and their capacity for growth are strategic matters that the Plan Strategy is expected to resolve, rather than defer.
47. This approach also has implications for monitoring and plan management. The Annual Monitoring Report is proposed as a key mechanism for assessing housing delivery and land supply. However, where settlements are constrained by low housing allocations at Plan Strategy stage, monitoring may identify under-performance without the Plan providing a clear or timely mechanism for addressing the underlying cause. In such circumstances, monitoring alone cannot compensate for limitations in the strategic allocation of housing.
48. Furthermore, uneven housing provision across the hierarchy may have wider impacts, including pressure on settlements not intended to accommodate higher levels of growth, increased commuting patterns, and challenges in sustaining services within designated towns. These outcomes would be at odds with the stated objective of strengthening local centres and promoting sustainable patterns of development previously identified as indicated in housing monitor and Census data.
49. Therefore we consider the draft Plan Strategy, to be at odds with settlement hierarchy, monitoring and allocation, in that where towns are unable to grow in line with their designation, and villages are allocated proportionately greater growth, there is a risk that the hierarchy does not effectively guide development decisions over the plan period and restricts delivery of the plan.
50. The settlement hierarchy and housing distribution raise interrelated issues of coherence and effectiveness. While the hierarchy is clearly articulated in categorisation terms, its practical application through housing provision is less consistent. The relative under-provision of housing in certain designated small towns, when compared with villages, raises further concerns of soundness that the Plan Strategy is fully equipped to

deliver its stated spatial and social objectives or that it provides a clear and credible spatial framework to enables settlements to perform their intended role and support expected growth, therefore unsound. We highlight that the plan should be effective at the point of adoption, rather than dependent on future corrective stages.

51. Land availability within the settlement limit of Saintfield indicates that opportunities for additional housing development are limited. The majority of land within the defined settlement boundary is either already committed through existing permissions, constrained by non-residential uses, or otherwise unavailable or unsuitable for residential development. As a result, the capacity for further housing delivery from uncommitted land within the existing settlement limit appears constrained.
52. Even where individual sites could theoretically become available, the potential residential yield within the current settlement limit would be modest. Taken cumulatively, this limited capacity suggests that the existing land supply is unlikely to deliver a level of housing commensurate with Saintfield's designation and anticipated growth role this would indicate a need for further development opportunities to satisfy demand and meet anticipated need of housing across the district.
53. Given Saintfield's redesignation as a small town within the settlement hierarchy, a higher level of growth would ordinarily be expected in order to support its function as a local centre for housing and community services. On the basis of current land availability and potential yields, there is a risk that a shortfall in housing provision will emerge over the remainder of the plan period if reliance is placed solely on land within the existing settlement limit.
54. From a strategic perspective, this raises questions about the effectiveness of the Plan Strategy in enabling Saintfield to grow in line with its revised town status. If housing delivery is constrained by land availability, the settlement may be unable to realise its intended role within the hierarchy, with implications for population retention, service viability, and the achievement of wider spatial objectives.
55. The plan suggests that accommodating future growth within the plan period is likely to require consideration of additional land that is capable of being brought forward for housing development albeit at the Local Polices Plan stage. This includes land that is readily available, deliverable, and capable of contributing to housing supply in a timely manner. Without such provision, the Plan Strategy may face challenges in ensuring effective housing delivery and in supporting the sustainable growth of Saintfield as a designated small town.
56. Strategic Policy HS3 contains several positive elements that support a structured and plan-led approach to housing delivery. However, as currently drafted, it raises soundness concerns in relation to consistency with departmental policy and coherence, realism, implementation, and flexibility.
57. We consider the Plan to be made to be in clearer alignment with SPPS requirements on availability and deliverability. The plan is unsound and clearer transparent mechanisms for

releasing land and site delivery should be provided at this stage with comprehensive criteria to enable flexibility in the face of changing circumstances such as network capacity or environmental concerns.

58. This representation has undertaken an assessment of the published draft Plan Strategy against the soundness tests set out in Development Plan Practice Note 6 – Soundness. On the basis of that assessment, it is concluded that the Plan Strategy, as currently drafted, presents unsoundness in relation to the Strategic Growth and Housing Allocation and the operation of Strategic Policies HS1, HS3, SGS1, SETT 1.
59. With regard to counter of existing site-specific Representations, we disagree with NMD-DPS-037, in that significant high density housing land remains undeveloped in Crossgar. This land can easily accommodate projected uplift and expected growth across the plan period in Crossgar. This representation undermines the objective of the plan's growth Strategy and housing allocation and is unsound.
60. Undelivered allocations within existing zoned housing land should be displaced on nearby commuter towns such as Saintfield, that can easily absorb expansion to address housing supply and demand via sustainable realistic schemes rather than allocations be held by long term uncommitted housing zonings.
61. We strongly disagree with further saturation of pockets of undeveloped piecemeal land in Crossgar being considered for housing on lands such as detailed within this representation that if, included within the plan will further hold allocation that has no prospect of delivery. The plan should ensure flexibility of unused housing allocation at the Local Policies Stage, outwardly to nearby commuter towns to promote the social, economic and community provisions.
62. With regard to Rep NMD-DPS-004, we disagree in that no rationale has been provided to warrant representation aligned with Development Plan Document Note 6 and therefore should be discounted. Policy included does not relate to subject plan strategy.
63. We consider detail put forward in Rep NMD-DPS-013 to be accurate and aligned with the draft plan strategy polices.
64. We agree with fundamentals put forward and broadly with detail regarding Saintfield within representation NMD-DPS-074, however there would appear to be sequentially preferable more available sites. That being said on consideration of supporting technical data we consider there to be sufficient surplus allocation within the town currently and should the allocation be uplifted to reflect the town status of Saintfield to permit this representation and this representation within the plan period currently or at the Local Polices Plan stage.
65. Respectfully we would ask the Council to consider the uptake and allocation of site outline in red below (Figure 1) for housing within the plan period, the site is sequentially preferable in that it is located on land (App.40m west of 50 Lisburn Road, Saintfield)

immediately adjacent to the settlement limit (Figure 2) and bounded to the immediate east by approved residential develop LA07/2023/2383/F.

- 66. It is noted that should the proposal site be included within the development limit that a visual break would still remain west of this site, between the settlement limit and development in the countryside.

**Figure 1**



**Figure 2**

