

Dear Sir / Madam,

DfC HISTORIC ENVIRONMENT DIVISION COUNTER REPRESENTATION – NEWRY MOURNE & DOWN DRAFT PLAN STRATEGY

In accordance with Regulation 18 of the Planning (Local development Plan) Regulations (NI) 2015 please find attached a counter representation in relation to the above consultation.

I would be grateful if you could confirm receipt.

NOTE: Consent to Public Response

Under planning legislation, we consent to the publication of our responses received in relation to the counter representation. However, we ask that the names, contact numbers, signatures and e-mail addresses of individuals named are redacted. We are content for the details of the Department/organisation to be published.

Yours sincerely,

[Redacted Signature]
Second Floor | 2 Titanic Boulevard | Belfast | Antrim | BT3 9HQ

Contact: ☒ [Redacted Contact Information]

Supporting people, Building communities, Shaping places

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	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Address	<input type="text"/>
Telephone Number	<input type="text"/>
Email Address	<input type="text"/>

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: DfC Historic Environment Division

SECTION B.

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

Yes No

If yes, please provide your Reference Number DPS-069

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.

Representations: 2, 3, 6, 7, 8, 9, 10, 11, 14, 17, 18, 21, 23, 26, 27, 30, 31, 33, 37, 38, 39, 40, 41, 45, 46, 47, 49, 50, 51, 53, 55, 56, 58, 59, 60, 61, 62, 63, 64, 65, 68, 70, 72, 73, 74, 75, 78, 79, 83, 90, 91, 97, 99, 101

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.

Please refer to attached letter dated 20th April 2026.

(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

Date



Department for
Communities

www.communities-ni.gov.uk

Historic Environment Division

Second Floor

2 Titanic Boulevard

Belfast,

BT3 9HQ

Telephone: (028 90569840)

Email [REDACTED]
[REDACTED]

Date: 20/04/2026

Dear Sir / Madam,

RE: Historic Environment Division Counter Representation to representations received for Newry, Mourne and Down District Council draft Plan Strategy (dPS)

Historic Environment Division (HED) has reviewed the representations made to Newry, Mourne and Down District Council and provides general comment in relation to the following representations:

2, 3, 6, 7, 8, 9, 10, 11, 14, 17, 18, 21, 23, 26, 27, 30, 31, 33, 37, 38, 39, 40, 41, 45, 46, 47, 49, 50, 51, 53, 55, 56, 58, 59, 60, 61, 62, 63, 64, 65, 68, 70, 72, 73, 74, 75, 78, 79, 83, 90, 91, 97, 99, 101

The above listed representations all include site location maps identifying parcels of land for consideration as zoned development lands; residential or otherwise. Many of these sites have potential impacts on the historic environment, often with heritage assets (sometimes including statutorily designated assets) identified either within, adjacent to, or in proximity of, the site boundaries. Others may well have the potential to impact previously unidentified remains.

The PAC Procedures for '*Independent Examination of Local Development Plans*' Version 2 December 2019, however notes that '*...the Commissioner's report will be on the soundness of*

the plan and not on individual representations or sites. This represents a fundamental change from the development plan system that existed before the 2011 Planning Act came into force.' (para 12).

Taking into account the 'soundness' requirements of **Consistency Test (C3)** and **Coherence and effectiveness test (CE2)** HED considers the proposed zoning of sites in these representations to be premature at this stage of the local development plan process and more appropriately assessed at the Local Policies Plan (LPP) stage, in response to Council proposals, based on robust evidence and assessment against adopted Plan Strategy policies. HED has therefore reserved comment on the potential impacts of site specific land zonings on affected heritage assets until this stage, also mindful of the potential for changing circumstances within the LPP development timeframe.

Due to the potential for significant impacts on the listed building and its setting, a brief comment has been provided below in respect of 'DPS – 50 Ardnabannon' which seeks to include Ardnabannon House, a Grade B1 listed building and subject lands (Appendix 1), within the settlement limit of the village of Annsborough.

Ardnabannon House is a fine example of a mid-1860s two storey Italianate style gentleman's residence, set within a small parkland demesne at the eastern end of the former mill village Annsborough. HED is cognizant the building is currently vacant and on the Heritage At Risk Register.

The subject lands for inclusion in the settlement limit, as identified in Appendix 1 of the representation, comprises much of the immediate setting of the listed building, including the pink wash area¹ to the SW as identified on the listing map. The historic ordinance survey maps show the planned landscape surrounding Ardnabannon House and design intent of how the main house was planned to be seen, appreciated, enjoyed and experienced in its immediate setting, contributing to its special interest.

¹ The purpose of the pink wash is to communicate to the Local Council a zone near the listed building where consultation should be considered. It often appears on Area Plans as a zone around a listed building where special controls apply. Though this indicates an important part of the setting of a listed building it is not considered to be the full extent of the setting or a definition of curtilage. Please refer to HED Guidance on Setting and the Historic Environment for further information on setting:<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/guidance-on-setting-and-the-historic-environment.pdf>

The identified lands also fall within a designated Local Landscape Policy Area (LLPA) protected for its intrinsic landscape, environmental value and character (SPPS 6.30).

In the absence of a robust assessment and evaluation against historic environment evidence bases and an adopted Plan Strategy policy framework, the potential impacts of the proposed site allocation on the special interest of the listed building and its setting remain unclear and would more appropriately be assessed at the LPP stage. This should not, however, preclude positive engagement on options and appraisals for Ardnabannon House under the current policy framework toward the securing proposals for the sympathetic and sustainable reuse of this locally significant heritage asset synonymous with Annsborough's industrial past.

In preparation of the LPP, Councils, when considering the site-specific lands uses, must ensure that proposals are founded on a robust assessment of the historic environment evidence base to inform land zonings for development. Councils must also demonstrate how this has been taken into account, and how it has been utilised to inform potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. for evaluation and identification, of previously unidentified archaeological remains.

The above comments are made toward ensuring that land zoning is carried out in accordance with the requirements of **soundness** under the **Consistency Test (C3)** and **Coherence and Effectiveness Test (CE2)**.

HED has also recently published '*Guidance on the Historic Environment and Site Allocations in Local Development Plans*' aimed to assist Councils take into account historic environment considerations in the LDP process toward satisfying the tests of soundness.

[Guidance and information sources to assist councils in preparation of Local Development Plans | Department for Communities](#)

Note: HED encourages the Council to review the format of public representations to improve user needs; i.e.

- a. Filtering representations by topic heading and/ or relevant sections from the draft Plan Strategy to which they were responding; and
- b. Digital word searching of the scanned PDF representations.

Improvements in these areas would provide a more efficient filter facility, saving time and enabling targeted searches, pertinent to topic interest.

HED has welcomed the positive engagement with the Council in preparation of the draft Plan Strategy and looks forward to further liaison in preparation of its Local Policies Plan.

If there are any queries about the content of this response we can be contacted via the address above.

Yours sincerely,

[Redacted signature]

[Redacted signature]

HERITAGE RECORDS AND DESIGNATIONS BRANCH