

**ITEM NO** 8  
**APPLIC NO** LA07/2015/0545/F Full **DATE VALID** 7/3/15  
**COUNCIL OPINION** REFUSAL  
**APPLICANT** Mr P Smith C/O Agent **AGENT** O'Callaghan  
 Planning Unit 1  
 10 Monaghan  
 Street  
 Newry  
 BT35 6BH  
 028 30835700

**LOCATION** 40 metres south west of 23a Castlewellan Road  
 Hilltown

**PROPOSAL** Erection of dwelling and detached garage on a farm

<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>
	0	0	0	0

<b>Addresses</b>	<b>Signatures</b>	<b>Addresses</b>	<b>Signatures</b>
0	0	0	0

- 1 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the ancillary works (access arrangement) do not integrate with their surroundings and therefore would not visually integrate into the surrounding landscape.
- 2 The proposal is contrary to Planning Policy Statement 3, Policy AMP 3 Access to Protected Routes in that it would, if permitted, result in the creation of a new vehicular access onto a Main Traffic Route (Protected Route), thereby prejudicing the free flow of traffic and conditions of general safety.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** LA07/2015/0545/F

**Date Received:** 29<sup>th</sup> June 2015

**Proposal:** Site for farm dwelling and garage

**Location:** The site is located in the Crotlieve ward along the main Castlewellan Road just outside (0.2Km) the northern development limit of Hilltown. The B8 Castlewellan Road is a Protected Route.

**Site Characteristics & Area Characteristics:**

The proposed site is immediately adjacent to the farm at No. 23 Castlewellan Road. The proposed site includes two fields, one at the roadside and the other adjoining and to the rear of the roadside field. The site is clearly visible from the road when travelling north towards Castlewellan. The front portion of the site appears very open as it is a section of a larger field. There is no southern boundary but the northern boundary is defined by a 2m high post and wire fence and a row of semi-mature trees. The rear portion of the site is a small field with natural boundaries on these sides and the farm complex comprising the fourth boundary. A stone wall runs along the roadside boundary. A field gate is located along the road at the proposed site entrance.





Aerial photograph clearly indicates the additional screening around the portion of the site where the revised scheme shows the proposed dwelling. A dwelling here will appear to cluster and visually link with the existing farm complex. The western boundary will screen the dwelling from views from the Castlewellan Road.

**Site History:**

There is no relevant site history.

**Planning Policies & Material Considerations:**

- Banbridge, Newry and Mourne Area Plan 2015.
- Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS): Planning for Sustainable Development.
- Planning Policy Statement 3 Access (PPS3), Movement and Parking Policy AMP2 and 3 including the consequential amendment contained in Annex 1 of PPS 21
- Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.

**Consultations:**

Statutory - Department of Rural Development Countryside Management Compliance Branch – has confirmed the farm business ID has been in existence for more than 6 years.

Statutory - NI Water has no objections and recommends a number of standard informatives.



Statutory - Transport NI has no objections but notes at the end of the response that the B8 is a protected route and Planning must be satisfied that this application falls within the exceptions listed in the policy relating to new accesses onto protected routes. If this application does not fall within these exceptions listed then it should be refused.

NIEA Archaeology and Built Heritage is content with the proposal, Water Management Unit had no objections, standard informatives

### **Objections & Representations**

No objections received.

### **Consideration and Assessment:**

This site is located within the rural area as designated within the Banbridge, Newry and Mourne Area Plan 2015 and is part of the Mourne AONB.

Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS): Planning for Sustainable Development.

Page 53 relates to dwellings on farms: provision should be made for a dwelling house on an active and established farm business to accommodate those engaged in the farm business or other rural dwellers. It notes that dwellings on farms must also comply with policies regarding integration and rural character.

Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.

PPS 21 policies CTY 1, CTY 8, CTY 10, CTY 13, CTY14 and 16 apply.

CTY 1 Development in the Countryside, assesses the need for this proposal within the rural area. A number of exceptions are listed and these include 'a dwelling on a farm'. CTY 1 also notes that 'All proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings and to meet other planning and environmental considerations including those for drainage access and road safety.

Policy CTY 8, states "Planning permission will be refused for a building which creates or adds to a ribbon of development". The supporting text adds at paragraph 5.32 that 'Ribbon development has consistently been opposed and will continue to be unacceptable. I don't consider ribbon development to be an issue for this application.

CTY 10 Dwellings on farms – permission will be granted where a) the farm business has been active for over 6 years and b) no development opportunities have been sold from the farm holding in the last 10 years and c) the new building is **visually linked or sited to cluster** with an established group of buildings on the farm.



The policy then notes "In such circumstances the proposed site must also meet the requirements of CTY 13(a-f), CTY 14 and CTY 16".

DARD has confirmed that there has been an active farm business for over 6 years. I am satisfied that the farm is active and established for the purposes of CTY 10 criteria a and b.

A planning history search shows that no other sites have been approved for dwellings on the farm.

I accept that a dwelling on the proposed site would be visually linked and sited to cluster with the existing farm complex.

Following discussions with the agent regarding concerns on the siting and design of the dwelling, revised plans were submitted on 4<sup>th</sup> May 2016. These plans showed the dwelling set back to the rear of the overall site so the dwelling would appear to cluster with No. 23 and benefit from the existing vegetation to the rear. The overall size of the dwelling was reduced and it is now proposed for a 1.5 storey dwelling of simple form and proportions. 7.1m to finished floor level, 14m front width with 5m side projection for a sunroom. Smooth render finish and natural stone detailing on porch and sunroom. Ground floor area approximately 150m<sup>2</sup>. Single storey double garage.

CTY 13 and CTY 14 relate to new buildings in the countryside and are therefore a material consideration for all planning applications in the rural area.

CTY 13 assesses the impact this proposal will have on the rural area by reason of design, siting, integration and landscaping. The site itself has limited screening and long established boundaries however as the dwelling is proposed to be set back from the road close to the existing farm buildings.

The dwelling was originally proposed in the roadside field of the application site. This part of the site is very open and there are long critical views into the site from the Castlewellan Road. Following discussions with the agent a revised site plan was submitted with the dwelling set back from the road to take advantage of the natural boundaries in the field in the rear area of the red line boundary.

CTY 13 also includes the assessment of access and other ancillary works.

Paragraph 5.71 notes that "New accesses are often a visible feature of new buildings in the countryside and on occasion can be more obtrusive than the building itself, particularly if they include ornate walls, gates and fencing. Accordingly it will often be necessary to attach a condition removing permitted development rights for such boundary features in the interests of preserving the amenity and rural character of an area".

Paragraph 5.72 adds "Wherever possible access to a new building should be taken from an existing lane-way".

The proposed access will cut across a relatively flat field, the applicant has proposed to use dry stone walls along the entrance to conceal the access from obvious view. I consider the relocation of the existing post and wire fence from the roadside and its re-siting some 12 metres back from the road edge to provide the southern visibility splay to be damaging to the character of the area. The site should be accessed from the existing farm access that serves No. 23 and 23a.

CTY 14 assesses the impact this proposal will have on the rural character of the immediate area. It notes that planning permission will be granted for a building in the countryside where it does not cause a detrimental change to, or further erode the rural character of an area.

A new building will be unacceptable where:

- (a) it is unduly prominent in the landscape; or
- (b) it results in a suburban style build-up of development when viewed with existing and approved buildings; or
- (c) it does not respect the traditional pattern of settlement exhibited in that area; or
- (d) it creates or adds to a ribbon of development (see Policy CTY 8); or
- (e) the impact of ancillary works (with the exception of necessary visibility splays) would damage rural character.

The revised siting has overcome any issues of integration that were apparent under the originally proposed site at the roadside field.

The amplification notes: at paragraph 5.78 that in assessing the cumulative impact of a building on the rural character the following matters should be taken into consideration. These include intervisibility of the building with existing development, the vulnerability of the landscape and the siting of the proposal.

The revised siting of the dwelling to the rear field will improved the 'clustering' effect required under CTY 10. The new dwelling should appear as part of the farm complex rather than a separate dwelling detached from the farm.

I am satisfied that by siting the dwelling in the rear field the proposal will cluster with the existing farm complex. The issue is the access arrangement directly off the B8 Castlewellan Road.

PPS 3 Access Movement and Parking Policy AMP 2, access to public roads notes that planning permission will only be granted for a development involving direct access or the intensification of the use of an existing access onto a public road where: a) such access will not prejudice road safety or significantly inconvenience the flow of traffic and b) the proposal does not conflict with Policy AMP3 Access to Protected Routes.

Policy AMP 2 states:

Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public road where:

- a) such access will not prejudice road safety or significantly inconvenience the flow of traffic; and
- b) the proposal does not conflict with Policy AMP 3 Access to Protected Routes.

Policy AMP 3 was clarified in October 2006 and then again in June 2010 when PPS 21 was published, the revised policy states:

#### Other Protected Routes – Outside Settlement Limits

Planning permission will only be granted for a development proposal involving access onto this category of Protected Route in the following cases:

(b) A Farm Dwelling – where a farm dwelling would meet the criteria set out in Policy CTY 10 of PPS 21 and access cannot reasonably be obtained from an adjacent minor road. Where this cannot be achieved proposals will be required to make use of an existing vehicular access onto the Protected Route.

Significant correspondence has taken place between the applicant with relation to the access arrangement on this application. There is an existing access that serves No. 23 and the farm holding off the B8. The agent provided plans on 4<sup>th</sup> May 2016 showing the existing access arrangement at No. 23. This shows sight splays of 2.4x 22.5 to the north and 2.4 x 14 to the south. This is the access that should be utilised for the farm dwelling. The applicant maintains that as he does not control the land to the north therefore the existing access cannot be upgraded to meet the required standards. There is no adjacent minor road that could be used to serve the site. As such the application fails Policy AMP 3.

#### **Recommendation:**

The siting and design of the dwelling house is acceptable. The issue for this application is the proposed access arrangement.

Refusal. CTY 13 and AMP 3.



**Refusal Reasons**

- 1. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the ancillary works (access arrangement) do not integrate with their surroundings and therefore would not visually integrate into the surrounding landscape.
  
- 2. The proposal is contrary to Planning Policy Statement 3, Policy AMP 3 Access to Protected Routes in that it would, if permitted, result in the creation of a new vehicular access onto a Main Traffic Route (Protected Route), thereby prejudicing the free flow of traffic and conditions of general safety.

<b>Case Officer Signature</b>	
<b>Date</b>	
<b>Appointed Officer Signature</b>	
<b>Date</b>	

<b>ITEM NO</b>	<b>12</b>			
<b>APPLIC NO</b>	LA07/2016/0150/O	Outline	<b>DATE VALID</b>	2/3/16
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>			
<b>APPLICANT</b>	Alan & Ronald Davidson 17 Ardaragh Road Newry BT34 1NY	<b>AGENT</b>	Collins & Collins 18 Margaret St Newry BT34 1DF 30266602	
<b>LOCATION</b>	Adjacent and immediately south of No.17 Ardaragh Road Newry Co. Down BT34 1NY			
<b>PROPOSAL</b>	Erection of managers dwelling and domestic garage			
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>
	0	0	0	0
			<b>Addresses</b>	<b>Signatures</b>
			0	0 0 0

- 1 The proposal is contrary to the Strategic Planning Policy Statement (SPPS), Policies CTY1 and CTY7 of Planning Policy Statement 21, Sustainable Development in the Countryside and does not merit being considered as an exceptional case in that it has not been demonstrated that there is a site specific need for the proposed dwelling that makes it essential for an employee to live at the site of their work.
- 2 The proposal is contrary to Policy CTY8 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the proposal would, if permitted, result in the creation of ribbon development along Ardarragh Road.
- 3 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the proposed site lacks long established natural boundaries and is unable to provide a suitable degree of enclosure for the building to integrate into the landscape and therefore would not visually integrate into the surrounding landscape.
- 4 The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the building would, if permitted create or add to a ribbon of development and would therefore result in a detrimental change to further erode the rural character of the countryside.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** LA07/2016/0150/O

**Date Received:** 3<sup>rd</sup> February 2016

**Proposal:** Site for farm managers dwelling and garage

**Location:** The site is adjacent and immediately south of No.17 Ardaraugh Road approximately 4Km west of Rathfriland which is located in the crotlieve ward of the district.



The proposed site is adjacent and south of the existing dwelling (No. 17



### Site Characteristics & Area Characteristics:

An access lane from the Ardarragh Road serves No. 17 and the farm business building located to the rear. No. 17 is a single storey dwelling finished in red brick, the building to the rear is a grey industrial shed approximately 20m x 20m and 6m in height. There are 2No. silos at the building





View towards the application site, No. 17 is in the foreground with the shed/workshop to the rear.

### Site History:

There is no relevant site history. There are planning approvals for the bungalow but there is no planning history for the industrial shed at the rear of No. 17. On the Land and Property Services website the property is listed as house, garden, workshop. These Google images dated April 2011 show the buildings to the rear in place therefore they would be immune from any enforcement action. A Certificate of Lawfulness may be required to confirm this fact.

### Planning Policies & Material Considerations:

- Banbridge, Newry and Mourne Area Plan 2015.
- Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS): Planning for Sustainable Development.
- Planning Policy Statement 3 Access (PPS3), Movement and Parking Policy AMP2.
- Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.



**Consultations:**

NI Water has no objections and recommends a number of standard informatives,  
Transport NI no objections.

NIEA Water Management Unit had no objections, standard informatives

Environmental Health Department has no objections, standard advice,

Loughs Agency – no objections standard advice.

**Objections & Representations**

No objections received. Five neighbours notified. Advertised in five local papers on 8/2/2016

**Consideration and Assessment:**

This application has been submitted for a farm managers dwelling in association with Ardarragh Livestock Feeds. The supporting information states that the business has been in existence prior to 2009 (over 6 years). The information included a blank invoice document from Ardarragh Livestock Feeds.

This site is located within the rural area as designated within the Banbridge, Newry and Mourne Area Plan 2015.

Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS): Planning for Sustainable Development.

Page 53 relates to dwelling on farms: provision should be made for a dwelling house on an active and established farm business to accommodate those engaged in the farm business or other rural dwellers.

Page 53 also relates to dwelling for non-agricultural business enterprises and notes that a site specific need must exist that makes it essential for an employee of the business to live at the site of their work.

Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.

PPS 21 policies CTY 1, CTY 7, CTY 8, CTY 13, CTY14 and 16 apply.

CTY 1 Development in the Countryside, assesses the need for this proposal within the rural area and lists a number of exceptions. CTY 1 also notes that 'All proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings and to meet other planning and environmental considerations including those for drainage access and road safety'.

The initial supporting statement dated February 2016 referred to CTY 10 and stated that the applicants were farm business members and that the business was active and established prior to 6 years.

CTY 10 relates to dwelling on farms (my emphasis) – permission will be granted where a) the farm business has been active for over 6 years and b) no development opportunities have been sold from the farm holding in the last 10 years and c) the



new building is visually linked or sited to cluster with an established group of buildings on the farm.

The existing business operation is not considered to be an 'active and established' farm business (in the definition defined by the SPPS and PPS21) and there is no DARD business ID connected to it.

Ardarragh Livestock Feeds involves the *manufacture* of livestock feed and *sale* of farm equipment such as posts, wire, feeders, mineral buckets etc is not considered to be an agricultural business therefore the application will be assessed under CTY 7.

In order to demonstrate the need for a dwelling under CTY 7 for the business an amended supporting statement was submitted on 7/6/2016.

The statement notes that the farm business (Ardarragh Livestock Feeds) has been a registered business for 15 – 16 years. The parents of the applicant have lived in the adjoining property, No. 17 Ardarragh Road for many years which is where the business has been managed up until now.

CTY 7 - Planning permission will be granted for a dwelling house in connection with an established non-agricultural business enterprise where a site specific need can be clearly demonstrated that makes it essential for one of the firm's employees to live at the site of their work. (underlining my emphasis)

Paragraph 5.30 of the amplification notes applicants must provide sufficient information to show that there is a site specific need which makes it essential for one of the firm's employees to live at the site of their work, as against a general desire for a dwelling in association with the business.

The supporting statement notes at page 7 the reasons why the application is essential and site specific. These include:

- The business runs 24/7 and operates on an 'on call' basis for the local farming community;
- Former manager (lives in No. 17) is approaching 60. Another person living on the site is needed to relieve the pressure of this labour intensive role.
- Limited shed space makes it difficult to prepare sufficient animal feed for opening hours. On a busy day the barley roller is in constant use and must be supervised at all times. This machine is often used out of hours when the manager tends other commitments therefore a second person is required, who is trained and capable to maintain operation of the machine;
- Dangerous machinery is used in the business, two people are required on site in case of an emergency. Diet feeder is used constantly to make feed often outside opening hours;
- Farmers calling to the business 'out of hours'
- Delivers made 6am-midnight somebody needs to be on site at all times to take/check deliveries and this cannot be achieved by the current manager alone.

- No. 17 has been broken into several times, a second house at the site would add to the security of the site.

Upon considering the reasons set out above, I am not convinced that a second dwelling is necessary on the site. A dwelling is a permanent addition to the landscape and the need for this relatively small rural business to require 2No. dwellings to run efficiently would be unusual.

The supporting information notes that due to limited shed space it is difficult to prepare sufficient feed on time for opening hours. No information has been submitted as to whether an extension of the existing shed may relieve some of the current pressures on the site/business operation.

#### Ribbon development

Policy CTY 8, states "Planning permission will be refused for a building which creates or adds to a ribbon of development". The supporting text adds at paragraph 5.32 that 'Ribbon development has consistently been opposed and will continue to be unacceptable.

#### Integration and Rural Character

CTY 13 and CTY 14 relate to new buildings in the countryside and are therefore a material consideration for all planning applications in the rural area.

CTY 13 assesses the impact this proposal will have on the rural area by reason of design, siting, integration and landscaping. The site itself has limited screening and lacks long established boundaries. A dwelling would be clearly visible when travelling either direction along Ardarragh Road.

CTY 14 assesses the impact this proposal will have on the rural character of the immediate area. It notes that planning permission will be granted for a building in the countryside where it does not cause a detrimental change to, or further erode the rural character of an area.

A new building will be unacceptable where:

- (a) it is unduly prominent in the landscape; or
- (b) it results in a suburban style build-up of development when viewed with existing and approved buildings; or
- (c) it does not respect the traditional pattern of settlement exhibited in that area; or
- (d) **it creates or adds to a ribbon of development (see Policy CTY 8);** or
- (e) the impact of ancillary works (with the exception of necessary visibility splays) would damage rural character.

The amplification notes: at paragraph 5.78 that in assessing the cumulative impact of a building on the rural character the following matters should be taken into consideration. These include intervisibility of the building with existing development, the vulnerability of the landscape and the siting of the proposal.

With this in mind it is clear that a dwelling at the proposed location will be clearly viewed along with No.17 Ardarragh Road. The proposed site adjacent to No. 17 is

such that it will add to the existing line of development and therefore further erode the rural character of the area.

#### Policy CTY16 — Development relying on non-mains sewerage

The PI Form states that a Treatment Plant is to be used for sewage disposal. The Environmental Health consultation response dated 20/04/2016 states no objection to the proposal provided a 'Consent to Discharge of Effluent' is obtained prior to the commencement of development. As this requirement is to satisfy other legislation, it will be added as an informative rather than a condition.

#### Standard informatives from NI Water response dated 25/04/2016

PPS 3 Access Movement and Parking Policy AMP 2, access to public roads notes that planning permission will only be granted for a development involving direct access or the intensification of the use of an existing access onto a public road where: a) such access will not prejudice road safety or significantly inconvenience the flow of traffic and b) the proposal does not conflict with Policy AMP3 Access to Protected Routes. Transport NI had been consulted and has no objections.

#### **Recommendation:**

From the information submitted, I have not been convinced that a second dwelling is necessary for the efficient running of the existing agricultural business.

In addition, the site appears open and offers little in the way of screening. A dwelling located on this site will read with No. 17 Ardarragh Road and result in the creation of ribbon development.

#### Proposed reasons for refusal.

1. The proposal is contrary to the Strategic Planning Policy Statement (SPPS), Policies CTY1 and CTY7 of Planning Policy Statement 21, Sustainable Development in the Countryside and does not merit being considered as an exceptional case in that it has not been demonstrated that there is a site specific need for the proposed dwelling that makes it essential for an employee to live at the site of their work.
2. The proposal is contrary to Policy CTY8 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the proposal would, if permitted, result in the creation of ribbon development along Ardarragh Road.
3. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the proposed site lacks long established natural boundaries and is unable to provide a suitable degree of enclosure for the building to integrate into the landscape and therefore would not visually integrate into the surrounding landscape.
4. The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the building would, if



permitted create or add to a ribbon of development and would therefore result in a detrimental change to further erode the rural character of the countryside.

<b>Case Officer Signature</b>	
<b>Date</b>	
<b>Appointed Officer Signature</b>	
<b>Date</b>	

<b>ITEM NO</b>	<b>14</b>			
<b>APPLIC NO</b>	LA07/2016/0557/F	<b>Full</b>	<b>DATE VALID</b>	4/26/16
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>			
<b>APPLICANT</b>	Mr and Mrs Oliver Reavey 81 Newtown Road Camlough Newry BT35 7JH	<b>AGENT</b>	Collins and Collins 18 Margaret Street Newry BT34 1DF  02830266602	
<b>LOCATION</b>	85 Newtown Road Camlough Newry BT35 7JH			
<b>PROPOSAL</b>	Retention of dwelling as constructed previously approved under planning ref P/2015/0186/RM			
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>
	0	0	0	0
			<b>Addresses Signatures</b>	<b>Addresses Signatures</b>
			0 0	0 0

- 1 The proposal is contrary to The Strategic Planning Policy Statement for Northern Ireland and Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the design of the proposed building is inappropriate for the site and its locality and therefore would not visually integrate into the surrounding landscape.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** LA07/2016/0557/F

**Date Received:** 03.07.2015

**Proposal:** Retention of dwelling as constructed previously approved under planning ref P/2015/0186/RM

**Location:** 85 Newtown Road, Camlough, Newry, BT35 7JH, South Armagh approximately 1 mile West of the Settlement limit for Camlough.

**Site Characteristics & Area Characteristics:**

*This is a roadside site located adjacent to No 83 Newtown Road, Camlough. The site extends along the rear boundary of this existing dwelling, No 81 and bounds No 79 on the north western side. The land is relatively flat at the roadside and rises gradually towards the north eastern boundary. At the time of my site visit construction was at an advanced stage with the new dwelling completely intact. Landscaping of the site was at an on-going stage. The site is within the rural area where development pressure is increasing.*

**Site History:**

P/2015/0186/RM - Private dwelling & domestic garage - Adjacent to and north and north west of no. 79 Newtown Road, Sturgan, Camlough – Permission Granted – 27/10/2015

P/2000/0325/O - Domestic dwelling - Adjacent to 83 Newtown Road, Camlough, Newry - Sturgan TD – Permission Refused 04.08.2000

P/2011/0440/O - Adjacent North & North West of No 79 Newtown Road, Camlough, Newry BT35 7JJ – Appeal Dismissed - 03.06.2013

P/2014/0581/O - Private dwelling and domestic garage - Adjacent to and North and North West of No 79 Newtown Road, Camlough, Newry, BT35 7JJ

LA07/2016/0013/CA – Alleged dwelling not being constructed in accordance with approval- Adjacent to and North and North West of No 79 Newtown Road, Camlough, Newry, BT35 7JJ - Enforcement case on going.



**Planning Policies & Material Considerations:**

*Banbridge Newry and Mourne Area Plan 2015*

*Strategic Planning Policy Statement*

*Planning Policy Statement 21*

*Planning Policy Statement 3 / Development Control Advice Note 15*

*Building on Tradition*

**Consultations:**

*Transport NI – No objections.*

**Objections & Representations**

3 Dwellings notified on 12.05.2016

Application Advertised on 11.05.2016

No objections or representations received.

**Consideration and Assessment:**

Strategic Planning Policy Statement / Banbridge Newry and Mourne Area Plan 2015  
The Strategic Planning Policy Statement is a material consideration for this application however as there is no significant change to the policy requirements for single dwellings following the publication of the SPPS and it is arguably less prescriptive, the retained policy of PPS21 will be given substantial weight in determining the principle of the proposal in accordance with paragraph 1.12 of the SPPS / BNMAP 2015. The site lies within the Rural Area as designated in the Banbridge Newry and Mourne Area Plan 2015. There are no objections with regard to the Area Plan.

**Principle of Development**

The previous application P/2015/0186/RM was approved on 27.10.2015 with the standard time condition. As this application was received on 03.07.2016 the application remains live and determining weight is given to P/2015/0186/RM. The principle of development is established.

The layout of the site including the access replicates that previously approved under P/2015/0186/RM with the main area of discussion, the proposed design. It is noted that a similar design albeit with a lower ridge height was originally submitted as part of the RM application. However this was considered unacceptable at an early stage and a new design with a single storey storm porch and the chimneys located on the ridge of the dwelling was requested prior to approval. In addition to this the rear dormer and upper windows were asked to be removed to comply with the floor restriction imposed at Outline stage. The design for the dwelling under this current application differs from the previous approval in that the a first floor has now been included measuring approximately an additional 97 sq. m. The ridge has been increased by just under a metre and the porch increased in height by approximately 1.8m. A chimney has been located off the ridge of the dwelling, an extra velux window added to the roof at the front and a dormer window added to the rear.

To determine the acceptability of design in the rural area, material consideration is given to supplementary guidance contained in Building on Tradition and the existing development in the area. Page 100 of Building on Tradition shows poor and unacceptable design which includes 2 storey projecting bay windows, porches and

apses. The proposed design includes a 2 storey porch (which was previously decided as unacceptable in the RM application) which appears dominant on the front elevation, out of character with the surrounding dwellings and when considered against the open and exposed nature of the site, appears intrusive at the critical view points along Newtown Road particularly when travelling East. The raised height of the dwelling is out of keeping with the existing character along this stretch of road with neighbouring dwellings Nos 83, 81, 79, 75 and 31 all of a single storey nature and I would concur with the Outline condition of a 5.5m ridge height which would allow the development integrate on to the site more fully and respect the existing development in the area. The additional floor space is not of itself visually intrusive however as explained above it is the increased ridge height to accommodate this that is unacceptable. The chimney off the ridge, whilst is not a traditional feature or one that is encouraged in Building on Tradition, it is however found on neighbouring dwellings therefore the Council can have little objection. The dormer to the rear will not be visually intrusive and is considered acceptable given the limited views. The materials and finishes are acceptable. Whilst the proposal meets the other policy considerations of CTY13 it does however fail part (e) in that the design of the building is inappropriate for the site and its locality.

**Recommendation:**

*Refusal*

**Refusal Reasons:**

1. The proposal is contrary to The Strategic Planning Policy Statement for Northern Ireland and Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the design of the proposed building is inappropriate for the site and its locality and therefore would not visually integrate into the surrounding landscape.

**Case Officer:****Authorised Officer:****Reconsideration**

This application was previously heard at the Committee and the Committee decided that the application should be returned to allow a meeting between the Planning Department and the Agent. This meeting was held on 29<sup>th</sup> November 2016 and the Planning Department advised the agent that the 2 storey porch element of the schema as built is unacceptable and should be reduced to a single storey porch. The agent advised that they would not be doing this and hinted towards a Planning Appeal. The agent advised that they could put a slate finish on the side and front elevations of the porch to match the existing roof. The Planning Department advised that this would be unacceptable and would be returned to the Planning Committee for determination. The agent was given a period of 14 days to submit amended plans. On 10<sup>th</sup> January 2017 the agent

submitted the amended plans which reflect what he had said he would do at the meeting and thus these plans are considered unacceptable and the refusal reason stands that the proposal is contrary to The Strategic Planning Policy Statement for Northern Ireland and Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the design of the proposed building is inappropriate for the site and its locality and therefore would not visually integrate into the surrounding landscape.



<b>ITEM NO</b>	<b>13</b>				
<b>APPLIC NO</b>	LA07/2016/0408/F	Full	<b>DATE VALID</b>	6/16/16	
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>				
<b>APPLICANT</b>	Garvan and Helen Walsh and Turkington 68 Orwell Road Rathgar Dublin 6		<b>AGENT</b>	Emma Speers Architects 33 Dunnaval Road Ballyardle Kilkeel BT34 4JT	NA
<b>LOCATION</b>	99 Windmill Road Cranfield Kilkeel Newry BT34 4LP				
<b>PROPOSAL</b>	Application for proposed replacement dwelling house and garage as substitute for previously approved planning application P/2013/1764/F				
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>	
	0	0	0	0	
			<b>Addresses</b>	<b>Signatures</b>	<b>Addresses</b>
			0	0	0

- 1 The proposal is contrary to paragraphs 3.13 and 6.42 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) in that this area of the coast is known to be at risk from coastal erosion.
- 2 The proposal is contrary to paragraph 6.176 of the Strategic Planning Policy Statement for Northern Ireland and Policy NH1 of Planning Policy Statement 2, Natural Heritage, in that the site lies adjacent to a proposed Special Protection Area / Ramsar Site (Carlingford Lough extension) and it has not been demonstrated that the proposal will not have a likely significant effect on the protected habitat which supports terns.
- 3 The proposal is contrary to Policies CTY1 and CTY3 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the overall size of the proposed replacement dwelling would have a visual impact significantly greater than the existing building and the design of the replacement dwelling is not of a high quality appropriate to its rural setting and does not have regard to local distinctiveness.
- 4 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the design of the proposed building is inappropriate for the site and its locality and therefore would not visually integrate into the surrounding landscape.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** LA07/2016/0408/F

**Date Received:** 16<sup>th</sup> June 2016

**Proposal:** Proposed replacement dwelling

**Location:** 99 Windmill Road, Cranfield, Killeel

**Site Characteristics & Area Characteristics:**

The proposed dwelling is a former lighthouse cottage (built c. 1068), located on the most southerly tip of Northern Ireland. The dwelling is located 5m from the edge of the embankment before that land falls sharply into Carlingford Lough. The access road runs along the edge of the eroding coastline and is usable with extreme care as the lane is only finished in rough stone/gravel. The lane stretches some 0.3Km from the last dwelling along Windmill Road where the surface is significantly better.

The access laneway is in bad condition and is not adopted by Transport NI.







**Planning History**

Approval P/2012/0213/F relates to “alterations and extension to dwelling”. Decision dated 09/11/2012.

This application was for a single store extension to the dwelling. The dwelling currently has several small single storey projections and the purpose of this application was to simplify the dwelling.



A number of objections were received in relation to this application with regard to the lane and the heavy vehicles that would be using the access. The case officer advised that this was a civil matter.

Approval was recommended taking into account the sites remote location

Approval P/2013/0764/F relates to "alterations and extension to dwelling". Decision dated 26/2/2014. This proposal is similar to that previously approved under P/2012/0213/F. Overall the proposal seeks to simplify the miss-match of roof pitches and roof levels by streamlining the dwelling and creating extensions to each side of the dwelling (6m x 10m to provide a kitchen) and 12.5m x 9.8m to provide integral garage). Application was approved on the basis of the planning history and although the extensions are not subordinate in their totality in line with PPS 7 addendum, they are not significantly larger than what was previously approved.

Works approved for alterations/extension under P/2012/0213 and P/2013/0764/F have not been implemented yet.

#### **Planning Policies & Material Considerations:**

- Banbridge, Newry and Mourne Area Plan 2015
- Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS): Planning for Sustainable Development.
- Planning Policy Statement 2 PPS2 – Planning and Nature Conservation.
- Planning Policy Statement 3 Access (PPS3), Movement and Parking Policy
- Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.
- Building on Tradition – A Sustainable Design Guide for Rural Northern Ireland
- The UK Marine Policy Statement

#### **Consultations:**

Transport NI – No objections. Transport NI note that if the existing dwelling could be reasonable occupied or following minor modification then there is no objection, if this is not the case, then re-consult. Note that the red line does not adjoin a public road.

Loughs Agency – standard response with advice.

#### **DAERA**

- Marine and Fisheries Division - Coastal Development – proposal is contrary to the Strategic Planning Policy Statement (SPPS) for Northern Ireland.
- Water Management Unit – standard informatives
- Natural Environment Division – Natural Heritage – content with proposals - Condition proposed

A 10 metre buffer must be maintained between the location of refuelling, storage of oil/fuel, concrete mixing and washing areas, storage of machinery/material/spoil and the red line boundary.

Reason: To protect the integrity of Carlingford Lough ASSI.

Informatives in relation to Badgers -Article 10 of the Wildlife (NI) Order and Birds Article 4 of the Wildlife (NI) Order

Environmental Health Department – No objections, standard advice  
NI Water -Standard advice

### **Objections & Representations**

None received. No neighbours have been notified as there are no properties abutting the red line boundary. The application was advertised in the Mourne Observer on 11/4/2016.

### **Consideration and Assessment:**

Section 45 of the Planning Act (Northern Ireland) 2011 requires the Council to have regard to the local development plan, so far as material to the application, and to any other material considerations. The site is currently within the remit of the Banbridge / Newry & Mourne Area Plan 2015 as the new council has not yet adopted a local development plan. The site is outside settlement limits in a rural area and within the Mournes and Slieve Croob Area of Outstanding Natural Beauty. There are no specific policies in the Plan that are relevant to the determination of the application and it directs the decision-maker to the operational policies of the SPPS.

The application site is adjacent to two European and a national designated site:

- Carlingford Lough SPA; this site has recently been extended and is designated under the EC Birds Directive (79/409/EEC on the conservation of wild birds);
- Murlough SAC which is designated under EC Habitats Directive (92/43/EEC on the conservation of natural habitats and of wild fauna and flora); and
- Carlingford Lough ASSI, declared under the Environment Order (Northern Ireland) 2002.

The conservation objectives of Carlingford Lough SPA relevant to this project include the following:

- maintain or enhance the range of habitats utilised by the qualifying species;
- ensure that the integrity of the site is maintained; and most relevant to this project;
- to ensure that the structure, function and supporting processes of habitats supporting the species are maintained in the long term.

DAERA notes in its response "*The cliffs at Windmill Road are composed of glacial sediment and it is widely accepted that this is an area of active coastal erosion. The access to this proposed property at Windmill Road is currently under threat from coastal erosion and part of the road has been damaged.*" The response adds that if permission was granted, it is likely that the applicant will require sea defences to protect the property and to access it. As such it is questioned why further development would be considered along this retreating coastline.

The response continues "*Sediment which is removed from the cliffs forms part of the priority habitat of the SPA, which supports terns which are a designated species of the site. Increasing development in this fragile environment may therefore lead to further instability and ultimately hasten coastal retreat and may be contrary to the conservation objectives of the SPA.*"

DAERA also note that in accordance with Regulation 43 (10 of the Conservation (Natural Habitats etc) (NI) 1995 (as amended), the competent authority (i.e. Planning Department) will need to assess how this proposal either alone or in combination is likely to have a significant effect on the *Natura 2000* sites, particularly Carlingford Lough SPA. The response highlights application LA07/2015/0800/F for coastal defences along Windmill Road to protect a number of residential properties. This application was refused on 18/8/2016 for 4No. reasons relating to coastal erosion and loss of habitat.

Whilst I acknowledge that the two applications are different (LA07/2015/0800/F sought permission for the construction of rock armour revetment sea defences to provide protection to the access road) the common theme for both applications is the fragile coastline at this location and the fact that any development that may cause further damage either through direct works or disturbance of the ground so close to the shore, is wholly inappropriate under the SPPS.

Given that this is an area of coastline known to be actively eroding, the proposed works are in conflict with the Strategic Planning Policy Statement (SPPS) for Northern Ireland.

The SPPS states in section 6.42 that "*development should not be permitted in areas of the coast known to be at risk from flooding, **coastal erosion**, or land instability*".

The agent has made numerous references to the coastal erosion in the vicinity, of note is a small building outside the red line boundary along the access road that was lost during the 2014 storms.

The proposed 1:500 layout of the replacement dwelling notes that the dwelling has been sited further to the north due to concerns regarding significant coastal erosion.

The agent notes in the accompanying supporting statement on page 3 "Previous approval was to extend the existing building but due to the extent of coastal erosion since the previous approval, and the loss of an existing vacant structure east of the site in 2014 it would be considered imprudent not to relocate the proposed dwelling further to the north of the site."



DAERA also highlight that it is also widely accepted that sea level is rising in Northern Ireland and we are experiencing more frequent storm events, as also recognised by the applicant. A core planning principle stated in the SPPS relates to mitigating and adapting to climate change. Section 3.13 states that the planning system should help to address climate change by “**avoiding development in areas with increased vulnerability to the effects of climate change, particularly areas at significant risk from flooding, landslip and coastal erosion and highly exposed sites at significant risk from impacts of storms**”. The proposed site is experiencing both coastal erosion and impact from extreme events (e.g. January storms 2014).

The DAERA response also notes that any works proposed below the Mean High Water Spring Tide may require a Marine Licence. I am content that no sea defences are proposed under this application.

As a follow up to the original response from DAERA, I queried whether the objection was to the access arrangement or to the proposal in its entirety. A response was received on 18<sup>th</sup> August 2016. This response states “*M&FD consider that any further development along this area of coastline would lead to further instability and ultimately accelerate coastal erosion and this may be contrary to the conservation objectives of the SPA*”. The response then concludes “*Therefore M&FD consider that no new development should take place that will add to coastal erosion in this area and that the proposal is unacceptable in its entirety*”. The opinion of DAERA is abundantly clear.

Policy NH1 of PPS2 states that planning permission will only be granted for a development proposal that is not likely to have a significant effect on a European Site (Special Protection Area, proposed Special Protection Area, Special Areas of Conservation, candidate Special Areas of Conservation and Sites of Community Importance) or a listed or proposed Ramsar Site. The equivalent section of the SPPS (paragraphs 6.175 – 6.178) is comparable. The extension to Carlingford Lough SPA/Ramsar falls into this category.

As it has not been demonstrated that there will be no significant effects on the European site, and that instead, the proposal is likely to cause the loss of sediment that forms this protected habitat, it is clearly contrary to this policy. The policy goes on to refer to mitigation where there will be a significant effect.

Under NH 1, permission will only be permitted where there are no alternative solutions and the proposal is considered to be an essential development for imperative reasons of overriding public interest and compensatory measures are agreed. I don't consider the proposal to meet any of these criteria. Even if it were to be considered an exceptional case, the Council could only approve the proposal if it was agreed in advance with the European Commission.

Terns are also a feature of the adjacent Carlingford Lough ASSI (a national designation under the Environment (Northern Ireland) Order 2002). The proposal has the potential to affect their foraging grounds and could therefore have an adverse effect on the ASSI populations of these species. This means the proposal may also be contrary to policy NH3 of PPS2 and the equivalent paragraph 6.183 of

the SPPS. As DAERA have not listed this as a reason for refusal it will be a matter for the Planning Department to consider – discuss at group meeting.



## Assessment of the replacement dwelling under the SPPS and PPS 21

The issue for this application is not whether No. 99 Windmill Road represents a replacement opportunity, it is the location of the site along the eroding shore of Carlingford Lough.

Under the SPPS, page 53 the text states "provision should be made for the replacement of existing dwellings where the building to be replaced exhibits the essential characteristics of a dwelling and as a minimum all external structural walls are substantially intact. Replacement dwellings must be located within the curtilage of the original dwelling where practicable, or at an alternative position nearby where there are demonstrable benefits in doing so. (underlining is my emphasis)

Replacement dwellings must not have a visual impact significantly greater than the existing building. In cases where the original building is retained, it will not be eligible for replacement again.

Planning Policy Statement 21 (PPS21) Sustainable Development in the Countryside.

PPS 21 policies CTY 3, CTY 13, 14 and CTY16 apply.

CTY 3 Replacement Dwellings states that "the proposed replacement dwelling should be sited within the established curtilage of the existing building, unless either (a) the curtilage is so restricted that it could not reasonably accommodate a modest sized dwelling, or (b) it can be shown that an alternative position **nearby** would result in demonstrable landscape, heritage, access or amenity benefits;

Given the response received from DAERA, I consider a new application on an alternative 'off site location' may be viewed sympathetically.

CTY 13 assesses the impact this proposal will have on the rural area by reason of design, siting, integration and landscaping. The design of the proposed dwelling is considered in detail below.

With regard to siting and design, as the site is within the Mourne AONB, Policy NH 6 of PPS 2 - Areas of Outstanding Natural Beauty will apply. The policy states that planning permission for new development within an Area of Outstanding Natural Beauty will only be granted where it is of an appropriate design, size and scale for the locality.

### **Design of proposed dwelling.**

The existing dwelling is a modest cottage, 5.5m to the ridge. The various extensions that have been approved have a maximum ridge height of 6.7m.

The proposed dwelling comprises three principal blocks with contemporary links, white rendered walls, raised stone verges and a natural slate pitched roof.



The proposed ridge is 7.8m at highest point with significant glazing along the western elevation.

I consider the glazing on the north and south elevations to appear unbalanced in terms of solid to wall ratio and the position and size of the windows lack rhythm.

The supporting statement notes at page 9 that "the building footprint is larger than the existing in order to meet the accommodation requirements of the building owners and their family. The proposed plans show a 7 bedroom dwelling with 3 separate living areas and a playroom.

The supporting statement notes "The building footprint is located further north on the site limiting the proximity to the embankment to the south, at risk from further coastal erosion"

Access is proposed using the existing unaltered access along Windmill Road.

I accept that there would be extremely limited critical views of the dwelling but the scale and massing would produce a dwelling of significantly greater visual impact than the existing house or indeed the approved extensions.

Given the response received from DAERA, I consider a new application on an alternative 'off site location' may be viewed sympathetically.

I consider the current design to be inappropriate against both CTY 3 (greater visual impact), CTY 13 and Building on Tradition (design).

### **Recommendation**

Although planning permission remains extant on the site for extension/alterations to No. 99 Windmill Road, these approvals, pre-dated the publication of the SPPS which is a material consideration of significant weight in relation to matters of coastal erosion.

It is considered that although there will be some ground disturbance to implement either of these approvals, the works required to provide a new dwelling would far exceed this.

The area is identified as suffering from coastal erosion, a matter acknowledged by the applicants supporting statement and the very reason for the proposed 'off site' replacement.

Another significant problem for the application is the access road, which runs parallel to the coastline and is evidently suffering from rapid erosion.

The publication of the SPPS on 28/09/2015 introduced a range of new measures to protect our coastlines from development where the land is eroding or unstable. The SPPS was not part of the consideration in the previous applications for the extension/alteration of No. 99 Windmill Road.

The recent refusal of application LA07/2015/0800 has also been an important consideration in this application in terms of the weight accorded to the SPPS and coastal erosion/damage to the SPA.

It is not clear from DAERA how far back a dwelling would be considered 'safe' but this area does not fall within the proposed red line boundary. It may be useful for the applicant to explore with the Planning Department and DAERA if there is scope for an 'off site' replacement.

### Reasons for Refusal

1. The proposal is contrary to paragraphs 3.13 and 6.42 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) in that this area of the coast is known to be at risk from coastal erosion.
2. The proposal is contrary to paragraph 6.176 of the Strategic Planning Policy Statement for Northern Ireland and Policy NH1 of Planning Policy Statement 2, Natural Heritage, in that the site lies adjacent to a proposed Special Protection Area / Ramsar Site (Carlingford Lough extension) and it has not been demonstrated that the proposal will not have a likely significant effect on the protected habitat which supports terns.
3. The proposal is contrary to Policies CTY1 and CTY3 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the overall size of the proposed replacement dwelling would have a visual impact significantly greater than the existing building and the design of the replacement dwelling is not of a high quality appropriate to its rural setting and does not have regard to local distinctiveness.
4. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the design of the proposed building is inappropriate for the site and its locality and therefore would not visually integrate into the surrounding landscape.

<b>Case Officer Signature</b>	
<b>Date</b>	
<b>Appointed Officer Signature</b>	
<b>Date</b>	

### Appendix 1 Survey photographs

The pictures in the appendix are shown in order as they were taken along the coast, the first pictures were taken at point X moving towards point -.

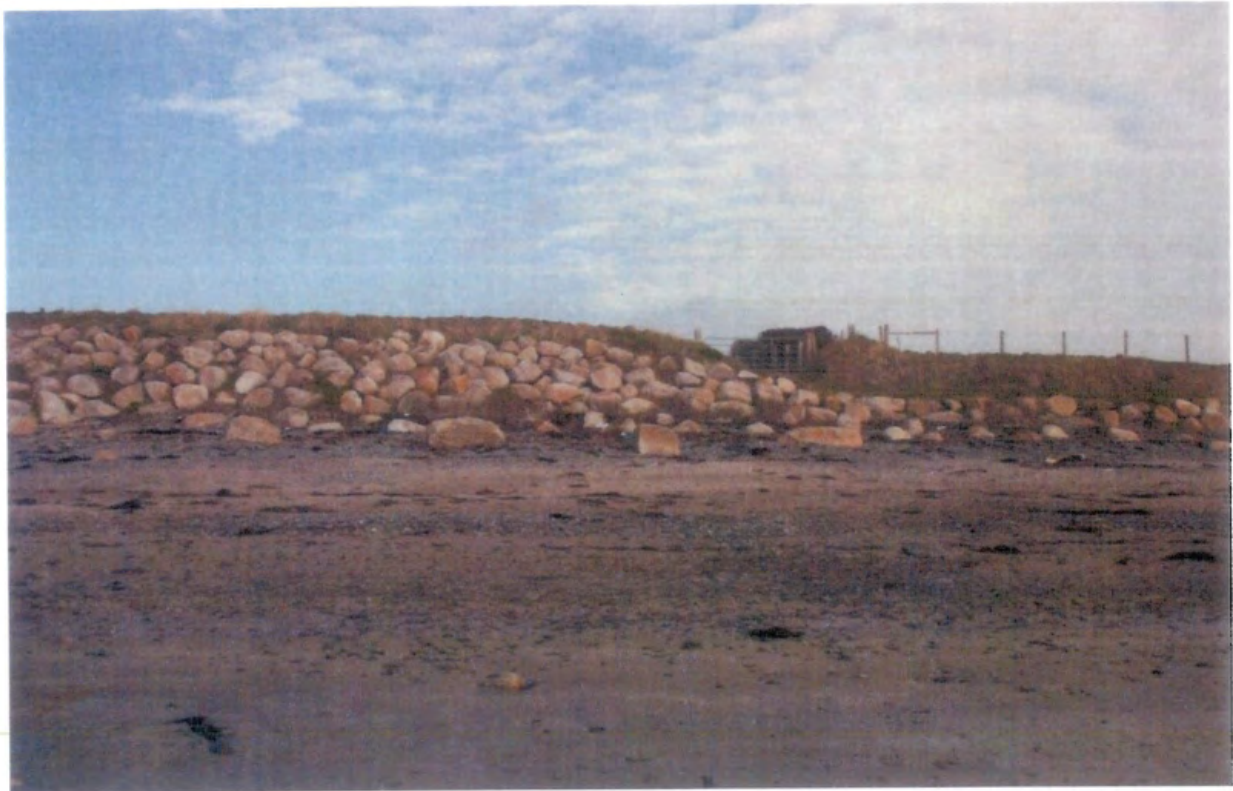




















































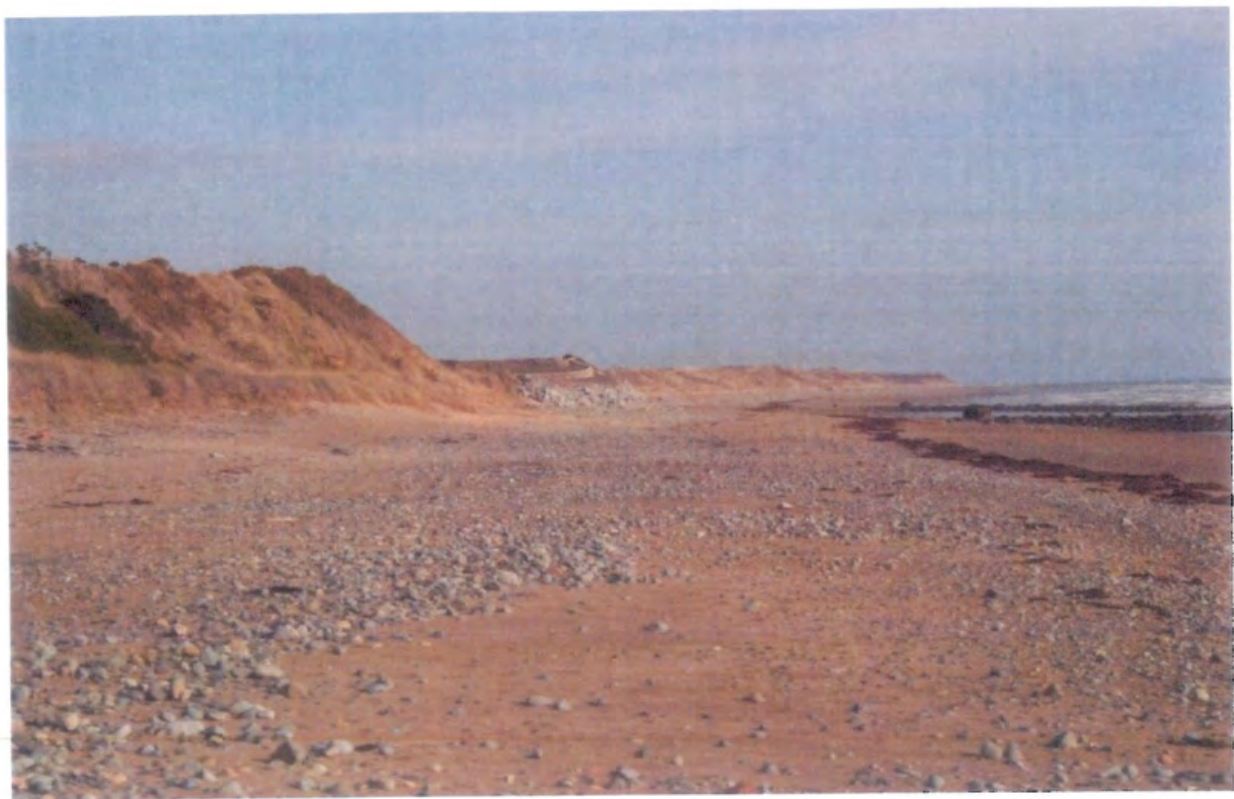






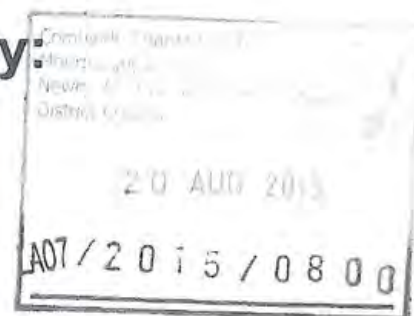








# Coastal Protection Study: Windmill Road Cranfield, Co Down



## DOCUMENT CONTROL SHEET

Client	PONSA Ltd					
Project Title	Coastal Protection Study – Windmill Road, Cranfield, Co Down					
Document Title	Draft Final Report					
Document No.	IBE0939/v01					
This Document Comprises	DCS	TOC	Text	List of Tables	List of Figures	No. of Appendices
	1	1	25	6	17	0

Rev.	Status	Author(s)	Reviewed By	Approved By	Office of Origin	Issue Date
01	Draft Final	AKB	DH	AKB	Belfast	12 Aug 2014



## TABLE OF CONTENTS

1	INTRODUCTION.....	2
2	HISTORICAL ANALYSIS.....	4
3	COASTAL DATA AND ANALYSIS.....	6
3.1	BATHYMETRY.....	6
3.2	TIDAL HEIGHTS AND EXTREME WATER LEVELS.....	8
3.3	OFFSHORE WAVE AND WIND DATA.....	9
3.4	JOINT PROBABILITY.....	11
4	HYDRODYNAMIC MODELLING.....	14
4.1	GENERAL.....	14
4.2	MODEL BATHYMETRY.....	14
4.3	WAVE TRANSFORMATION MODEL.....	17
4.4	WAVE MODELLING PROCEDURE.....	18
4.5	MORPHOLOGICAL BEACH RESPONSE MODELLING.....	21
5	SHORE PROTECTION.....	23
5.1	FORM OF PROTECTION WORKS.....	23
5.2	DESIGN OF ROCK REVETMENT.....	23
5.3	IMPACT OF WORKS ON COASTAL PROCESSES.....	24
6	CONCLUSIONS.....	25

## 1 INTRODUCTION

The Windmill Road frontage at Cranfield is located to the north east of Cranfield Point on the Irish Sea coast immediately to the east of the entrance to Carlingford Lough as shown in Figure 1.1.



**Figure 1.1** Location of Windmill Road frontage at Cranfield

Residential properties are located along the landward side of Windmill Road with gardens and amenity areas on the top of the cliffs between the road and the beach. During the storms of January and February 2014 the cliff at the back of the beach in front of Windmill Road receded resulting in a loss of site area and the cutting of access from individual housing plots to the beach.

Several of the owners of the properties at Windmill Road are concerned about coastal erosion along their property boundaries and commissioned RPS to undertake detailed model studies and a design for suitable coast protection works along a section of about 160 metres of the frontage. The site is located between two existing rock wall protection works on a section of the beach shown by the red line in Figure 1.2





**Figure 1.2** Location of proposed protection works site at Windmill Road

The study required an historical review of erosion at Windmill Road, the assessment of the inshore wave climate and the impact of storm surges on the wave heights, the beach response to storm events and the design of possible protection works to the cliffs. The impact of sea level rise due to climate change was also included in the study.

## 2 HISTORICAL ANALYSIS

Historical six inch county series maps of the Cranfield area were examined to see if there had been significant changes to the shoreline in this area over the past 150 years. Sections of the 1st, 3rd and 4th editions of the County Series maps (1829 - 1835, 1857 - 1935 and 1901 - 1957) were obtained from the NIEA web site. As can be seen from Figures 2.1 to 2.3 they indicate that there has been no substantial change in the location of the shoreline in this area over the past 150 years.

The analysis indicates that while erosion along this frontage does occur from time to time it is driven by severe storm events rather than being a continual on going process. Thus it is likely that material eroded from these cliffs is not a significant contributor to the sediment budget in this region.



Figure 2.1 Shoreline shown in 1st edition (1829-1835) of 6 inch County Series map



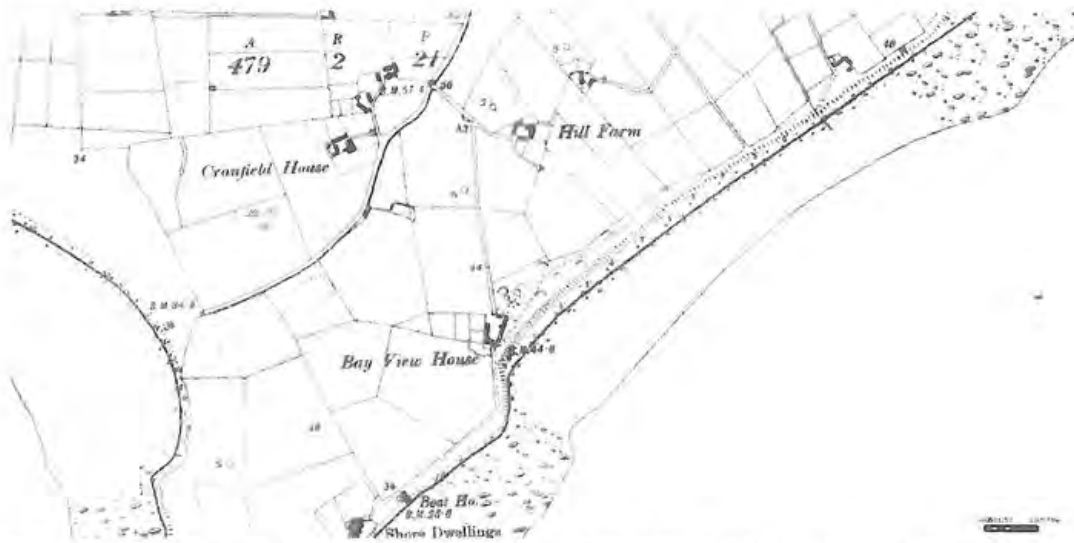


Figure 2.2 Shoreline shown in 3rd edition (1857-1932) of 6 inch County Series map



Figure 2.3 Shoreline shown in 4th edition (1901-1957) of 6 inch County Series map

### 3 COASTAL DATA AND ANALYSIS

#### 3.1 BATHYMETRY

RPS as part of the Irish Coastal Protection Strategy Study (ICPSS), undertaken for the Irish Office of Public Works, collected all the various hydrographic survey and chart data around the coast of Ireland and in the Irish Sea. This information together with a detailed beach survey, Figure 3.1, has been used to develop a computational model of the North Irish Sea. The extent of the bathymetry used in the North Irish Sea model is shown in Figure 3.2.



Figure 3.1 Detailed beach survey along frontage at Windmill Road



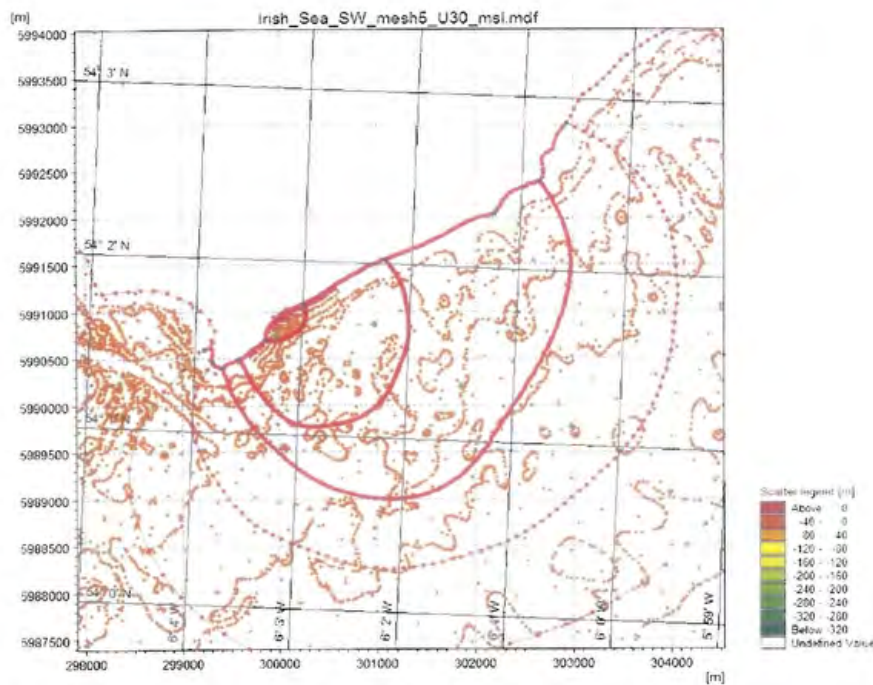
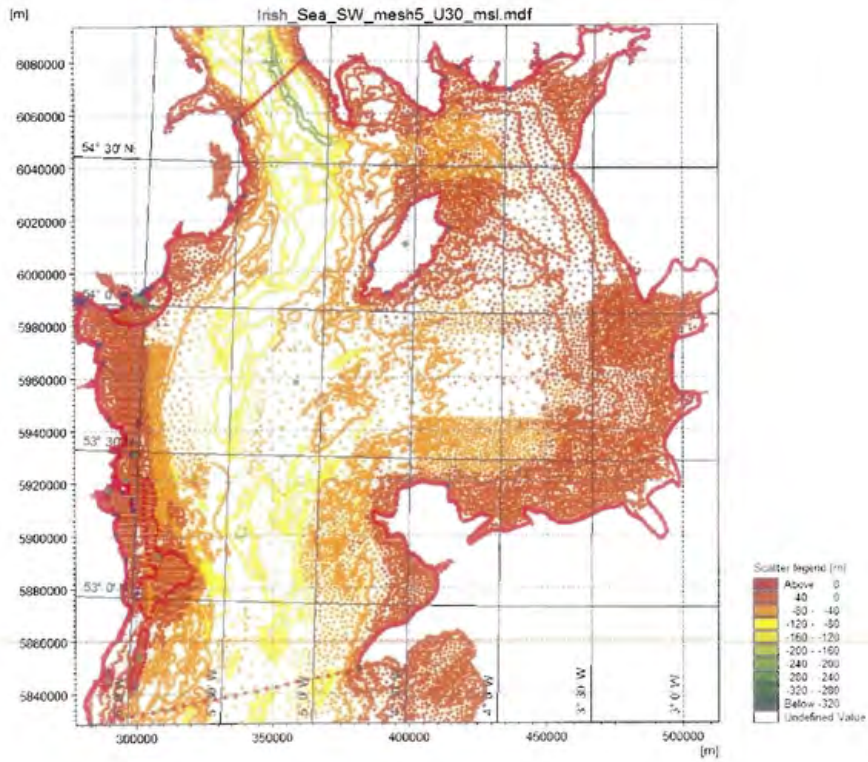


Figure 3.2 Extent of bathymetry of North Irish Sea model (upper diagram) and close up of area around Cranfield (lower diagram)

### 3.2 TIDAL HEIGHTS AND EXTREME WATER LEVELS

The tidal levels for Cranfield, based on UK Admiralty data, are shown in Table 3.1. MSL at Cranfield is approximately 0.13 metres below Ordnance Datum, Belfast.

	Chart Datum	OD
Highest Astronomical Tide	5.1	1.97
Mean High Water Springs	4.8	1.67
Mean High Water Neaps	4.3	1.17
Mean High Water Springs	1.8	-1.33
Mean High Water Neaps	0.2	-2.93
Lowest Astronomical Tide	0.0	-3.13

**Table 3.1 Tidal heights at Cranfield based on UK Admiralty data**

Storm surges increase the water levels above the predicted tidal levels due to the combinations of low barometric pressure and wind shear and set up. As part of the Irish Coastal Protection Strategy Study (ICPSS), undertaken by RPS for the Office of Public Works (OPW), an extreme value analysis of water levels around the coast of Ireland was conducted. One of the data point in this analysis was close to Cranfield and the levels from this ICPSS data point (NE\_1) has been used in this study. The extreme water levels to MSL for various return periods are shown in Table 3.2.

Return Period N (years)	High Water Level -
	MSL
2	3.07
5	3.20
10	3.30
20	3.40
50	3.53
100	3.63
200	3.73
1000	3.96

**Table 3.2 Extreme water levels at Cranfield, levels to MSL**

The storms of January and February 2014 occurred at times of high astronomical tides with the storm surges occurring around the time of high water. Analysis of data from the UK National Tide Gauge network recorders at Bangor, Co Down and Port Erin, Isle of Man



showed that the surge during the storm event in early January had values of 0.92 and 0.85 metres at Bangor and Port Erin respectively. This indicates that the top water level at Cranfield during the January event was about +3.0m to MSL.

The impact of climate change on future sea levels was assessed using data from the Irish Office of Public Work recommendations and reference to the climate change prediction in the Hadley Centre's UKCP09 which is the document used by the Environment Agency in Great Britain. The UKCP09 document gives predicted sea level rises over the 1990 value at Cranfield by 2100 of between 0.45 and 0.61 metres for 50% value of the high emission scenario and 95% percentile value of the medium emission scenario respectively. The Irish Office of Public Works suggests that the most likely value for the rise in sea levels due to climate change by 2100 is 0.5m above current sea levels. It will be seen that the predicated value given by the OPW and UKCP09 are broadly similar and a value of 0.5m sea level rise has been used in this study. It should be noted that this figure is based on data assessed in 2009 and is likely to be revised in the next recommendation from the IPCC which is due next year.

### 3.3 OFFSHORE WAVE AND WIND DATA

The waves which approach Cranfield during storms from the north east to south east sector are generated by the winds blowing across the Irish Sea. With storm from the southerly sector the waves result from a combination of waves which enter the southern Irish Sea plus the wind wave generation in the Irish Sea itself.

Wind speeds for wave generation were taken from the UK Met Office's extreme winds speed analysis across the UK prepared for BS CP3 and subsequently for BS EN 1991. The wind speeds were adjusted for over water values and for the duration required to fully develop the waves over the particular length of wave generation fetch. The analysis produced the combinations of wind speeds ( $m/s^2$ ) and storm directions for the various return period events shown in Table 3.3.

Storm Direction	RP yrs 1 in 1	RP yrs 1 in 2	RP yrs 1 in 5	RP yrs 1 in 10	RP yrs 1 in 20	RP yrs 1 in 50	RP yrs 1 in 100	RP yrs 1 in 200
45	15.22	16.34	17.82	18.94	20.06	21.44	22.65	23.77
60	15.22	16.34	17.82	18.94	20.06	21.44	22.65	23.77
75	15.38	16.51	18.00	19.13	20.26	21.66	22.88	24.01
90	15.22	16.34	17.82	18.94	20.06	21.44	22.65	23.77
105	14.86	15.95	17.39	18.48	19.57	20.93	22.11	23.20
120	14.86	15.95	17.39	18.48	19.57	20.93	22.11	23.20
135	16.00	17.18	18.73	19.91	21.08	22.54	23.81	24.99
150	16.63	17.86	19.47	20.69	21.92	23.43	24.75	25.98
165	16.84	18.08	19.71	20.95	22.19	23.72	25.06	26.29
180	17.22	18.48	20.15	21.42	22.68	24.25	25.62	26.89
195	18.16	19.50	21.26	22.60	23.93	25.58	27.03	28.36
210	18.92	20.31	22.15	23.54	24.93	26.65	28.15	29.54

**Table 3.3 Wind speed (m/s<sup>2</sup>) for the various storm directions and return periods**

The offshore wave data for the waves approaching the southern boundary of the north Irish Sea model during storms was derived from a statistical analysis of wave data taken from the European Centre for Medium Range Weather Forecasts (ECMWF) European Waters Wave model for the years December 1996 to March 2014 for a point at 52.5° N, 5.5°W.

The analysis produced the combinations of wave heights and wave periods for the various storm directions and return period events shown in Table 3.4.

Significant Wave Height Hm0 [m]								
Storm Direction	RP yrs 1 in 1	RP yrs 1 in 2	RP yrs 1 in 5	RP yrs 1 in 10	RP yrs 1 in 20	RP yrs 1 in 50	RP yrs 1 in 100	RP yrs 1 in 200
135	2.731	3.190	3.784	4.228	4.669	5.252	5.694	6.135
150	3.323	3.752	4.295	4.696	5.088	5.601	5.985	6.366
165	3.915	4.313	4.806	5.164	5.508	5.951	6.277	6.597
180	4.507	4.875	5.317	5.632	5.927	6.300	6.568	6.828
195	4.372	4.746	5.206	5.539	5.858	6.268	6.573	6.863
210	4.238	4.618	5.096	5.446	5.789	6.235	6.579	6.899

Spectral Peak Wave Period Tp [s]								
Storm Direction	RP yrs 1 in 1	RP yrs 1 in 2	RP yrs 1 in 5	RP yrs 1 in 10	RP yrs 1 in 20	RP yrs 1 in 50	RP yrs 1 in 100	RP yrs 1 in 200
135	6.941	7.501	8.170	8.636	9.075	9.625	10.022	10.403
150	7.656	8.135	8.704	9.102	9.474	9.940	10.275	10.597
165	8.310	8.723	9.207	9.544	9.857	10.245	10.522	10.788
180	8.916	9.273	9.685	9.967	10.225	10.542	10.764	10.975
195	8.782	9.150	9.583	9.885	10.165	10.515	10.768	11.003
210	8.646	9.025	9.481	9.801	10.105	10.488	10.773	11.031

**Table 3.4 Southern boundary wave data for storm directions and return periods**

### 3.4 JOINT PROBABILITY

The height of the waves which can attack the shoreline at Cranfield are strongly influenced by the water depths at the time of the storm. Thus a joint probability analysis of offshore waves and water levels and winds and water levels was undertaken for each storm direction.

The joint probability analysis was undertaken using the procedures and techniques recommended in the DEFRA/EA report FD2308, "Joint Probability: Dependence Mapping and Best Practice". The correlation factors between waves and water levels and winds and water levels used in this study was based on the research and analysis undertaken by RPS for the ICPSS which establish that the correlation factors for waves/winds with water levels along the east coast of Ireland was 0.25 for storms from the north to north east sector, 0.45 for storms from the east sector and 0.6 for storms from the south east and southern sector.

Examples of the output from the Joint Probability Analysis are shown in Figure 3.3 and Table 3.5 for the wind and water levels and in Figure 3.4 and Table 3.6 for the offshore waves and water levels for storms from the 180° direction. It will be seen from these tables that for each return period there are a number of combinations of waves/winds with water levels which would constitute a particular return period event.

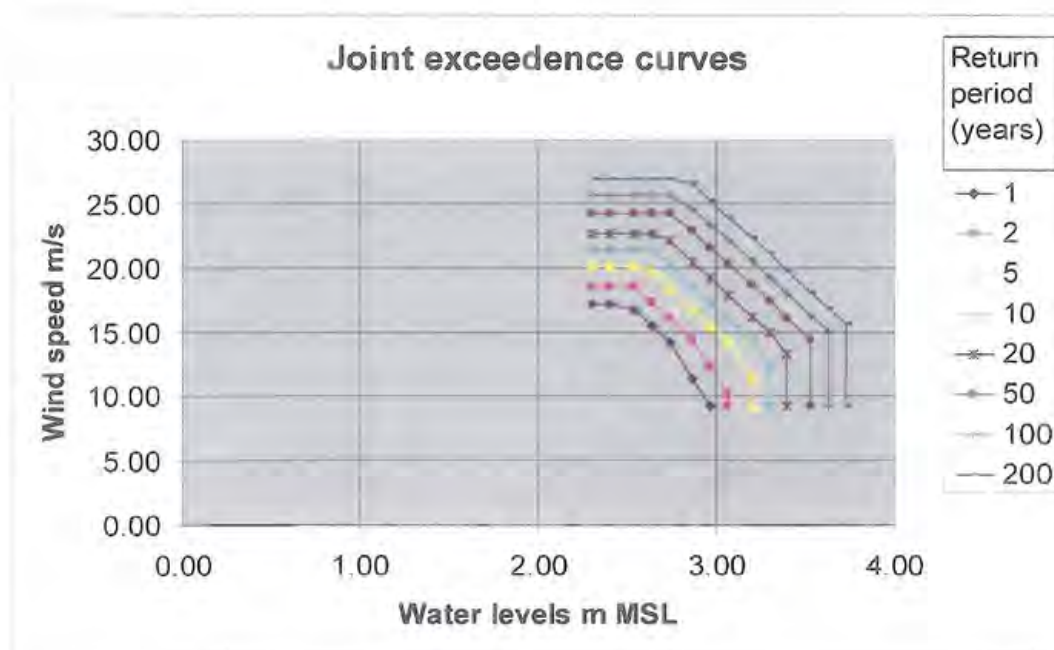


Figure 3.3 Joint Exceedence curves for winds and water levels for storm from 180°



Value of first variable: Present-day sea level off Cranfield (mMSL)	Joint exceedence return period (years)							
	1	2	5	10	20	50	100	200
	Value of second variable:			Wind speed 180 deg				
2.31	17.22	18.48	20.15	21.42	22.68	24.25	25.62	26.89
2.41	17.22	18.48	20.15	21.42	22.68	24.25	25.62	26.89
2.54	16.73	18.48	20.15	21.42	22.68	24.25	25.62	26.89
2.64	15.47	17.30	19.71	21.42	22.68	24.25	25.62	26.89
2.74	14.15	16.03	18.45	20.27	22.10	24.25	25.62	26.89
2.87	11.37	14.36	16.77	18.60	20.43	22.83	24.59	26.50
2.97	9.27	12.31	15.51	17.34	19.16	21.58	23.36	25.20
3.07	#N/A	10.20	14.22	16.07	17.90	20.31	22.14	23.89
3.20	#N/A	#N/A	11.44	14.40	16.23	18.64	20.47	22.30
3.30	#N/A	#N/A	#N/A	12.37	14.96	17.38	19.20	21.03
3.40	#N/A	#N/A	#N/A	#N/A	13.31	16.11	17.94	19.77
3.53	#N/A	#N/A	#N/A	#N/A	#N/A	14.44	16.27	18.09
3.63	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	15.00	16.83
3.73	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	15.56

Table 3.5 Joint exceedence return period values for winds and water levels for storm from 180°

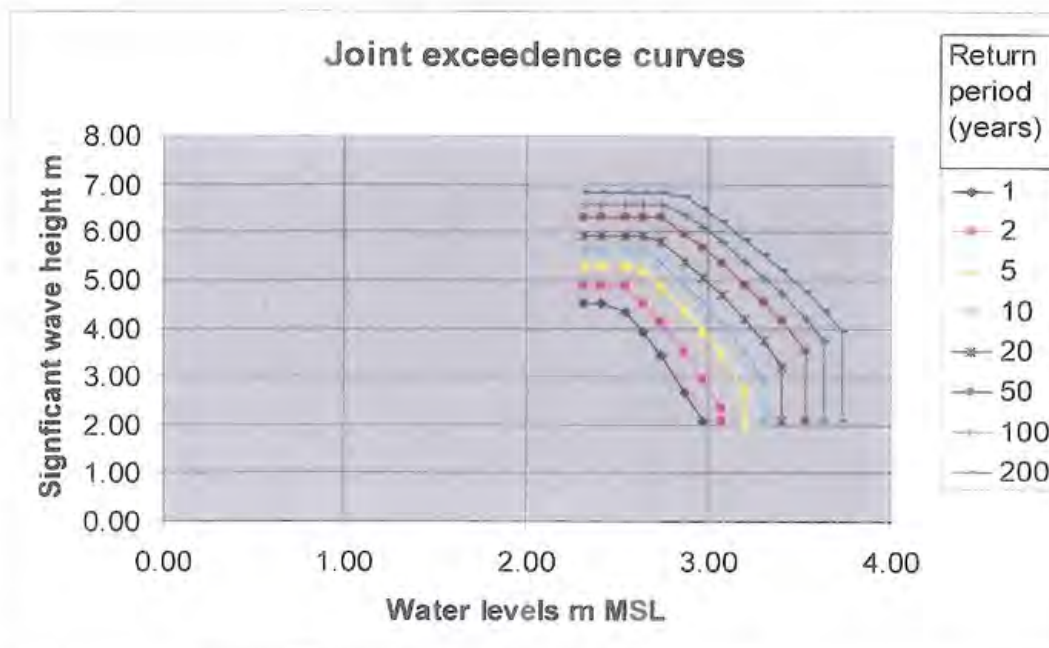


Figure 3.4 Joint Exceedence curves for offshore wave heights and water levels for storm from 180°

Value of first variable: Present-day sea level off Cranfield (mMSL)	Joint exceedence return period (years)							
	1	2	5	10	20	50	100	200
	Value of second variable:			Boundary Wave Height Hm0 180 deg				
2.31	4.51	4.88	5.32	5.63	5.93	6.30	6.57	6.83
2.41	4.51	4.88	5.32	5.63	5.93	6.30	6.57	6.83
2.54	4.35	4.88	5.32	5.63	5.93	6.30	6.57	6.83
2.64	3.93	4.53	5.20	5.63	5.93	6.30	6.57	6.83
2.74	3.45	4.13	4.86	5.35	5.79	6.30	6.57	6.83
2.87	2.68	3.51	4.37	4.91	5.39	5.96	6.37	6.75
2.97	2.09	2.94	3.94	4.54	5.06	5.67	6.09	6.49
3.07	#N/A	2.35	3.47	4.15	4.71	5.36	5.80	6.21
3.20	#N/A	#N/A	2.70	3.53	4.19	4.92	5.40	5.84
3.30	#N/A	#N/A	#N/A	2.96	3.74	4.55	5.07	5.54
3.40	#N/A	#N/A	#N/A	#N/A	3.21	4.16	4.72	5.21
3.53	#N/A	#N/A	#N/A	#N/A	#N/A	3.54	4.21	4.76
3.63	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	3.75	4.38
3.73	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	3.96

**Table 3.6 Joint exceedence return period values for wave heights and water levels for storm from 180°**

The water levels, wind speed and offshore wave conditions during the 2014 January event were examined using data from the water level analysis given in section 3.3 and the analysis of the wave and wind data from the European Centre for Medium-range Weather Forecast (ECMWF) data base. The Joint probability analysis indicated that at Cranfield the storm in early January 2014 had a joint return period between 1 in 25 and 1 in 50 years.

## 4 HYDRODYNAMIC MODELLING

### 4.1 GENERAL

Computational modelling techniques were used to examine the storm wave climate at the beach at Cranfield. The modelling was undertaken using RPS's in-house suite of MIKE coastal process modelling software. This software was developed at the Danish Hydraulics Institute and is considered as state of the art for the simulations of the coastal physical environment. Use was also made of the US Army Corps model SBEACH for the morphological modelling of the beach in response to the storms.

### 4.2 MODEL BATHYMETRY

The simulation of the storm conditions at Cranfield was undertaken using a model of the northern part of the Irish Sea. The model was built using flexible mesh technology to allow for a very fine resolution to be used around the site area while a coarser spacing could be employed in areas of the model remote from the approaches to Cranfield the beach.

The extent of the model bathymetry is shown in Figure 4.1 with the area around the approaches to Cranfield shown in more detail on Figures 4.2a and 4.2b. The grid spacing in the model varied from a fine 5m spacing around the beach area to 2 kilometres in the outer part of the model.

It will be seen from the model that the bathymetry of the area immediately to seaward of the beach at Windmill Road, Cranfield is fairly complex with rocks and shoals significantly affecting the waves which can approach the site.



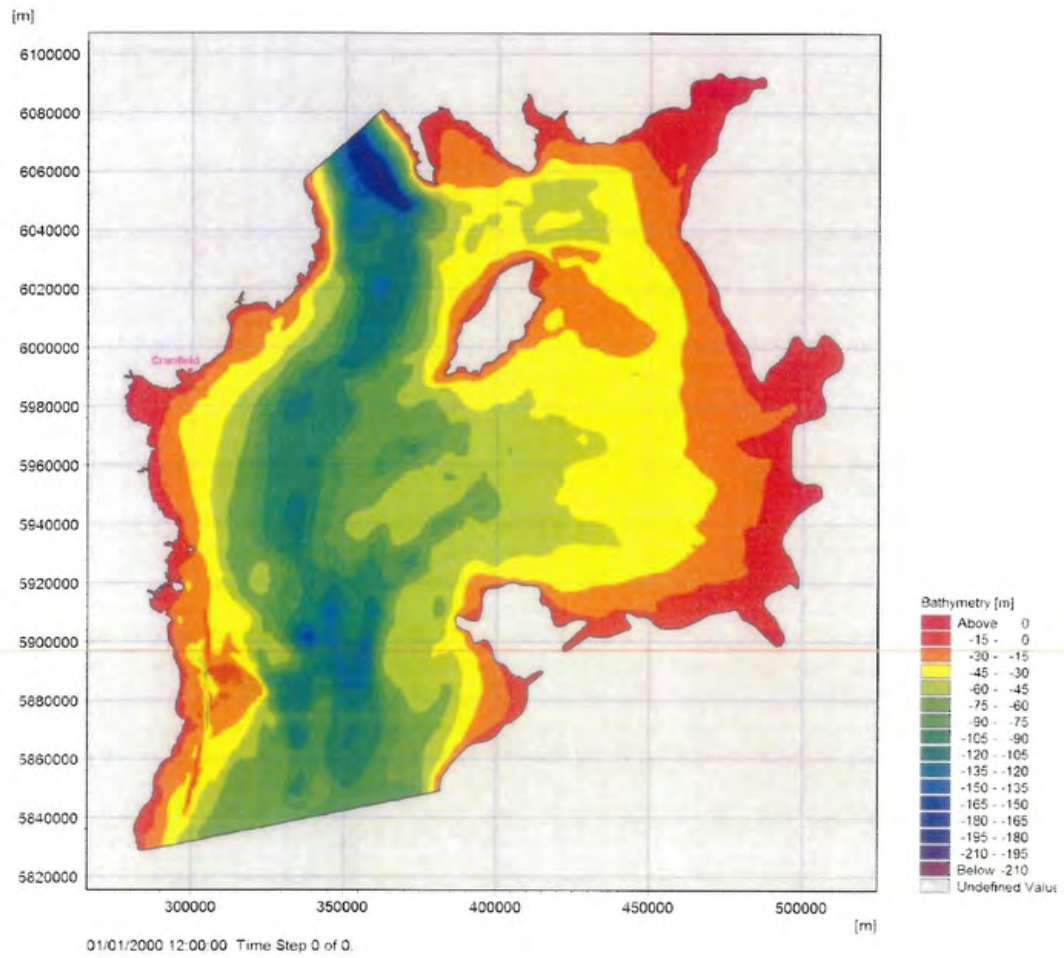


Figure 4.1 Bathymetry of model of North Irish Sea

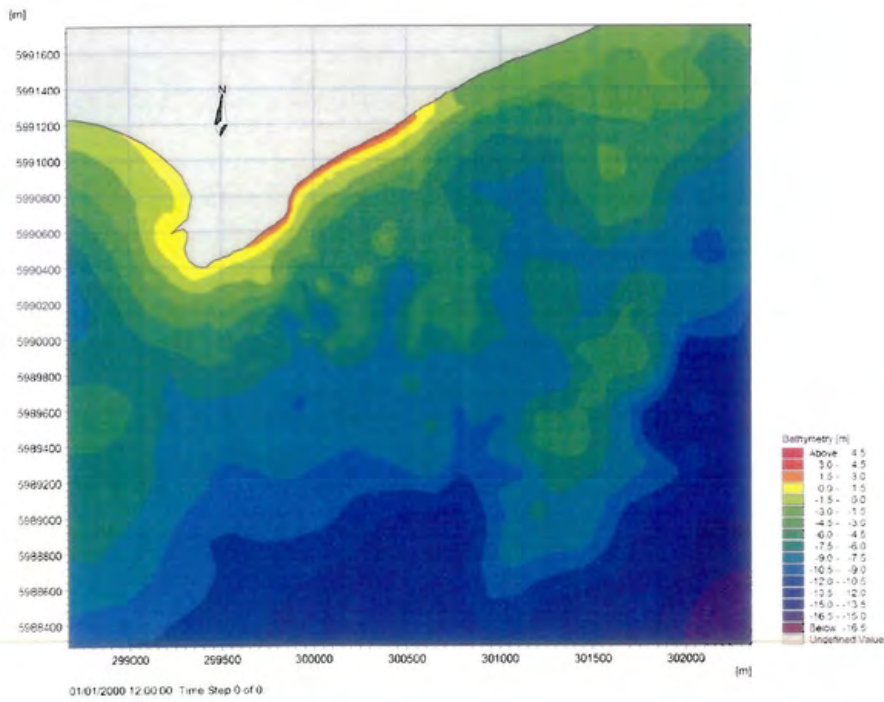


Figure 4.2 Model bathymetry of the approaches to Windmill Road frontage

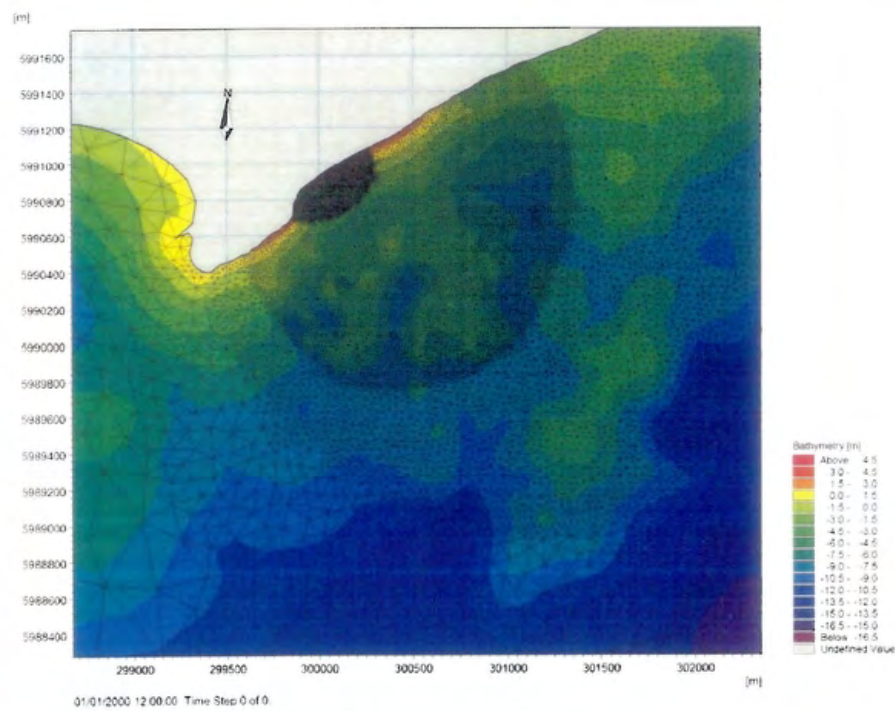


Figure 4.3 Model mesh of the approaches to Windmill Road frontage

### 4.3 WAVE TRANSFORMATION MODEL

#### MIKE 21 Spectral Wave (SW)

The modelling of the wave transformation from the offshore boundary of the North Irish Sea model to the inshore study site was undertaken using the MIKE 21 Spectral Wave (SW) model which is a new generation spectral wind-wave model based on unstructured meshes. The model simulates the growth, decay and transformation of wind-generated waves and swells in offshore and coastal areas.

MIKE 21 SW accounts for the following physical phenomena:

- Wave growth by wind action
- Non-linear wave-wave interaction
- Dissipation due to white-capping
- Dissipation due to bottom friction
- Dissipation due to depth-induced wave breaking
- Refraction and shoaling due to depth variations
- Diffraction
- Wave-current interaction
- Effect of time-varying depth and flooding and drying

The discretisation of the governing equation in geographical and spectral is performed using a cell-centred finite volume method. In the geographical domain, an unstructured mesh technique is used. The time integration is performed using a fractional step approach where a multi-sequence explicit method is applied for the propagation of wave action.

The MIKE 21 SW includes two different formulations:

- Directional decoupled parametric formulation
- Fully spectral formulation

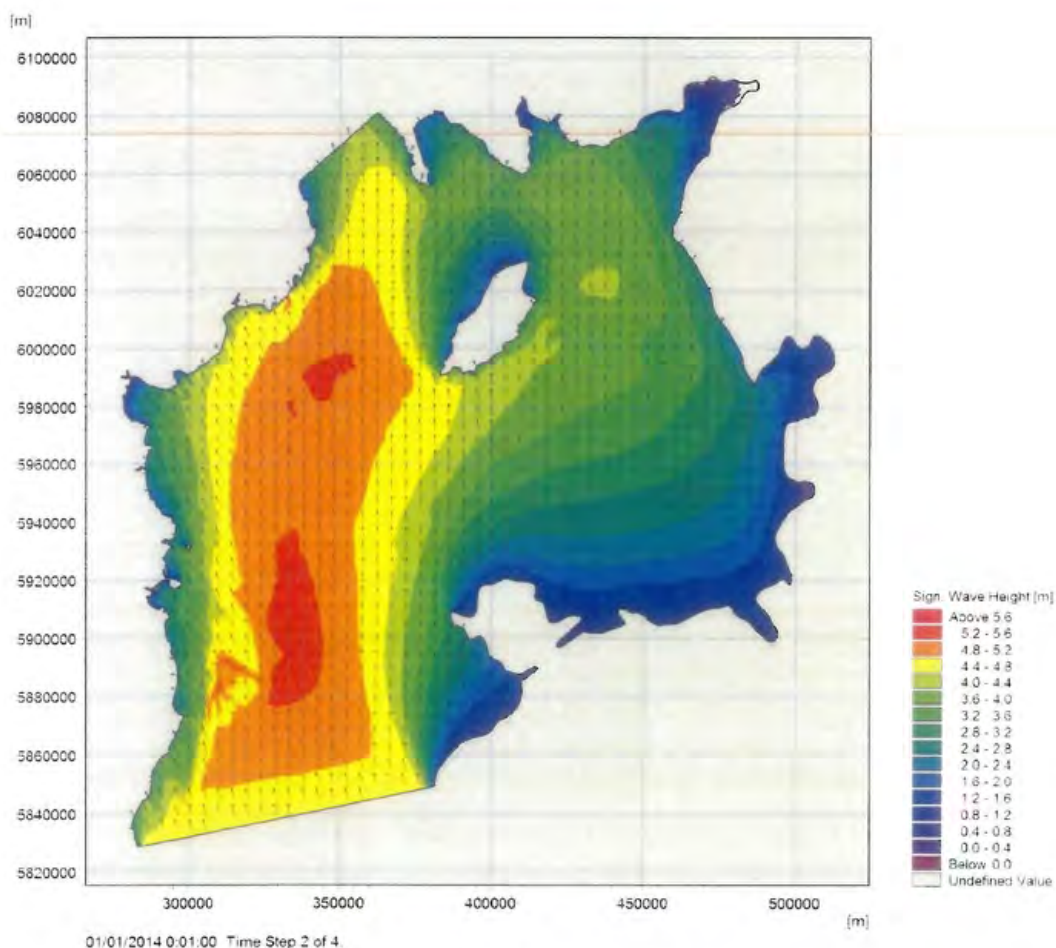
The directional decoupled parametric formulation is based on a parameterization of the wave action conservation equation. The parameterization is made in the frequency domain by introducing the zeroth and first moment of the wave action spectrum as dependent variables following Holthuijsen (1989).



### 4.4 WAVE MODELLING PROCEDURE

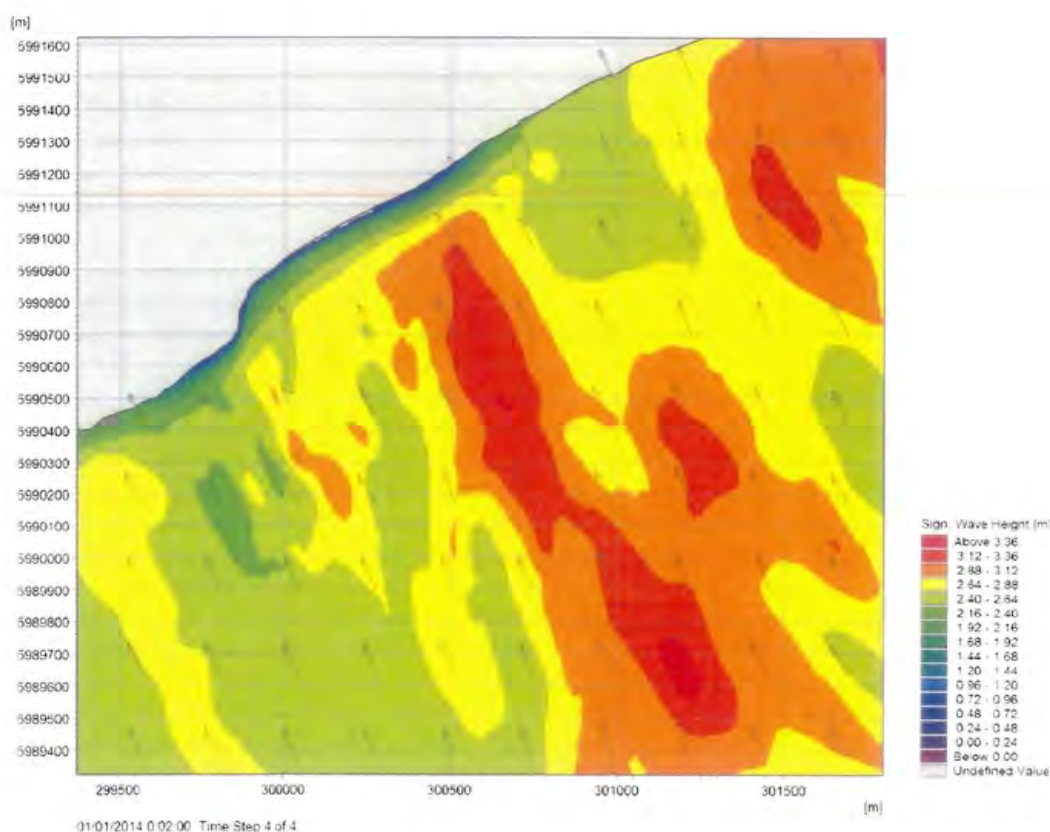
The design standard for coastal flood and protection works is a 1 in 200 year joint probability event. Thus the wave transformation simulations were undertaken for each 15° storm direction from 45° to 210° using 5 combinations of waves and water levels each having a joint probability of 1 in 200 years.

A typical example of the graphic output from one of these model simulations is shown in Figure 4.4 which shows the significant wave height and the mean wave direction of the waves during a 1 in 200 year event for a storm direction of 165° at a water level of +3.3 m MSL. It can be seen that the wave heights to seaward of the beach at Cranfield will have a significant wave height in excess of 4 metres.



**Figure 4.4 Significant wave height and mean wave direction during a 1 in 200 year joint probability event from 165° at a water level of 3.3 metres MSL**

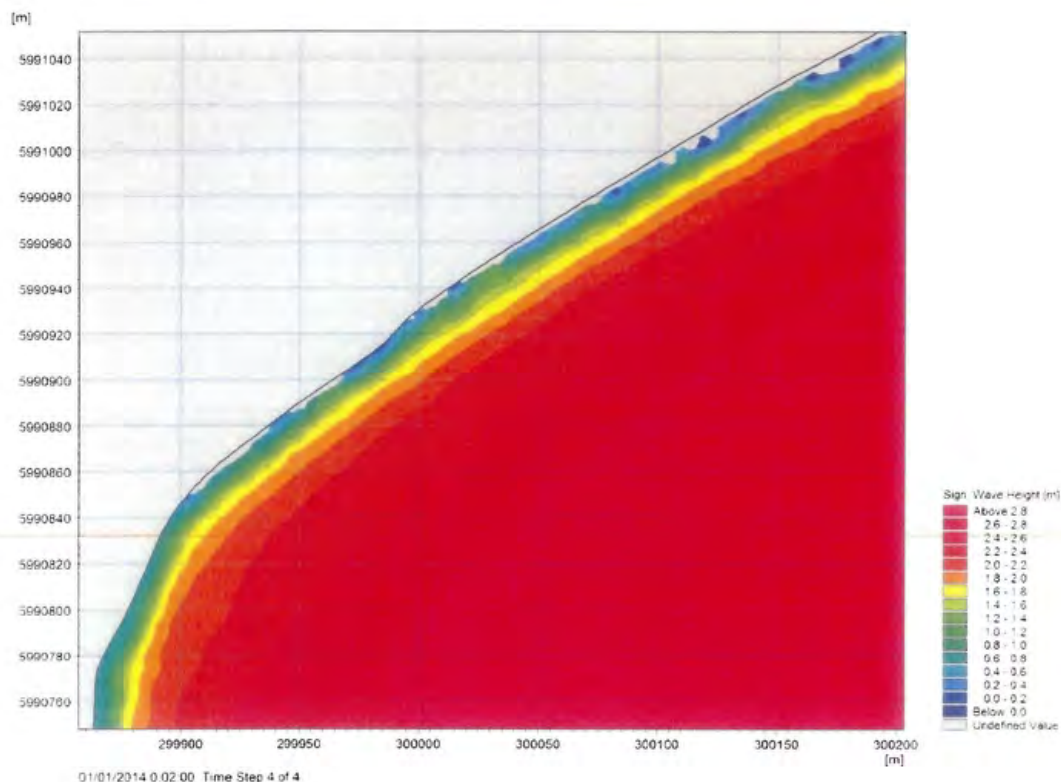
Some 60 wave transformation simulations were undertaken to cover the range of storm directions and water level conditions for the 1 in 200 year joint probability events. The results from these 60 simulations were examined to establish which events produced the largest waves that could attack the proposed coast protection works at the Windmill Road frontage. It was found that southerly storms produced the most arduous conditions at the beach at Windmill Road, Cranfield, thus storms from this 180° direction were also simulated with the effect of 0.5 metre sea level rise included in the simulations. Due to the restricted water depth at the beach it was found that the largest waves occurred with the highest water levels rather than with events where the offshore waves were greater but the water levels were lower.



**Figure 4.5 Significant wave height and mean wave direction at the approaches to Windmill Road beach during a 1 in 200 year joint probability event from 180° at a water level of 3.73 metres MSL**

Figure 4.5 shows the significant wave height and mean wave directions of the waves around the approaches to the Windmill Road beach area for the most arduous conditions with water

levels at +3.73m MSL. It will be seen that while the waves in the nearshore area are over 3m in height they break before reaching the upper part of the beach.



**Figure 4.6** Significant wave heights at the Windmill Road beach during a 1 in 200 year joint probability event from 180° at a water level of 3.73 metres MSL

Figure 4.6 shows this effect in more detail where it can be seen that there is a rapid reduction in the waves due to depth restriction as the waves approach the upper beach area. Thus any change in the beach levels can be very important in determining the size of the waves that can attack the proposed coast protection works at the back of the beach.



#### 4.5 MORPHOLOGICAL BEACH RESPONSE MODELLING

The morphological modelling of the beach storm drawdown was undertaken using the US Army Corps SBEACH model. SBEACH is an empirically based numerical model for simulating two-dimensional cross-shore beach change developed by US Army Corps of Engineers. The model was initially formulated using data from prototype-scale laboratory experiments and further developed and verified based on field measurements and sensitivity testing. SBEACH calculates mesoscale beach profile change with emphasis on beach and dune erosion and bar formation and movement. The model was originally developed in the early 1990s and then up rated to include the effects of hard bottoms and seawalls in 1998 and further refined in 2004 with new algorithms for run-up and over wash. The model is extensively used to-day in the US for predicting the response of beaches to storm attack particularly in the state of Florida where their beaches are subject to severe wave attack during the hurricane season.

The model was set up with a 2m grid taken from a typical profile across the beach and nearshore area running from the top of the beach to the -10m contour. The input wave climate was extracted from the wave transformation model simulations. The model was run for a storm duration of 62 hours, i.e. 5 spring tide cycles, including the appropriate storm surge. The hard bottom facility was used to simulate the effects of the proposed revetment as well as simulating the effects of the rocky area that lies to seaward of the beach.

An example of the output from the morphological model simulation is shown in Figure 4.7. The diagram shows the results on the upper part of the beach.



**Figure 4.7** Output from morphological model showing reduction in the upper beach during a 62 hour storm

The morphological simulations showed that the upper beach levels are expected to drop by about 1.6 metres during the design storm with the wave set up increasing water levels in front of the coast protection works by about 300 mm, above the high water levels to seaward of the beach.

The wave heights in the area immediately to seaward of the toe of the coastal protection works derived from the morphological model simulations were similar to those obtained from the wave transformation model for the water depth equivalent to those at the drawn down beach. Thus it was concluded that waves of about 1.75 metres significant wave height could attack the proposed works during the design storm with 2014 sea levels. The design wave heights which can attack the coast protection works are predicted to increase to about 2.1 metres significant wave height with a sea level rise of 0.5 metres.

## 5 SHORE PROTECTION

### 5.1 FORM OF PROTECTION WORKS

For the majority of the time the cliffs at the back of the beach at Windmill Road are not exposed to wave action and it is only the combination of large storm surges and significant offshore wave activity, such as the storm event in January 2014, that results in wave attack on these cliffs. A variety of measures were considered for the protection of the cliffs which included the following.

- Gabion baskets
- Concrete walls
- Revetment either of concrete block or rock armour

Gabions were rejected as the beach material would soon remove the protective coating and the wires would rust and fail. Protective works using concrete walls were also considered to be unsuitable as the walls would increase wave reflection leading to a further reduction in beach levels. Revetments were considered to be the best option with rock armour being preferred as this form of construction is the most effective in absorbing wave energy which reduces the beach draw down under wave action.

### 5.2 DESIGN OF ROCK REVETMENT

The design of the rock armour protection for the proposed revetment was undertaken using the research of Van der Meer and Van Gent for rock armour with shallow water wave attack. The design level of the crest of the revetment was governed by the allowable overtopping which was calculated using the procedures recommended in the EurOtop manual (2007).

The design wave climate for 1 in 200 year joint probability storm with 2014 sea levels was found to be a significant wave height of 1.75 metres with a mean wave period of 7.56 seconds. The wave climate increased to a significant wave height of 2.1 metres with a rise of 0.5 metres due to climate change.

Revetment slopes of both 1 in 1.5 and 1 in 2 were designed for the project. However the 1 in 1.5 slope required a primary rock armour weight of 4.5 Tonnes where as the 1 in 2 slope required a 3 Tonne primary armour weight. RPS experience indicated that it is much more difficult to obtain good quality 4.5 Tonne armour than 3 Tonne armour in Northern Ireland and thus the 1 in 2 slope was adopted for the revetment design. Two layers of 3 Tonne armour would be require to protect the revetment from the design storm with sea level rise



due to climate change while one layer would be sufficient to withstand the design wave climate at the current sea levels. It was decided to design the revetment with a 1 in 2 slope and a single 3 Tonne primary armour layer with the top of the toe at least 1.6 metres below the current beach levels. This would allow a second layer of armour to be added once the timing and amount of sea level rise due to climate change was more accurately established. This was considered to be the most cost effective way to develop the proposed coast protection works.

The revetment is to cover some 160 metres of the frontage and lies between two existing sections of rock wall protection. A further short section of rock protection is required to the south of the main length of the protection works. Details of the proposed protection construction are shown on Drawing IBE0939/01 which accompanies this report.

### 5.3 IMPACT OF WORKS ON COASTAL PROCESSES

The proposed protection works are situated at the cliffs at the back of the beach. The beach levels are such that it is only during major storm events, when the beach becomes drawn down, that waves actually reach the proposed works. Thus the proposed scheme has no effect on the normal tidal, wave or sediment transport regime of the area. Historical analysis shows that the erosion of the cliffs only occurs intermittently and the amount of erosion is insignificant in relation to the ongoing sediment transport of the area. Thus the proposed works will have no significant impact on the normal coastal processes of the area.

Even during storm events the main area of sediment transport is well to seaward of the toe of the revetment and as the revetment itself is energy absorbing, it will not increase the height of the breaking waves to seaward of the shoreline to affect the sediment transport during storms. It is therefore concluded that the proposed revetment protection works at Windmill Road beach will not have a significant impact on the coastal processes of the area.

## 6 CONCLUSIONS

During the storms of January and February 2014 the cliff at the back of the beach in front of Windmill Road receded resulting in a loss of site area and the cutting of access from individual housing plots to the beach. Comparison of historic 6" County Series maps indicates that while erosion along this frontage does occur from time to time it is driven by severe storm events rather than being a continual on going process.

A detailed analysis of the offshore wave and wind climate and the extreme tidal levels indicated that the January 2014 event had a return period of between 1 in 25 to 1 in 50 years. It is important to note that these return periods are based on historic events and do not take any account of possible changes in the climatic conditions due to climate change.

The wave climate at the study site has been simulated under 1 in 200 year joint return period storm conditions using advanced computational modelling techniques. Modelling simulations were also undertaken to assess and quantify the impacts of future sea level change on the inshore wave climate at the site.

The largest waves that can approach the cliffs during a 1 in 200 year joint probability storm were found to have significant wave heights of 1.75 metres with mean wave periods of circa 7.56 seconds with offshore water level of +3.73 metres to MSL. These storm waves draw down the beach and allow the waves to break against the cliff face and result in erosion to this section of the shoreline. The wave heights increase to 2.1 metres significant height when the water levels are increased by 0.5 metres to allow for sea level rise due to climate change.

A stone revetment extending 160 metres along the toe of the cliffs could be constructed to protect the residential property sites from storm induced erosion. In order to protect against the largest waves identified under the 1 in 200 year joint return period conditions the revetment should have a primary armour layer consisting of 3 Tonne armour laid on a slope of 1 in 2. Beneath the primary armour there should be a layer of 300 kg sized stone which in turn is laid on a filter layer of 300mm stone. A geo-textile such as Terram 2000 or similar should be placed between the revetment structure and the face of the cliff to prevent fine material in the cliff migrating through the revetment structure. The crest of the revetment should be above +6.0 metres OD and the toe should be buried 1.6 metres beneath the beach to prevent undermining.

The revetment can be strengthened in the future by placing a second layer of armour on the revetment slope to take account of the increase wave heights at the beach resulting from sea level rise due to climate change.

An assessment has been undertaken of the impact of the proposed revetment on the coastal processes of the area. It was found that the proposed scheme would have no significant impact on the coastal processes around the Cranfield area or indeed further a field.



<b>ITEM NO</b>	20		
<b>APPLIC NO</b>	LA07/2016/0897/F	Full	<b>DATE VALID</b> 6/30/16
<b>COUNCIL OPINION</b>	REFUSAL		
<b>APPLICANT</b>	Mourne Landscapes Ltd 40a School Road Ballymartin Kilkeel	<b>AGENT</b>	Glyn Mitchell Architectural Design 139 Ballinran Road Kilkeel BT34 4JB NA
<b>LOCATION</b>	40a School Road Ballymartin Kilkeel		
<b>PROPOSAL</b>	Retention of existing machinery store and yard for existing landscape business		
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b> <b>SUP Petitions</b>
	0	0	0                      0
			<b>Addresses Signatures</b> <b>Addresses Signatures</b>
			0                      0    0    0

- 1    The proposal is contrary to Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
- 2    The proposal is contrary to paragraphs 6.87 – 6.88 of the Strategic Planning Policy Statement for Northern Ireland and Policy PED2 of Planning Policy Statement 4: Planning and Economic Development, in that it does not meet any of the stated exceptions for economic development in the countryside and there are no exceptional circumstances.
- 3    The proposal is contrary to Policy PED9 of Planning Policy Statement 4: Planning and Economic Development, and Policy FLD3 of Planning Policy Statement 15: Planning and Flood Risk, in that it is located in an area at flood risk and no Drainage Assessment was submitted to demonstrate that the proposal will not cause or exacerbate flooding at the site or elsewhere and that adequate mitigation measures are in place.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** LA07/2016/0897/F

**Date Received:** 30<sup>th</sup> June 2016

**Proposal:** Retention of existing machinery store and yard for existing landscape business

**Location:** 40a School Road, Ballymartin, Killeel.  
The site is located half a mile north of Ballymartin.

**Site Characteristics & Area Characteristics:**

The site contains a relatively new single storey dwelling and its landscaped curtilage. An enclosed yard has been created to the rear of the dwelling where an unauthorised shed has been erected. It is fully clad with black profiled tin with some clear panels in the roof. There is a roller shutter and pedestrian door to the SE gable. Some semi-mature trees have been planted along the NE side to help screen the development. The shed is used as storage for a landscaping business run by the applicant and owner of the house. Plants and other items associated with the business are stored in the surrounding yard. A large wall has been built across the site frontage. The shed is visible in the landscape over the wall, though it benefits from the backdrop of trees to the rear.







The site is located in a rural area approximately half a mile north of Ballymartin. It is unzoned land outside settlement limits on the Banbridge, Newry and Mourne Area Plan 2015 and is within a Site of Local Nature Conservation Importance (SLNCI 156 – Ballymartin Moraine) and the Mournes and Slieve Croob Area of Outstanding Natural Beauty. The area is rural in nature, but has experienced some development pressure for single dwellings. It sits on the coastal plain between the Mourne Mountains and the Irish Sea and the landscape at this point is relatively flat.

#### **Site History:**

The new dwelling was approved under the following applications:

- P/2002/2484/O – Site for dwelling and detached garage – Approved 26.04.2005
- P/2007/0983/RM – Erection of dwelling – Approved 11.06.2008

The dwelling is not built in the location indicated on the approved plans, but has been pulled forward about 20 metres. This has left space for the creation of the yard and shed to the rear of the house. The approved curtilage has also been significantly enlarged to take in the whole field and the access was not built in accordance with the approved plans. An Enforcement case was opened in relation to the access in 2013. A second case was opened in relation to the unauthorised shed and landscaping business in 2015. A warning letter in relation to both breaches was sent in January 2016. The access has now been implemented as approved.

#### **Planning Policies & Material Considerations:**

- The Strategic Planning Policy Statement for Northern Ireland (SPPS)
- Banbridge, Newry & Mourne Area Plan 2015
- PPS3 – Access, Movement & Parking
- DCAN15 – Vehicular Access Standards
- PPS4 – Planning and Economic Development
- PPS15 – Planning and Flood Risk
- PPS21 – Sustainable Development in the Countryside

#### **Consultations:**

TransportNI – No objections.

Environmental Health – No objections.



### **Objections & Representations**

The application was advertised in the *Mourne Observer* on 27<sup>th</sup> July 2016. Four neighbouring dwellings were notified of the proposal on 26<sup>th</sup> July 2016. No third party objections or representations were received.

### **Consideration and Assessment:**

The main issues to be considered are the principle of the business use in the countryside, design and integration of the shed, road safety and impacts on amenity.

Section 45 of the Planning Act (Northern Ireland) 2011 requires the Council to have regard to the local development plan, so far as material to the application, and to any other material considerations. The site is currently within the remit of the Banbridge / Newry & Mourne Area Plan 2015 as the new council has not yet adopted a local development plan. The site is located outside settlement limits on the above Plan, and is unzoned. It is within a Site of Local Nature Conservation Importance (SLNCI 156 – Ballymartin Moraine incorporating Ballyveagh Beg) and the Mournes and Slieve Croob Area of Outstanding Natural Beauty. Appendix 1D of the Plan's Countryside Assessment states that the SLNCI is designated for its geological features as a glacial landform. It is the most complete and best marked example of an interlobate moraine in Northern Ireland. It is likely that the shed was erected without damage to the geological makeup of the landscape and therefore no further consultation with regard to the SLNCI is required. There are no specific policies in the Plan that are relevant to the determination of the application and it directs the decision-maker to regional operational policy.

The site has no permission for business use. The new use would fall within use class B4: Storage or distribution of the Planning (Use Classes) Order (Northern Ireland) 2015. Therefore the SPPS and PPS4 – Planning and Economic Development will be applicable. The SPPS will facilitate economic development proposals in the countryside that are likely to benefit the rural economy and support rural communities, while protecting and enhancing rural character and the environment. In the interests of rural amenity and wider sustainability objectives, the level of new building for economic development purposes outside settlements must be restricted. This is similar to the intent of policy PED2: Economic Development in the Countryside in PPS4 which indicates that new buildings for such uses in the countryside will be strictly controlled. As the SPPS is less prescriptive, the retained policy of PPS4 will be given substantial weight in determining the principle of the proposal in accordance with paragraph 1.12 of the SPPS.

Policy PED2 sets out four circumstances where economic development uses in the countryside will be permitted. As there is no established economic development use at this location, the first two do not apply. It is not a major industrial development and it is not a small community enterprise park on the edge of a settlement as required for a 'small rural project', so the third and fourth bullet points do not apply. The headnote of the policy concludes by stating that "All other proposals for economic development in the countryside will only be permitted in exceptional circumstances". No exceptional circumstances have been advanced in this case. There is no stated need for this proposal that would overcome the strong policy objections to this business use in the countryside. It is contrary to paragraphs 6.87 – 6.88 of the SPPS

and policy PED2 of PPS4 and should be refused. It follows that it is also unacceptable in principle as development in the countryside under policy CTY1 of PPS21.

All proposals for economic development must also be assessed against the general criteria of policy PED9. The proposed use is not incompatible with surrounding land uses and should not harm the amenity of nearby residents through, for example, excess noise. It does not adversely affect features of the natural or built heritage. It is assumed that effluent from the toilet in the shed is disposed of to the house's septic tank. The access and the existing road network can handle any additional vehicular traffic attending the site and there is room to turn vehicles in the rear yard. There is no impact on public rights of way. The enclosed rear yard with access past the dwelling house will help to deter crime. The site layout with the shed to the rear of the dwelling house is acceptable and the design of the building is typical of outbuildings now found across the rural area. Attempts have been made to landscape the site through the planting of mature trees which help to screen the building. Given that it also has a backdrop of trees, the building would not fall foul of the tests for integration and rural character in policies CTY13 and CTY14 of PPS21. However, criterion (d) of policy PED9 requires that it is not located in an area at flood risk and will not cause or exacerbate flooding. The shed has been built within an area at risk from surface water flooding. Under policy FLD3 of PPS15, a Drainage Assessment should have been submitted with the application as there is a history of surface water flooding. This was not done. If the land was raised to reduce flood risk to the shed itself, this could have reduced storage capacity in what was a natural bog area and would therefore have increased the risk of flooding elsewhere. The proposal is therefore contrary to policies PED9 and FLD3 and should be refused on the basis of flood risk.



Following several enforcement warning letters in relation to the provision of the access to the site, TransportNI is now satisfied that the access as approved is in place. The proposal has the potential to intensify the use of the existing access from School Road. Policy AMP2 of PPS3 states that planning permission will only be granted for a development proposal involving intensification of the use of an existing access onto a public road where such access will not prejudice road safety or inconvenience traffic flow. Paragraph 5.16 of Policy AMP2 makes reference to DCAN 15 which sets out the current standards for sightlines. In this case



TransportNI is content that the existing access has adequate visibility and does not require improvement to accommodate additional traffic that may be generated by the proposal.

Policy NH6 of PPS2 applies to development within Areas of Outstanding Natural Beauty. The siting and scale of the proposal will not harm the special character of the AONB and it is satisfactorily screened from public views. The design and materials are acceptable for this local area.

**Recommendation:** Refusal

**Refusal Reasons:**

1. The proposal is contrary to Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
2. The proposal is contrary to paragraphs 6.87 – 6.88 of the Strategic Planning Policy Statement for Northern Ireland and Policy PED2 of Planning Policy Statement 4: Planning and Economic Development, in that it does not meet any of the stated exceptions for economic development in the countryside and there are no exceptional circumstances.
3. The proposal is contrary to Policy PED9 of Planning Policy Statement 4: Planning and Economic Development, and Policy FLD3 of Planning Policy Statement 15: Planning and Flood Risk, in that it is located in an area at flood risk and no Drainage Assessment was submitted to demonstrate that the proposal will not cause or exacerbate flooding at the site or elsewhere and that adequate mitigation measures are in place.

**Case Officer Signature:**

**Date:**

**Appointed Officer Signature:**

**Date:**



<b>ITEM NO</b>	<b>24</b>		
<b>APPLIC NO</b>	LA07/2016/1206/O	Outline	<b>DATE VALID</b> 9/13/16
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>		
<b>APPLICANT</b>	Thresa McNulty c/o Agent	<b>AGENT</b>	Architectural Design Service 20 Upper Burren Road Burren Warrenpoint BT34 3PT 07725917253
<b>LOCATION</b>	50m south of 30 Upper Burren Road Burren Warrenpoint BT34 3PT		
<b>PROPOSAL</b>	Erection of replacement dwelling and detached garage for 4 upper Burren Road to be replaced off site on land 50m south of 30 Upper Burren Road, Warrenpoint		
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b> <b>SUP Petitions</b>
	0	0	0                      0
			<b>Addresses Signatures</b> <b>Addresses Signatures</b>
			0                      0    0    0

- 1 The proposal is contrary to the Strategic Planning Policy Statement for Northern Ireland and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
- 2 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that a new building on this site would be a prominent feature in the landscape; the proposed site lacks long established natural boundaries and is unable to provide a suitable degree of enclosure for the building to integrate into the landscape; and the proposed building relies primarily on the use of new landscaping for integration.
- 3 The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that a new dwelling on this site would, if permitted, be unduly prominent in the landscape and would therefore result in a detrimental change to further erode the rural character of the countryside.



**Application Reference:** LA07/2016/1206/O

**Date Received:** 13<sup>th</sup> September 2016

**Proposal:** This application is for the erection of an off-site replacement dwelling and garage. The dwelling to be replaced is located at 4 Upper Burren Road while the proposed replacement site is located 50m south of 30 Upper Burren Road.

**Location:** 50m south of 30 Upper Burren Road, Burren, Warrenpoint, BT34 3PT

**Site Characteristics & Area Characteristics:**

The building to be replaced is a vernacular style dwelling located at number 4 Upper Burren Road. The building is a small single storey dwelling of linear plan and a narrow gable depth. The walls are natural stone with lime render and have been whitewashed. There are two chimneys on the ridge line, one at each gable end, and there is a small lean to structure to the right hand side. The curtilage of the dwelling house is very restricted. The dwelling is within the settlement development limits of Warrenpoint/Burren as designated in the Banbridge, Newry and Mourne Area Plan 2015.



Figure 1 - Dwelling to be Replaced

The proposal involves the replacement of the existing vernacular dwelling with a new off-site dwelling which would be located 50m south of number 30 Upper Burren Road. The proposed site is an existing agricultural field that rises gently from the roadside boundary towards the middle of the field before sloping down towards the Mill Dam to the rear. The boundaries of the site are defined by a mixture of



hedgerow and post and wire fence to the front; a timer fence to the right hand side; and a hedgerow to the left hand side; while the boundary to the rear is undefined.

The site is in a rural area that is classified as open countryside. It is also within a Site of Local Nature Conservation Importance; a Local Landscape Policy Area; the Mourne Area of Outstanding Natural Beauty and an area of constraint on mineral developments as designated in the Banbridge, Newry and Mourne Area Plan 2015.



Image 2 - Application site

**Site History:**

- P/1995/0186 – Site for dwelling – No. 4 Upper Burren Road, Milltown, Warrenpoint – Permission granted 06.04.1995
- P/2012/0820/F – Erection of a Dwelling – Adjacent to No.4 Upper Burren Road, Milltown, Warrenpoint – Permission granted 06.02.2013
- P/2013/0541/O – Site for dwelling and detached garage - 60 m north of 37 Upper Burren Road, Warrenpoint – Permission granted 09.09.2014



### **Planning Policies & Material Considerations:**

- The Regional Development Strategy (RDS) 2035 The Banbridge, Newry and Mourne Area Plan 2015;
- The Strategic Planning Policy Statement for Northern Ireland;
- Planning Policy Statement 2 – Natural Heritage;
- Planning Policy Statement 3 – Access, Movement and Parking;
- Planning Policy Statement 21 – Sustainable Development in the Countryside.

### **Consultations:**

Transport NI –	No objections in principal.
NI Water –	Generic response.
NIEA WMU –	No specific comment to make - refers to standard conditions and informatives.

### **Objections & Representations**

29 neighbour notification letters were issued and the application was advertised in the local press the week beginning 26<sup>th</sup> September 2016. No objections or representations have been received to date.

### **Consideration and Assessment:**

Outline planning permission is sought for the proposed erection of an off-site replacement dwelling. Section 45 of the Planning Act (Northern Ireland) 2011 requires the Council to have regard to the local development plan, so far as material to the application, and to any other material considerations. The site is currently within the remit of the Banbridge, Newry & Mourne Area Plan 2015. There are no specific policies in the Plan relevant to the determination of the application and it directs the decision-maker to the operational policies of the SPPS, PPS 2, PPS 3 and PPS21.

### **Principle of Development**

The aim of the SPPS with regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities consistent with the RDS. Both the SPPS and PPS 21 define the countryside as land lying outside of settlement limits as identified in development plans. The existing dwelling subject of replacement is located within the settlement limits of Warrenpoint/Burren as designated in the above plan. The proposal is to replace the existing dwelling with a new off-site dwelling on a site that is in the open countryside and outside of settlement limits.

Policy CTY1 of PPS 21 states there are a range of types of development which in principle are considered to be acceptable in the countryside and that will contribute to sustainable development. This includes replacement dwellings in accordance with

Policy CTY 3. However as this proposal relates to an existing dwelling within settlement limits it is considered to be contrary to the Strategic Planning Policy Statement for Northern Ireland and Policy CTY1 of Planning Policy Statement 21 – Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.

### Ribbon Development

Policy CTY 8 of PPS 21 states planning permission will be refused for a building which creates or adds to a ribbon of development. As you can see from the satellite image below, the proposed off-site replacement dwelling is to be located on land 50m south of number 30 Upper Burren Road. There are two agricultural fields, one either side of number 30. I am content that the location of the proposed off-site replacement would not add to or create a ribbon of development.



Figure 3 - Satellite Image of Application Site

### Integration and Design

Policy CTY 13 of PPS 21 states planning permission will be granted for a building in the countryside where it can be visually integrated into the surrounding landscape and is of an appropriate design. As you can see from the image below, the proposed site lacks long established natural boundaries and is unable to provide a suitable degree of enclosure for a new dwelling to integrate into the landscape. A new dwelling on this site would be a prominent feature in the landscape and would rely primarily on the use of new landscaping for integration. While planting could be used to define the curtilage of the site it would take time to establish and mature in order



to provide a suitable degree of enclosure. The proposal is therefore considered contrary to criteria (a), (b) and (c) of Policy CTY 13.



There is a lack of long established natural boundaries

Figure 4 - Google Image of the site of the new replacement dwelling.

### **Rural Character**

Policy CTY 14 of PPS 21 states planning permission will be granted for a building in the countryside where it does not cause a detrimental change to, or further erode the rural character of an area. As detailed above, a new dwelling on this site would be a prominent feature in the landscape due to the topography of the land and the lack of long established natural boundaries. The proposal is therefore considered to be contrary to criteria (a) Policy CTY 14.

### **Development Relying on Non-Mains Sewage**

Policy CTY 16 states planning permission will only be granted for development relying on non mains sewerage where the applicant can demonstrate that this will not create or add to a pollution problem. The applicant has indicated that fowl sewage will be disposed with by septic tank. No details have been provided at outline stage however I am satisfied the site could accommodate a septic tank and soak-away subject to obtaining consent to discharge from NIEA.

### **Access, Movement and parking**

Policy AMP2 of PPS3 states that planning permission will only be granted for a development proposal involving direct access onto a public road where such access will not prejudice road safety. Paragraph 5.16 of Policy AMP2 makes reference to DCAN 15 which sets out the current standards for sightlines that will be applied to a new access onto a public road. TransportNI were consulted and have no objections in principal subject to a scale plan and accurate site survey being submitted as part of any reserved matters application showing the access to be constructed and other requirements in accordance with the RS1 form.

### **Recommendation:**

Refusal



**Refusal Reasons:**

1. The proposal is contrary to the Strategic Planning Policy Statement for Northern Ireland and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
  
2. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that a new building on this site would be a prominent feature in the landscape; the proposed site lacks long established natural boundaries and is unable to provide a suitable degree of enclosure for the building to integrate into the landscape; and the proposed building relies primarily on the use of new landscaping for integration.
  
3. The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that a new dwelling on this site would, if permitted, be unduly prominent in the landscape and would therefore result in a detrimental change to further erode the rural character of the countryside.

**Case Officer Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Authorised Officer Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**ITEM NO** 27  
**APPLIC NO** P/2012/0069/F **Full DATE VALID** 1/23/12  
**COUNCIL OPINION** REFUSAL  
**APPLICANT** Terry O Hanlon 84 Maytown Road Newry BT35 7NF  
**AGENT** John Ross MacMahon 111n Camlough Road Newry BT35 7EE 07966828669

**LOCATION** Approximately 400 metres south south west of No.78 Maytown Road Enagh Bessbrook Newry

**PROPOSAL** Erection of 225kw wind turbine.

<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>
	0	1	0	0
			<b>Addresses</b>	<b>Signatures</b>
			0	0 0 0

- 1 The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
- 2 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).
- 3 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that development would, if permitted, result in an unacceptable adverse impact on biodiversity and nature conservation interests.
- 4 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that development would, if permitted, result in an unacceptable adverse impact on visual amenity and landscape character.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**

District Council

## RECONSIDERATION

**Application Reference:** P/2012/0069/F

**Date Received:** 23.01.2012

**Proposal:** Erection of 225kw wind turbine.

**Location:** Approximately 400 metres south south west of No.78 Maytown Road  
Enagh

**Site History:**

n/a

**Planning Policies & Material Considerations:**

*The Strategic Planning Policy Statement (SPPS)*  
*The Banbridge/Newry and Mourne Area Plan 2015*  
*Planning Policy Statement 3*  
*Planning Policy Statement 21*  
*PPS 18*  
*PPS 2*

**Consultations:**

**EH-** no objections- non associated residential property approx. 310 metres away.

**NIEA-** serious nature conservation concerns- refusal PPS 2

**Belfast Int Airport-** no objections

**JRC-** no objections

**TransportNI-** no objections

**NATS-** no objections

**Arqiva-** no objections

**Ofcom**

**UK DIO-** no objections

**Objections & Representations**



*No. of neighbours notified=2/2/12*

*Advertised= 04.03.2014*

*No. of representations received, letter of support from applicant on neighbouring turbine P/2013/0016/f*

### **Consideration and Assessment:**

*The proposal being within the countryside area is subject to the policies of Planning Policy Statement 21. Proposals for renewable development are to be considered under PPS 18 which is supported by the Best Practise Guidance and Wind Energy Development in NI's landscapes.*

*The proposal is for a single wind turbine with a hub height of 30 metres and blade radius of 27 metres. The proposal will have an overall height of 43.5 metres to blade tip.*

*The proposal falls within the Landscape character area 68- Carrigtuke Hills*

*The area is characterised by a generally open landscape, particularly on the uplands. The lower slopes are more enclosed due to hedgerows and valley landform. The overall sensitivity to wind energy development is medium with the lower and more prominent slopes to the north and east of the LCA.*

*The proposal is sited within a lower lying drumlin area of the landscape. The proposal when viewed from the surrounding road network is accompanied by a high degree of enclosure afforded by the surrounding landform. However, the turbine is to be sited on the top of a drumlin. Given the proposed skyline position the turbine will be a prominent feature in the landscape particularly when viewed from the Kingsmill Road, Maytown Road and Shrewsbury Road.*

*Given the siting it is considered that the proposal development will have an unacceptable impact on the visual amenity of the landscape character.*

*Having inspected the site and surroundings the proposal will not result in an accumulation of existing wind turbines. However, it is noted that there is a pending application P/2013/0016/F neighbouring the site.*

*Public safety, human health, or residential amenity*

*For wind farm developments the best practice separation distance of 10 times rotor diameter to occupied property should comfortably satisfy safety requirements. For smaller turbines a lesser fall over distance of the height of the turbine to the tip of the blade plus 10% is applied as a safe separation distance, in this case a distance of 48 metres will be applied. There are no occupied properties within 300 metres of the proposal.*

*Having applied the shadow flicker test to the proposal, it is considered that the potential for shadow flicker to cause problems to neighbouring properties to be rare. There are no properties within 270 metres and 130 degrees either side of north.*

*A noise assessment was submitted as part of the application, Environmental Health having assessed the findings has responded with standard conditions. The Best Practise Guidance states that a distance of 10 times the rotor diameter will generally*

be applied. The closest non associated residential property is over 300 metres from the proposal. Having done a search of the surrounding lands there is no pending or committed development that would need to be included in the above assessments.

*Impact on biodiversity, nature conservation or built heritage interests.*

*Planning Policy Statement 2 sets out the Department's current planning policies on nature conservation that are taken into account when considering any development of land. With wind turbine development there can be potentially serious implications for biodiversity. Having consulted with NIEA, NED they have serious nature conservation concerns and the proposal is contrary to Policy and the Habitats Regs. The agent submitted a bat survey to the Area office at the time which indicated bat activity representing four species in the vicinity of the turbine including a number of Leislers Passes. Leisler Bats tend to forage and commute around turbine blade height and are considered to be at high risk of collision if present and at high risk at the population level from turbines. From NIEA records it is considered there is a moderate level of activity of Bats in this area. NIEA considers a moderate level of activity from a species which is at high risk from the negative effects of wind turbines to be of serious nature conservation concern. Having considered the built heritage there is no monuments or listed buildings within the sphere of influence.*

*The Council having consulted the relevant bodies is content that no part of the development will give rise to unacceptable electromagnetic interference to communications installations; radar or air traffic control systems; emergency services communications; or other telecommunication system.*

*Access to the proposal is gain via an existing vehicular access to the said lands. TransportNI have been consulted as part of the application and returned with no objections.*

*Having considered all of the above I am of the opinion to recommend refusal.*

### **Recommendation:**

#### **Refusal**

*The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that*

*development would, if permitted, result in an unacceptable adverse impact on biodiversity and nature conservation interests.*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that development would, if permitted, result in an unacceptable adverse impact on visual amenity and landscape character.*

.....

.....

.....

.....



**ITEM NO** 28  
**APPLIC NO** P/2014/0070/RM Reserved M **DATE VALID** 1/15/14  
**COUNCIL OPINION** REFUSAL  
**APPLICANT** Patrick and Mairead Green 60 **AGENT** Martin Bailie 44  
 Carquillan Bavan Road  
 Hilltown Mayobridge  
 Newry Newry  
 BT34 5HQ BT34 2HS  
 30851910

**LOCATION** Immediately North of 54 Drumreagh Road  
 Rostrevor

**PROPOSAL** Erection of a Dwelling and Garage

REPRESENTATIONS	OBJ Letters		SUP Letters		OBJ Petitions		SUP Petitions	
	0	1	0	0	Addresses	Signatures	Addresses	Signatures
					0	0	0	0

- 1 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the proposed building would be a prominent feature in the landscape, the design of the proposed building is inappropriate for the site and its locality and the proposed building fails to blend with the landform, and therefore would not visually integrate into the surrounding landscape.
- 2 The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the building would, if permitted, be unduly prominent in the landscape and would therefore result in a detrimental change to the rural character of the countryside.
- 3 The proposal is contrary to paragraph 6.187 of the Strategic Planning Policy Statement for Northern Ireland and Policy NH6 of Planning Policy Statement 2, Natural Heritage, in that the site lies in a designated Area of Outstanding Natural Beauty and the development is of an inappropriate design, size and scale for the locality and is out of keeping with local architectural styles and patterns and the special character of the Mourne AONB.
- 4 The proposal is contrary to Policy AMP2 'Access to Public Roads' of Planning Policy Statement 3, Access, Movement and Parking, in that it would, if permitted, prejudice the safety and convenience of road users since visibility from the proposed access cannot be provided to an adequate standard.
- 5 Having notified the applicant under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that amendments to the design of the dwelling, landscaping and access to the site are required to allow the planning authority to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.



Newry, Mourne and Down District  
Council  
Planning Office  
O'Hagan House  
Monaghan Row  
Newry  
BT35 8DJ

### Delegated Application

Development Management Officer Report		
<b>Case Officer:</b> Gareth Kerr		
<b>Application ID:</b> P/2014/0070/RM		<b>Target Date:</b>
<b>Proposal:</b> Erection of a Dwelling and Garage		<b>Location:</b> Immediately North of 54 Drumreagh Road, Rostrevor
<b>Applicant Name and Address:</b> Patrick and Mairead Green 60 Carquillan Hilltown Newry BT34 5HQ		<b>Agent Name and Address:</b> Martin Bailie 44 Bavan Road Mayobridge Newry BT34 2HS
<b>Date of last Neighbour Notification:</b>		3rd February 2014
<b>Date of Press Advertisement:</b>		7th February 2014
<b>ES Requested:</b> No		
<b>Consultations:</b>		
<b>Consultation Type</b>	<b>Consultee</b>	<b>Response</b>
Non-statutory	TransportNI	Amended access position required
Non-statutory	Environmental Health	Standard informatives
<b>Representations:</b>		
Letters of Support	None Received	
Letters of Objection	None Received	
Petitions and signatures	No Petitions Received	
Number of Petitions of Objection and signatures	No Petitions Received	
<b>Summary of Issues:</b>		
<p>The applicant seeks approval of Reserved Matters for a dwelling and garage on a farm. The main block of the dwelling measures 21m x 10.1m, 6 metres high at the front but over 8 metres high at the rear (caused by approximately 3 metres of under build). There is a sunroom at the southern gable which extends the overall length of the dwelling to 25.8m. A large balcony is proposed at the rear of the property. This is to be erected on 2.2 metre pillars. A double garage is proposed to the side / rear of the house.</p> <p>The submitted plans do not identify the finished floor levels of the house or garage. By failing to submit this information, the applicant has failed to indicate how it is proposed to address the change in levels through the site, and no details of ancillary works (such as retaining walls, side slopes to driveway) have been provided. The submitted plans indicate that new planting is proposed however specific details have not been provided (location, size / girth / height at time of planting).</p>		



## Site Visit Report

### Site Location Plan:



**Date of Site Visit:** 20th May 2014

### Characteristics of the Site and Area

The site is located to the immediate north of 54 Drumreagh Road, outside Rostrevor in the Mournes Area of Outstanding Natural Beauty. No 54 is a derelict dwelling and there are a number of small outbuildings adjacent to the house which combine to form a small farm grouping. The site is a rectangular plot cut from a larger field to the north of the farm grouping. The plot runs adjacent to the roadside and it is 40 metres deep and 60 metres across the road frontage. The field is set below the level of the road, and the terrain falls sharply from south east to north west. There is a line of trees along the south western boundary. There is a grass verge and a ditch along the road edge. The north western boundary is undefined on the ground however it is located in close proximity to the western boundary of the field. There is a low hedge and a belt of scrub / bushes along the north eastern field boundary. Because the site lies behind a ditch and it is set beneath the level of Drumreagh Road, there are limited views into and through the site from Drumreagh Road. The critical viewpoints are located on Lower Knockbarragh Road, approx. 300 metres to the north west, when travelling south on that road. The site is elevated above these viewpoints, although it would be seen in the context of a mountain to the immediate rear. The site is accessed via a field gate at the south eastern corner of the field.

The site is located in a scenic rural area that is characterised by a dispersed pattern of settlement, approximately 2 miles north of Rostrevor. It is outside settlement limits on the Banbridge / Newry and Mourne Area Plan 2015 and within the Mournes and Slieve Croob Area of Outstanding Natural Beauty. The terrain is undulating, and Drumreagh Road rises from south to north, along the western slopes of Leckan More and Slieve Roosley. Dwellings are typically well spaced out, but are commonly found immediately adjacent to the roadsides, cut into the hillsides. There are a number of smaller clusters of dwellings on the southern approach on Drumreagh Road, however the area is more isolated in the vicinity of this site.



### **Planning Assessment of Policy and Other Material Considerations**

The application has been assessed under the Strategic Planning Policy Statement for Northern Ireland (SPPS), the Banbridge / Newry & Mourne Area Plan 2015, PPS2 – Natural Heritage, PPS3 – Access, Movement and Parking, DCAN15 – Vehicular Access Standards, and PPS21 – Sustainable Development in the Countryside. The Building on Tradition Sustainable Design Guide will also be considered.

#### **Planning History**

Outline planning permission has been granted for a dwelling on this site. Permission was granted on the basis of a farm dwelling, in accordance with Policy CTY 10 of PPS 21. This permission was subject to a number of conditions, including ridge height (6 metres above finished floor level), under build (not to exceed 0.45 metres) and details of existing and proposed levels.

The principle of the development is established through the granting of outline planning permission on 19th February 2013. Matters reserved for approval included: siting, design, external appearance, means of access and landscaping.

#### **The Banbridge / Newry & Mourne Area Plan 2015**

Section 45 of the Planning Act (Northern Ireland) 2011 requires the Council to have regard to the local development plan, so far as material to the application, and to any other material considerations. The site is currently within the remit of the Banbridge / Newry & Mourne Area Plan 2015 as the new council has not yet adopted a local development plan. The site is located outside settlement limits on the above Plan, and is unzoned. It is within the Mournes and Slieve Croob Area of Outstanding Natural Beauty. There are no specific policies in the Plan that are relevant to the determination of the application and it directs the decision-maker to the operational policies of the SPPS and the retained PPS21. Impact on the AONB will be considered under PPS2.

#### **Siting and Design and External Appearance**

Paragraph 6.73 of the SPPS confirms that *"Dwellings on farms must also comply with LDP policies regarding integration and rural character."* In the absence of an adopted LDP these considerations must be assessed under policies CTY13 and CTY14 of PPS21.

The dwelling has not been designed to respect the site's natural contours. The front elevation is elongated and its length is excessive. Chimneys protrude from the middle of the roof. The gable depth is also considered excessive particularly considering the change in levels in the site. The excessive gable depth means that substantial, unacceptable, under build structures are proposed at the rear. The depth of the underbuild, together with the substantial balcony / decked structure at the rear, will give the house an unduly prominent appearance, when viewed from Lower Knockbarragh Road. It will be over 2 metres in excess of the 0.45m underbuild restriction imposed at outline stage.

The previous planning authority (the DOE) wrote to the applicant on 13th March 2014 to outline these concerns. This was followed with a telephone call on the same date, reinforcing this letter but also pointing out that Roads Service has requested the access position to be moved as per their comments under the outline planning application. Further advice on how the condition could be complied with was provided in letters dated 14th April 2014 and 22nd May 2014 and an email dated 30th June 2014. It was suggested that the dwelling is re-designed to respect the topography of the site. This could include turning it 90° and using a split level approach where separate elements of the building are stepped down the hill. This is common on sloping sites in the area including No. 54 Drumreagh Road immediately south of the site. By having a series of floor levels appropriate to the surrounding ground level, a more traditional rural form can be achieved. It was indicated that it was possible that lesser weight could be given to the concerns regarding underbuilding if a redesigned scheme applying the above points was submitted. However, the agent has steadfastly refused to change the original plans or to take on board the advice given.

The application was put on hold pending a meeting with Margaret Ritchie MP. Following this meeting, a site survey was provided but the agent again refused to change the plans and provided a doctor's letter to



state that the applicants' son had a medical condition whereby it would be beneficial for him to live in the countryside. Medical evidence must be assessed under policy CTY6. Notwithstanding the fact that the medical condition referred to is relatively common and that many people have no difficulty living in an urban setting with it, the fact remains that the planning authority has no issue with the principle of a dwelling on this site which has been previously approved. The key issue in the reserved matters application is design and impact on rural character. No evidence has been produced to demonstrate that the applicants' son has to live in a single level house, or that a split level dwelling would cause him genuine hardship. There is therefore no reason why the design of the dwelling cannot be amended to both comply with design guidelines and cater for the applicants' son's needs. If there is an issue with steps, the agent should not have designed a dwelling with 14 steps just outside the back door to reach ground level. As the medical evidence presented does not meet the policy test of demonstrating genuine hardship if the design has to be changed, no weight can be given to this evidence in the determination of the application.

The dwelling as proposed would be unduly prominent in the landscape from Lower Knockbarragh Road and its suburban style design and wide gable depth would be an incongruous feature from the above location and also from Drumreagh Road. The house type is clearly inappropriate for the site and its locality and it fails to blend with the existing landform as required by policy CTY13. The proposal is therefore contrary to policies CTY13 and CTY14. It is also contrary to policy NH6 of PPS2 as the scale and design of the building does not respect the local architectural style and special character of the Mourne AONB. As the agent has repeatedly been made aware of the design deficiencies and has refused to change the plans, the application must be refused.

#### Access

Policy AMP2 of PPS3 states that planning permission will only be granted for a development proposal involving direct access onto a public road where such access will not prejudice road safety. Paragraph 5.16 of Policy AMP2 makes reference to DCAN 15 which sets out the current standards for sightlines that will be applied to a new access onto a public road. The access to the site is not in the position identified as being suitable at the time of the outline planning application. In its current form, the proposal has not complied with the guidance set out in DCAN 15 or PPS 3. The agent was asked to amend this on several occasions and has failed to do so. Therefore the application should be refused based on prejudice to road safety and failure to submit material information.

#### Landscaping

Landscaping details have been referred to on the site layout map. However, specifications and planting schedules have not been provided. The applicant has failed to identify species / location / size / girth / height at the time of planting. On the basis of the information presented, landscaping details are not adequate. Again, this information was requested and has not been forthcoming.

#### Representations

No objections or representations were received.

#### Case Officer Recommendation – Refusal

#### Neighbour Notification Checked

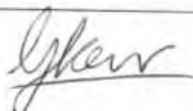
Yes

#### Summary of Recommendation

A dwelling on the site is acceptable in principle having regard to the planning history, however, the proposed design with wide gable depth and excessive length and underbuilding is unacceptable in this rural area and AONB. The agent was given numerous opportunities to change the design and has failed to do so. He has also failed to demonstrate a safe access. The medical evidence submitted cannot be given determining weight.

**Reasons for Refusal:**

1. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the proposed building would be a prominent feature in the landscape, the design of the proposed building is inappropriate for the site and its locality and the proposed building fails to blend with the landform, and therefore would not visually integrate into the surrounding landscape.
2. The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the building would, if permitted, be unduly prominent in the landscape and would therefore result in a detrimental change to the rural character of the countryside.
3. The proposal is contrary to paragraph 6.187 of the Strategic Planning Policy Statement for Northern Ireland and Policy NH6 of Planning Policy Statement 2, Natural Heritage, in that the site lies in a designated Area of Outstanding Natural Beauty and the development is of an inappropriate design, size and scale for the locality and is out of keeping with local architectural styles and patterns and the special character of the Mourne AONB.
4. The proposal is contrary to Policy AMP2 'Access to Public Roads' of Planning Policy Statement 3, Access, Movement and Parking, in that it would, if permitted, prejudice the safety and convenience of road users since visibility from the proposed access cannot be provided to an adequate standard.
5. Having notified the applicant under Article 7 (4) of the Planning (General Development) Order (Northern Ireland) 1993 that amendments to the design of the dwelling, landscaping and access to the site are required to allow the planning authority to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.

**Case Officer Signature:****Date:**

3/2/16

**Appointed Officer Signature:****Date:**

4/2/16



<b>ITEM NO</b>	<b>D1</b>			
<b>APPLIC NO</b>	P/2010/1065/F	Full	<b>DATE VALID</b>	8/31/10
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>			
<b>APPLICANT</b>	Ms Martina Magill 7 Glen Road Newry BT34 1QS		<b>AGENT</b>	Greenpark Energy Systems Ltd 111n Camlough Road Newry BT35 7EE 02830837502
<b>LOCATION</b>	300m from Newtown Road, Belleek, accessed by lane adjacent to 3 Newtown Road, Belleek			
<b>PROPOSAL</b>	Erection of Wind turbine for electricity production - 30 metre high			
<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>
	0	0	0	0
			<b>Addresses</b>	<b>Signatures</b>
			0	0
			<b>Addresses</b>	<b>Signatures</b>
			0	0
<b>1</b>	The proposal is contrary to the Strategic Planning Policy Statement and Policy RE1 of the Department's Planning Policy Statement 18 'Renewable Energy' and associated Best Practice Guidance in that the applicant has failed to demonstrate that the development will not create an adverse impact on the habitat of protected species or the amenity of nearby residents by reason of noise nuisance and shadow flicker.			
<b>2</b>	Having notified the applicant under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that further details were required by NIEA and Environmental Health to make a full assessment which were required to allow the Council to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.			
<b>3</b>	The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).			
<b>4</b>	4. The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.			



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** P/2010/1065/F

**Date Received:** 31.08.2010

**Proposal:** Erection of Wind turbine for electricity production - 30 metre high

**Location:** The proposal is located approximately 380metres west from the settlement of Belleeks in the rural area of South Armagh.

**Site Characteristics & Area Characteristics:**

Site is located 300m from Newtown Road, accessed via an existing agricultural lane adjacent to No 3. Land falls from the public road for approx 100m before rising towards the site and falling again to the rear. The field in which the turbine will be located is quite large and extends to the NW. Low hedge defines the NW and SE boundaries. The surrounding area is rural in nature characterised by undulating landscape to the SW with urban development to the SE.

**Site History:**

P/2005/1279/O

Dwelling and Garage

100m South East of 25 Carrowmannan Road, Belleeks

Application Withdrawn: 22.11.2005

**Planning Policies & Material Considerations:**

Strategic Planning Policy Statement for Northern Ireland

Banbridge Newry and Mourne Area Plan 2015.

Planning Policy Statement 2 Natural Heritage

Planning Policy Statement 3 Access, Movement and Parking

Planning Policy Statement 18: Renewable Energy, Supplementary Planning Guidance: Wind Energy Development in Northern Ireland's Landscapes

PPS 21: Sustainable Development in the Countryside,

DCAN 15: Vehicular Access Standards

**Consultations:**

N.I Water – Windfarms – No objection

Belfast International Airport - No objection

Ofcom Northern Ireland – no objection raised



National Air Traffic Services – no objection  
 Env Health Newry and Mourne District Council – further information requested  
 UK Crown Bodies - D.I.O. Safeguarding - No objection  
 Arqiva Services Limited - No objection  
 The Joint Radio Company - No objection  
 P.S.N.I. Information and Communications Services - No objection  
 NIEA – Further information required regarding the Bats Survey, as it stands it is contrary to policy.  
 NIE – wind farm development – no objections  
 UK Crown Bodies - D.I.O. - No objection  
 Transport NI - Downpatrick Office – acceptable in policy terms.

### **Objections & Representations**

3 neighbours notified on 19.11.2010. No objections or representations received.  
 Application advertised on 17.09.2010.

### **Consideration and Assessment:**

Strategic Planning Policy Statement / Banbridge Newry and Mourne Area Plan 2015  
 The Strategic Planning Policy Statement is a material consideration for this application however as there is no significant change to the policy requirements for wind turbines following the publication of the SPPS and it is arguably less prescriptive, the retained policy of PPS18 will be given substantial weight in determining the principle of the proposal in accordance with paragraph 1.12 of the SPPS / BNMAP 2015. The site lies within the Rural Area as designated in the Banbridge Newry and Mourne Area Plan 2015. There are no objections with regard to the Area Plan.

PPS2: Natural Heritage. Policy NH 2 is applicable for this application due to Bat activity in the immediate area. NED has concerns with this proposal and considers that in the absence of further information required to fully assess the likely impacts on natural heritage interests, the proposal would be contrary to Planning Policy Statement 2: Natural Heritage and the Habitats Regulations.

PPS3: Roads have advised that they have no objections

PPS21: CTY1 (Development in the Countryside) - See consideration of PPS18

PPS18: RE 1 (Renewable Energy Development)

a) Public safety, human health or residential amenity;

The proposed wind turbine is set back from the Newtown Road by a distance of approx 280m with the nearest dwellings to the turbine over 160m away this is a sufficient distance to ensure that public safety is not unduly impacted on. Public



health has raised concerns regarding potential for noise nuisance and impact to amenity. Environmental Health requested clarity on the NIA which was sought from the agent on 8<sup>th</sup> November 2016. To date this has not been received.

b) Visual amenity and landscape character;

The site is located in the Carrigatuke Hills Landscape Character Area as identified in the supplementary guidance to PPS18. This area has been branded as having an overall medium sensitivity with regards to wind turbine development. Land rises towards the site from the Newtown Road and then drops off to the rear. The site is quite exposed with only low hedging along the south western and south eastern boundaries. There is no intervening vegetation or other development between the site and public road, and it is considered that uninterrupted views of the turbine are possible when travelling along the Newtown Road out of Belleeks.

c) Biodiversity, nature conservation or built heritage interests;

There are no concerns regarding built heritage. However NIEA has registered concerns in relation to the Bats Survey submitted and in the absence of further information cannot make a full assessment. This information was requested from the agent on 8<sup>th</sup> November 2016 with no response received. On this basis the proposal fails this policy criteria.

d) Local natural resources such as air quality and water quality;

No likely impact

e) Public access to the countryside;

There is no public access at this site as surrounding lands are private.

### Wind Energy Development

(i) That the development will not have an unacceptable impact on visual amenity or landscape character;

This proposal is for one turbine only with a hub height of 30m. It is considered that this proposal will not have an unacceptable visual impact on the landscape character.

(ii) that the development has taken into consideration the cumulative impact of existing wind turbines;

Whilst there is one other wind turbine approved in the area (P/2011/0804/F) the cumulative impact of both turbines is not considered to have a significant detrimental impact on the area.

(iii) that the development will not create a significant risk of landslide or bog burst;

The risk of landslide or bog burst at this location is not significant.

(iv) that no part of the development will give rise to unacceptable electromagnetic interference to communications installations;

No objections have been raised by consultees in relation to interference to communication systems

(v) that no part of the development will have an unacceptable impact on roads, rail or aviation safety;

Belfast International Airport have no objections; proposals will not adversely impact on road, rail or aviation safety.

(vi) that the development will not cause significant harm to the safety or amenity of any sensitive receptors

Problems caused by shadow flicker are rare however the property at No. 22 Carraigh Dua Heights is within the 10 times the rotor diameter of the turbine, although the property is in the outer limits of this area and as it is furthest from the turbine the less pronounced the effect will be. Nevertheless this is a material consideration and the proposal, as submitted will negatively impact this property. Environmental Health requested clarity on the NIA which was sought from the agent on 8th November 2016. To date this has not been received. The proposal fails this policy criterion.

(vii) that above-ground redundant plant (including turbines), buildings and associated infrastructure shall be removed and the site restored to an agreed standard appropriate to its location.

A planning condition could be attached to control this.

The proposal is contrary to (a), (c) and (vi) of policy RE1 as documented above. It is noted that the agent was contacted on 8th November 2016 by letter giving 2 weeks to respond to the comments from Environmental Health and NIEA. It was also pointed out in this letter that the application would be determined on the basis of the information that is already available if the information was not forthcoming. Following a subsequent phone call with the agent he confirmed he wanted to pursue with the application as submitted.

### **Recommendation:**

Refusal

### **Refusal Reasons**

1. The proposal is contrary to the Strategic Planning Policy Statement and Policy RE1 of the Department's Planning Policy Statement 18 'Renewable Energy' and associated Best Practice Guidance in that the applicant has failed to demonstrate that the development will not create an adverse impact on the habitat of protected species or the amenity of nearby residents by reason of noise nuisance and shadow flicker.

2. Having notified the applicant under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that further details were required by NIEA and Environmental Health to make a full assessment which were required to allow the Council to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.

3. The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).

4. The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.

**Case Officer:**

**Authorised Officer:**



<b>ITEM NO</b>	<b>D2</b>				
<b>APPLIC NO</b>	P/2011/0031/F		Full	<b>DATE VALID</b>	1/7/11
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>				
<b>APPLICANT</b>	Kieran McDonnell	31		<b>AGENT</b>	John Ross MacMahon 111n Camlough Road Newry BT35 7EE
	Tullygeasey Road Tullyvallen Newtownhamilton BT35 0EP				

**LOCATION** 250 metres from 31 Tullygeasey Road Newtownhamilton BT35 0EP

**PROPOSAL** Wind turbine, 30 metres Hub height 27 metres rotor diameter

<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>		<b>SUP Letters</b>		<b>OBJ Petitions</b>		<b>SUP Petitions</b>	
	1	0	0	0	Addresses	Signatures	Addresses	Signatures
	1	0	0	0	0	0	0	0

- 1 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that in that the applicant has failed to demonstrate the proposal will not cause significant harm to the amenity of any sensitive receptors arising from noise.
- 2 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).
- 3 The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that development would, if permitted, result in an unacceptable adverse impact on biodiversity and nature conservation interests.
- 4 The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference: P/2011/0031/F**

**Date Received: 7<sup>th</sup> Jan 2011**

**Proposal: Wind turbine, 30 metres Hub height 27 metres rotor diameter**

**Location: 250 metres from 31 Tullygeasey Road Newtownhamilton BT35 0EP**

**Site History: n/a**

### **Objections & Representations**

*No. of neighbours notified=1*

*Advertise expiry= 11/2/11*

*No. of representations received=1*

### **Consideration and Assessment:**

*Planning policies relevant in the determination of this proposal include:*

- *SPPS*
- *PPS2 Planning and Nature Conservation*
- *PPS3 Access, Movement and Parking*
- *PPS18 Renewable Energy*

*Best Practice Guidance to PPS18 'Renewable Energy'*

*Northern Ireland Environment Agency Publication 'Wind Energy Development in Northern Ireland's Landscapes (Supplementary Planning Guidance to Accompany PPS18)' is also of particular relevance.*

*Development Control Advice Note 15: Vehicular Access Standards is also a relevant consideration.*

*The Newry and Mourne District Rural Area Subject Plan 1986-1999: The site is located within the rural remainder.*

*The Banbridge/Newry and Mourne Area Plan 2015: The site is located within the countryside.*

*Policy RE 1 Renewable Energy Development states:*

*Development that generates energy from renewable resources will be permitted provided the proposal, and any associated buildings and infrastructure, will not result in an unacceptable adverse impact on:*

- (a) public safety, human health, or residential amenity;*
- (b) visual amenity and landscape character;*
- (c) biodiversity, nature conservation or built heritage interests;*
- (d) local natural resources, such as air quality or water quality;*
- (e) public access to the countryside.*

*The policy also states that applications for wind energy development will also be required to demonstrate a number of points including:*

- (i) that the development will not have an unacceptable impact on visual amenity or landscape character through: the number, scale, size and siting of turbines;*



*The site is located within Landscape Character Area 68 Carrigatuke Hills as detailed in the NIEA publication 'Wind Energy Development in Northern Ireland's Landscapes'. The overall sensitivity of this Landscape Character Area is noted as medium.*

*This application proposes one wind turbine with a 30 metre hub height (43.5 metre to tip). The visual impact of this wind turbine has been assessed from various vantage points (Please refer to pictures from various points along public roads in close vicinity.) The visual implication of the proposed wind turbine should be discussed at the Department's internal group meeting.*

*Having viewed the attached photographs from the surrounding vantage points I am of the opinion that the visual impact of this turbine is acceptable given the surrounding topography and natural screening.*

*(ii) that the development has taken into consideration the cumulative impact of existing wind turbines, those which have permissions and those that are currently the subject of valid but undetermined applications.*

*The Department has received a number of applications for wind turbines in the wider surrounding vicinity. The nearest of these include P/2011/1055/F and P/2011/0348/F approximately 2Km north-east of the site and P/2012/0845/F located approximately 1.9Km west of the site. All of these applications are currently pending.*

*The separation distances between these proposed wind turbines and the wind turbine proposed under this application are considered adequate to avoid any negative implications from the cumulative impact in the event of planning permission being approved for this wind turbine.*

*(iii) that the development will not create a significant risk of landslide or bog burst;*

*Natural Heritage of Northern Ireland Environment Agency was consulted in relation to this proposal. They did not raise any concerns regarding risk of landslide or bog burst.*

*(iv) that no part of the development will give rise to unacceptable electromagnetic interference to communications installations; radar or air traffic control systems; emergency services communications; or other telecommunication systems;*

*A number of organisations were consulted to assess the impact of the proposal on communications installations, telecommunication systems and emergency services communications. These include:*

- Joint Radio Company*
- OFCOM*
- Arqiva*
- Defence Infrastructure Organisation Land Management and Disposals NI*
- NI Water Windfarms*
- PSNI Information and Communications Services*

*None of these consultees raised any objections to the proposed wind turbine.*

*To ensure the proposed wind turbine will have no negative impact on air traffic control systems, the following bodies were consulted:*

- National Air Traffic Services*
- Belfast International Airport*
- Belfast City Airport*
- Defence Infrastructure Organisation Safeguarding Department*

*None of these organisations raised any concerns regarding the proposal.*

*(v) that no part of the development will have an unacceptable impact on roads, rail or aviation safety.*

*Roads Service was consulted and raised no objections to the proposed wind turbine. Paragraph 1.3.54 of the Best Practice Guidance to PPS18 states the turbine should be set back fall over distance plus 10% from the public road to achieve maximum safety. The location of the proposed turbine is located within this safety distance.*

*There is no rail network in close proximity to this proposal.*

*Consultations were carried out with the following bodies to assess the impact of the proposed turbine on aviation safety:*

- George Best Belfast City Airport*
- Belfast International Airport*
- National Air Traffic Services*
- Defence Infrastructure Organisation Safeguarding Department*

*None of these bodies raised any objections in relation to aviation safety.*

*(vi) that the development will not cause significant harm to the safety or amenity of any sensitive receptors (including future occupants of committed developments) arising from noise; shadow flicker; ice throw; and reflected light.*

*Only properties within 130 degrees either side of north, relative to the turbine can be affected at these latitudes in the UK as turbines do not cast long shadows on their southern side. In this case no sensitive receptors are located within 130 degrees either side of north within ten times the rotor other than the applicant's address no. 31. The buildings to the north of this are located within this diameter but these are agricultural.*

*Paragraph 1.3.2 of the Best Practice Guide to PPS18 states the developer will often need to provide information on local environmental impacts including noise, shadow flicker, electromagnetic interference etc.*

*The Environmental Health Department of Newry and Mourne District Council were consulted in relation to this proposal. They have expressed concerns regarding potential loss of amenity due to noise. They requested details of noise produced by the proposed wind turbine at a number of different wind speeds. The applicant submitted information to address this issue.*

*The Environmental Health Department was re-consulted with this information. They were not satisfied this information addressed their concerns. They noted the nearest sensitive receptor other than the applicants address to be approximately 240 metres from the proposed wind turbine. They requested the applicant to undertake a noise*



*assessment for the proposed wind turbine in accordance with ETSU-R-97. They recommended planning approval should not be granted until this information is received. (Please refer to consultation response received from Environmental Health on 4/12/12.)*

*Additional information was received by the Department on the 13<sup>th</sup> Oct 2013 and 7<sup>th</sup> August 2013. Environmental Health having viewed this information referred the consultant the Good Practice guide as the assessment is not complete and to provide a document on the model used in the noise impact assessment.*

*The applicant has failed to successfully address this concern of noise disturbance they have failed to demonstrate the proposed wind turbine will not create noise disturbance in compliance with criteria (vi) of Policy RE1.*

*(vii) that above-ground redundant plant (including turbines), buildings and associated infrastructure shall be removed and the site restored to an agreed standard appropriate to its location.*

*If this wind turbine application is to be approved It is recommended the following condition should be attached to the decision notice:*

*- All above ground structures shall be dismantled and removed from the site 25 years from the date when the wind turbine is commissioned to the electricity grid or shall be removed if electricity generation has ceased on site for a period of 6 months (unless further consent has been granted).*

*Reason: To restore the habitat and maintain the landscape quality of the area.*

*This condition will ensure the proposal complies with this requirement.*

*Northern Ireland Environment Agency was consulted in relation to this proposal. They raised concerns regarding potential collision risk to bats in the area. Bats are a European protected species. They recommend there should be a 50 metre buffer zone between the tip of the turbine blade and existing habitat features (including trees and hedgerows). They also stated a buffer zone should be provided for birds.*

*They therefore recommended the wind turbine should be relocated at least 50 metres from any hedgerows, trees, watercourses or buildings and structures which may have the potential to be used by bats. They also advised if there are no suitable alternative locations the applicant has the option has the option to carryout a bat survey.*

*This information was relayed to the applicant. A letter was received requesting the Department to make a determination subject to the outcome of a Bat Survey. The*

*Department is not permitted to grant planning permission subject to such a negative condition given bats are a European Protected Species.*

*NIEA consultation response was received on 29th May 2012. Bat Surveys are carried out between May and September. The Department believes this was a reasonable period of time in which to complete a bat survey.*

*Further consultation on receipt of the Bat Survey report which was uploaded on the 20<sup>th</sup> Aug 2014 has taken place. The report was considered by NIEA and they raised concerns with the location of the turbine and the level of bat activity recorded at the site.*

*As the applicant has failed to address NIEA's concern regarding potential negative impact on bats the proposal is considered contrary to criteria (c) of Policy RE1 of PPS18.*

#### *Objection Received:*

*A letter of objection was received from Mr Ronan Finnegan of 34 Aghadavoyle Road, Jonesborough. Mr Finnegan objects to the proposed wind turbine on the following grounds:*

*-As the height of the wind turbine exceeds 15 metres an EIA is required. The application provides no evidence of an EIA or screening for an EIA.*

*-As there are no notes to inform what the turbine's outer parts are made of and what colour they are it is hard to make a judgement on visual integration.*

*-No contours on the site location map to provide valuable information in relation to the surroundings.*

*The Department did carry out an EIA determination on receipt of this application. It was determined this application did not require an Environmental Statement.*

*The proposed plans state the tower is to have a white metallic finish.*

*Although no details of contours were provided the Department did carry out a thorough investigation into the visual integration of the proposed wind turbine from various view points along the surrounding public roads. (Please refer to attached map and photos from various viewpoints along the public road.)*

*Recommendation: Refusal is recommended on the following grounds:*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that*

*in that the applicant has failed to demonstrate the proposal will not cause significant harm to the amenity of any sensitive receptors arising from noise.*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 2: Natural Heritage Policy NH2, in that development would, if permitted, harm bats, which are protected under the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended).*

*The proposal is contrary to the Strategic Planning Policy Statement and the Department's Planning Policy Statement 18: Renewable Energy, Policy RE1, in that development would, if permitted, result in an unacceptable adverse impact on biodiversity and nature conservation interests.*

*The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.*

**Recommendation:**

**Refusal**

.....



<b>ITEM NO</b>	<b>D3</b>			
<b>APPLIC NO</b>	P/2011/0728/O	Outline	<b>DATE VALID</b>	8/11/11
<b>COUNCIL OPINION</b>	<b>REFUSAL</b>			
<b>APPLICANT</b>	Mr Oliver Hearty 24 Drumalt Road Silverbridge Newry		<b>AGENT</b>	Milligan Reside Larkin Architects Ltd 56 Armagh Road Newry BT35 6DN 30253755

**LOCATION** Lands to the rear and west of Nos 71-79 Dundalk Street Newtownhamilton

**PROPOSAL** Site for housing development (Amended Scheme)

<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>		<b>SUP Letters</b>		<b>OBJ Petitions</b>		<b>SUP Petitions</b>	
	2	0	0	0	Addresses	Signatures	Addresses	Signatures
					0	0	0	0

- 1 The proposal is contrary to Strategic Planning Policy Statement and Policy QD 1 (Criteria A, C, F, G, H and I) of the Department's Planning Policy Statement 7 (PPS 7) : Quality Residential Environments and Planing Policy Statement 12: (PCP1 and PCP2) in that the applicant has failed to demonstrate that the proposal will create a quality and sustainable residential environment.



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference: P/2011/0728/O**

**Date Received:** 11.08.11

**Proposal:** Site for housing development (Outline planning permission for 4 dwellings  
– 2 sets of semi-detached, 2 storey dwellings

**Location:** Lands to the rear and W of Nos 71-79 Dundalk Street, Newtownhamilton

**Site Characteristics & Area Characteristics:**

Site is located within the small town of Newtownhamilton fronting onto Dundalk Street within an area which is predominantly residential. The site is set between two sets of semi-detached properties, comprising of overgrown land which is set above the road level and bounded to the road by a small retaining wall with land rising steeply westwards.

**Site History:**

No planning history relating to the application site

**Within the vicinity:**

**P/2009/0344/F** – Demolition of existing buildings and proposed residential development to include 8 No. Apartments. Lands at 83 Dundalk St, Newtownhamilton. Approved 26.01.12 (South of application site)

**P/2001/2211/RM** - Erection of dwelling. Approved 01.07.02 (Adjacent and N)

**P/1989/0070** – Housing 4 dwellings. 71 -73 Dundalk Street. Approved 16.09.89 (Immediately adjacent and NE)

**Planning Policies & Material Considerations:**

**Banbridge/ Newry and Mourne Area Plan 2015:** Site is within the development limits of Newtownhamilton, unzoned

Planning Policy and Other Guidance Considered: SPPS and PPS7 (QD1), PPS3, PPS12, DCAN8, DCAN 15

**PPS3:** Transport NI have raised no major objections and parking is adequately accommodated

### **SPPS, PPS7: QD1 and PPS12 (PCP1, 2)**

#### **Site Context/ Characteristics:**

Development either side of the site is characterised by two storey, semi-detached and terrace housing which immediately abuts the public footpath with on street car parking, little or no formalised front garden and small gaps between houses along the street frontage (gaps are between 1.5m to 3.5m to allow access to the rear of properties). The majority of properties along Dundalk Street are generally simple in form, displaying traditional design of linear and symmetrical form with unbroken ridges of pitched/ hipped roofs and chimney on the ridge of the property. Whilst there is a range of external finishes displayed within the immediate vicinity of the site buildings tend towards one finish such as redbrick or painted render and dash but generally not a mix of finishes on one building.

Proposals replicate the two storey semi-detached form that is found at this location. However the overall development does not respect the surrounding context of the area which includes the creation of a 'gaping' hole in a relative unbroken street frontage to accommodate off street car parking which will in turn attract substantial ground works and excavation to lower ground levels to accommodate development and will require several retaining wall structures within the layout which is deemed unacceptable. The need to use structural retaining walls in order to accommodate development is generally an indicator of overdevelopment of a site (See para 4.13 of PPS7) and is contrary to policy.

#### **Archaeology and Built Heritage**

No features identified

#### **Form, Materials and Detailing:**

Whilst it is acknowledged that the intended design and finishes are to replicate that of the 4 dwellings immediately adjacent and NE. These existing properties are not the best of example of predominant built form found on Dundalk Street with the design and finishes of the proposed properties out of keeping due to the use of mixed external finishes, decorative peaks above windows projecting from the roof, chimneys below the ridge line, porch covering, the front façade is not linear and the front facade is broken up and set back which is not a feature of other house types found at this location.

#### **Layout:**

Emphasis has been placed on the need for private on site car parking which will result in the creation of an unattractive vista along the street. This vehicular provision will have a detrimental impact visually but the proposed drive would be set higher



than the proposed dwellings either side. Furthermore the car park is set some 3.5m above the existing road level and set 15m away from proposed dwellings and has not been designed for ease of access by future residents but also no regard has been given to those whose mobility is impaired. The introduction of communal car parking to the rear of proposed as well as existing properties will result in an increase in activity by both vehicles and pedestrians to the rear of these properties causing adverse impact to amenity. The position of the car parking set to the rear of the properties which will not be overlooked by habitual rooms will result in lack of supervision of this area and potential for crime/ antisocial behaviour.

### **Local Neighbourhood Facilities**

The site is located within the development limits of Newtownhamilton within walking distance of local neighbourhood facilities

### **Density**

The site when compared with existing residential development and plot sizes displayed along Dundalk Street is quite similar in terms of density. However in terms of the topography of the site it is difficult to maintain similar density levels to that of surrounding development without the need for extensive engineering works to accommodate.

### **Landscape Design**

The existing site has no specific landscape features in which to retain

### **Public/ Private Open Space**

Private open space has been allocated to each of the 4 dwellings this area of open space is split over two levels and measures less than 40sqm per unit which is insufficient and less than the recommended parameters of garden space provision which is 70sqm (See 5.19 of Creating Places). Furthermore the arrangement of the garden space over two levels with stepped access renders these areas unusable for those whose mobility is impaired but each of the garden areas are enclosed by retaining walls ranging between 2.5 -5 m which will create some level of overshadowing and loss of light within areas of private amenity space. Whilst sufficient area has been provided for bin storage this is set 7.5 metres away on higher ground which is closest accessed by steps to the rear of the proposed dwellings again this has been poorly designed and located.

### **Movement**

Although the layout does not contribute to the quality of the residential development it nevertheless incorporates linkage to the existing footpath encouraging sustainable patterns of movement.

### **Parking**

Sufficient parking has been provided to accommodate development however this is of little consequence when the car parking is on higher ground, set too far away from

the proposed properties, is not readily accessible by potential occupiers and has not been designed for ease of use by those whose mobility is impaired. The car park is poorly located and cannot be informally surveilled by occupiers of the proposed dwellings.

### **Privacy/ Impact to Amenity**

Proposals for the creation of access/ hard standing and car parking to the rear of the development will introduce and generate activity to the rear of the proposed as well as existing properties creating adverse impact to the amenity of future occupants as well as neighbouring dwellings due to noise, general nuisance and disturbance generated by vehicular and pedestrian activity to the rear of these properties. The use of high retaining walls throughout the scheme will result in overshadowing and loss of light.

### **Security from Crime**

Although development will front onto the road there is provision within the scheme for a road to access a communal car park to the rear of proposed dwellings. Such provision will allow full access to the rear of each dwelling house. Due to the car park being located to the rear of these properties with spaces set some 15m back from the properties on land 2.5m above the finished ground floor level, this entire area will be out of the visual range from habitual rooms such as kitchens/ living rooms. Furthermore the proposed access to this area is also poorly supervised with lack of overlooking windows onto this area. Therefore the layout and design of dwellings do not enhance security from crime at this location and exposes the entire development to unsecure and unsafe living conditions.

### **PPS12: PCP1 (Increased Housing Density without Town Cramming)**

Whilst the number of units is comparable to similar plots sizes within the town. In order to facilitate parking and adequate amenity space the development will require extensive engineering solutions to accommodate development with the overall development not respecting the existing built development, will have an adverse visual impact on character, environmental quality and will have detrimental consequences upon the amenity of existing and proposed occupants of the development.

### **PPS3: Sustainable Forms of Development**

Site is located within the defined limits of the settlement of Newtownhamilton where a promotion of development is encouraged within these areas.

### **HS4: House Types and Sizes**

Different house types are provided within the scheme in line with HS4 of PPS12

*In consideration of the above proposals fail to meet the Strategic Planning Policy Statement as well as PPS7: Policy QD1 criteria a, c, f, g, h and i of QD1 and PPS12: PCP1 and 2 of PPS12*

**Consultations:**

**Transport NI (02.07.15)** - No objection

**Construction (07.11.14)** - Difficulties in achieving sufficient tying of the retaining wall, further information/ clarity sought

**NIEA Monuments (07.03.13)** - No archaeological objection

**NIW(29.09.11)** - Public and foul sewer within 20m but no surface water sewer

**Rivers (14.09.11)** - No objection

**NIEA Water Man (06.09.11)** - No objection to sewerage disposal element

**Development Plan (02.09.11)** – No issue of prematurity

**Objections & Representations**

24 neighbours notified

Advertised 23.08.11, 15.01.13 and 30.09.14

**Objections:**

Martin Murphy, 79 Dundalk Street correspondence dated 19.10.11 and 27.10.14

**Issues Raised:**

The applicant has included land within his application which is not in his ownership

**Consideration of Issues:**

The site location map was amended 17.12.12 with the redline of the site boundary reduced to exclude third party land (comprising that to the rear of 79 and 81 Dundalk Street) the site location map and address have been amended and re-advertised, no further objections have been received

**Consideration and Assessment:**

The overall proposals fail to meet the Strategic Planning Policy Statement as well as PPS7: Policy QD1 criteria a, c, f, g, h and i of QD1 and PPS12: PCP1 and 2 of PPS12 in that development is out of context within its surroundings in terms of form, detail and layout, is an overdevelopment of the site, will cause adverse impact to the amenity of existing but also future occupants of the development, lacks adequate private amenity space, has not been designed to take into account the requirements of whose mobility is impaired with the development unsecured and exposed to concerns relating to personal safety, crime and antisocial behaviour, on this basis it is therefore recommended to refuse the application.



**Recommendation: Refusal**

**Refusal Reasons:**

The proposal is contrary to Strategic Planning Policy Statement and Policy QD 1 (Criteria A, C, F, G, H and I) of the Department’s Planning Policy Statement 7 (PPS 7) : Quality Residential Environments and Planning Policy Statement 12: (PCP1 and PCP2) in that the applicant has failed to demonstrate that the proposal will create a quality and sustainable residential environment.

**Photos from Dundalk Street**







# MBA Planning

1<sup>st</sup> Floor  
4 College House  
CityLink Business Park  
Belfast  
BT12 4HQ

T: 028 9042 1011

E: [planning@mbaplanning.com](mailto:planning@mbaplanning.com)

W: [www.mbaplanning.com](http://www.mbaplanning.com)

## Committee Report

Residential development at Dundalk Street,  
Newtownhamilton

January 2017

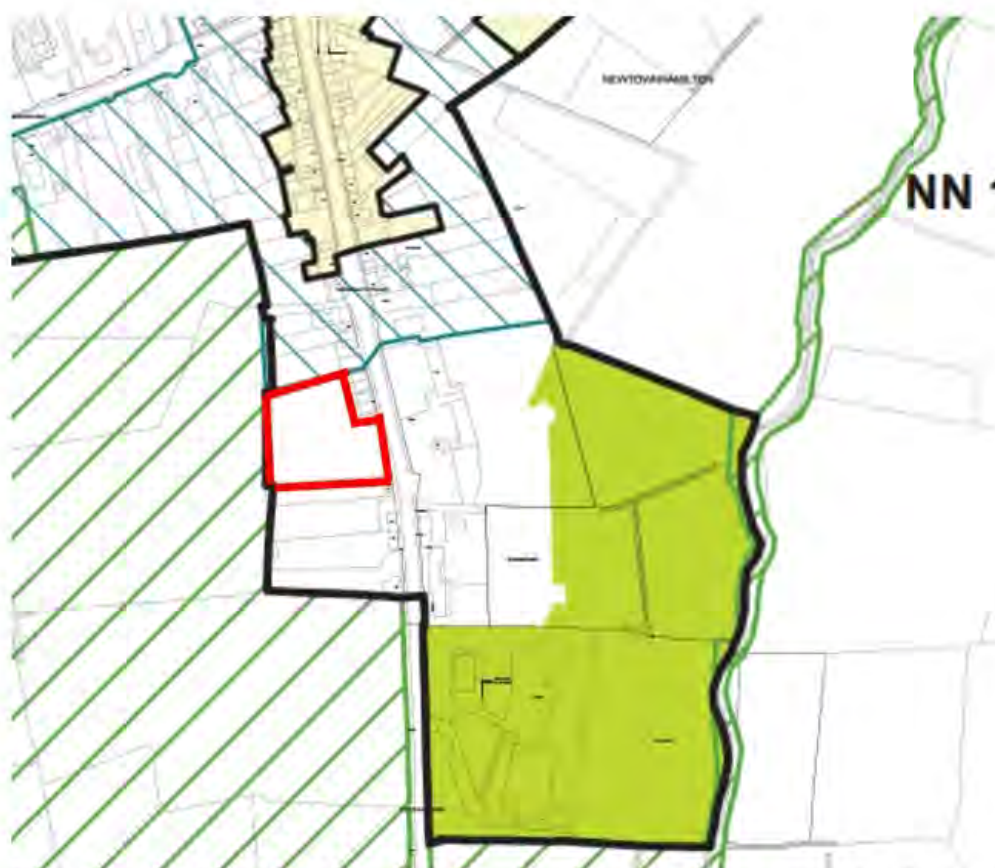
### The Issues

- This site is within the settlement limit and so there is a general presumption in favour of development on the site;
- The application is in outline form – it seeks to establish the acceptability in principle that the site can be developed for housing;
- The plans accompanying the application are marked ‘for illustrative purposes only’ because they represent one particular way the site might be developed – but there may be other ways;
- The case officer’s assessment has treated this application as a fully worked up proposal – many criticisms have been made about detailed matters that ought to be considered as reserved matters;
- The application has been in the system for six and half years;
- During this time the applicant and his team has tried their best to reach an appropriate solution;
- Refusal has been recommended which appears to suggest that the site is unacceptable for the development of housing for a range of reasons but mainly due to its sloping topography;
- The Council has wide powers to impose conditions to make development acceptable but no consideration has been given to whether they could be used in this case.

### Area Plan context

1. This site has been included within the settlement limit for many years;





2. The settlement limit distinguishes between those areas that are more naturally considered part of the town than the countryside;
3. The last area plan review was completed just over three years ago;
4. This fully scrutinised Newtownhamilton's position in the settlement hierarchy, the definition of its settlement limit, the amount of housing provision and any other appropriate environmental designations;
5. The main conclusions were that:
  - Newtownhamilton should be retained as a town - this was necessary to provide a **framework for growth and development**;
  - Only one small site was added into the settlement limit – this would **concentrate development on remaining sites**;
  - The settlement limit was drawn to take account of the role of the settlement whilst also protecting its natural setting – it was not thought appropriate to remove this site or any part of it from the settlement limit;
  - There were no special landscape features on this site that justified any special designations.

#### Context

6. Newtownhamilton is set on rising land but the settlement limit has distinguished between the land that is capable of being developed and the land that should not be developed because it is thought to contribute to its natural setting;
7. The image below shows the immediate context of the application site and the way in which the land has been engineered to accommodate the adjacent dwellings.



**Character**

- 8. This is generally comprised of two storey semi detached and terrace housing rising up from the back of the pavement with narrow front gardens and on street parking or rear yards.



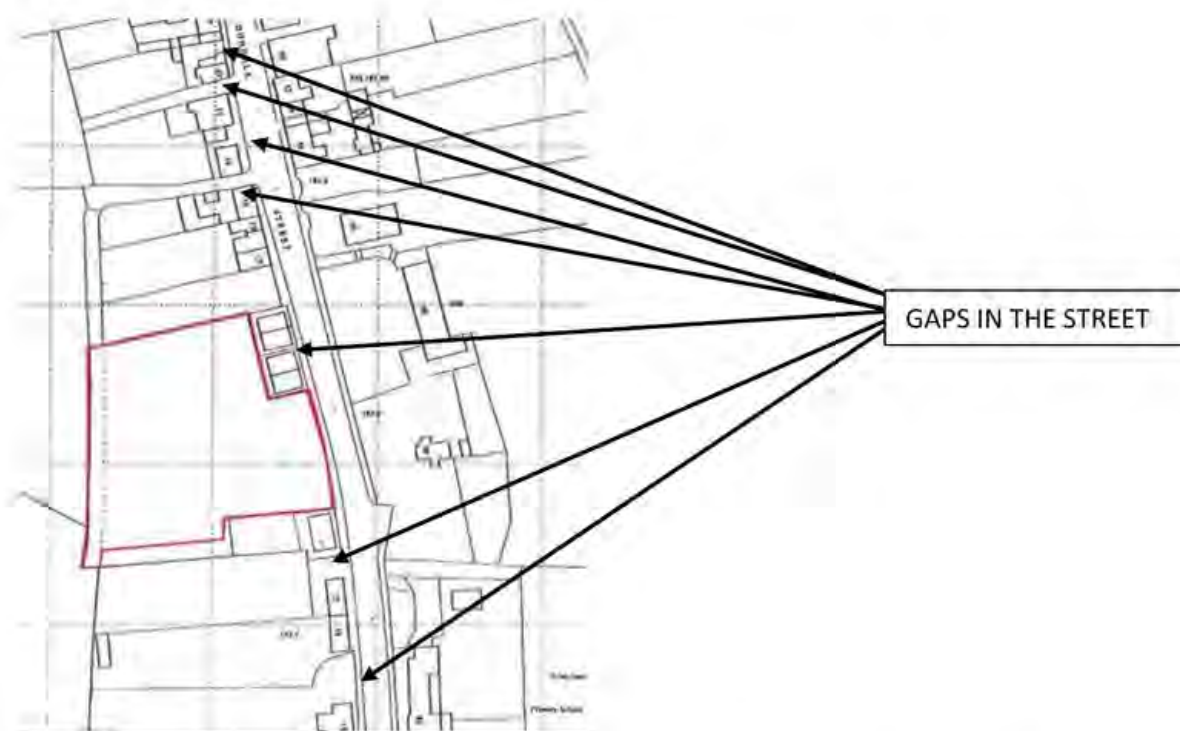
- 9. The site appears as an undeveloped overgrown gap site in a mainly continuously and substantially built up frontage. It is entirely appropriate for development purposes.
- 10. The indicative scheme proposes that there should be two semi detached dwellings that will infill this gap, contribute to a strong urban form and round off the existing development pattern. This arrangement is entirely consistent with the character of the area.



- 11. The vehicular access is thought to be inconsistent with the character of the area because it creates a 'gap' in a relative unbroken street frontage. I disagree. Gaps in the street scape are consistent



with the character of the area as shown from the layout plan and the extract from the site location plan.



12. However if the 'gap' is found to be fatal to the scheme, this can be easily designed out at reserved matters stage. For example, the gap could be filled by another unit or its impact could be masked by the creation of a built archway.



### Form, materials and detailing

13. These are classic reserved matters issues that the application does not seek to address. The applicant would be happy to deal with the case officer's concerns through the standard design and external appearance conditions that would be imposed within an outline approval.

### Layout and Parking Considerations

14. The case officer objects to the car parking arrangement at the rear. This is because it will be at a higher level than the road, is not conveniently located, may cause problems for those with limited mobility, is poorly supervised and may cause amenity issues.
15. However parking is another matter that can be addressed through the standard access reserved matters condition.
16. On street parking which is in keeping with the character of the area is one way to overcome this. A split level house design with an integral garage is another.

### Public and Private Open Space

17. The case officer states that there is inadequate amount of open space and that its arrangement over two levels means that it is unusable. The case officer complains that the incorporation of retaining walls will cause overshadowing and loss of light and the bin storage is too far away.



18. The entire site measures 0.4 hectares – it clearly can provide open space levels well in excess of the Creating Places guidance.
19. Its arrangement and usability is a matter that can be resolved through the standard reserved matters landscaping condition by the incorporation of a planted landscape banks for example;
20. Bin storage is also a matter of detailed design – this can also be resolved through an internal bin store for example.

#### **Concluding comments**

1. PPS7 says that great care must be taken to ensure that development schemes do not unacceptably harm the local character of the area - meaning that some harm to character is permissible provided it is not unacceptable.
2. In weighing this decision the Committee is asked to have regard to:
  - The site's position in the settlement limit;
  - The applicant's persistence in seeking to achieve an acceptable scheme on this site over a long period of time;
  - The need for additional housing and the requirement to make efficient use of land within the settlement limit;
  - The fact that the site was entirely retained within the settlement limit with no environmental designations and so must be suitable for development as part of the urban footprint;
  - The overgrown appearance of the site that is incongruous in the streetscene; and
  - That four semi detached houses along the roadside is entirely consistent with the character of the immediate area.
3. The Committee is invited to overturn the recommendation to refuse this application.

**ITEM NO** D4  
**APPLIC NO** P/2012/0743/F Full **DATE VALID** 9/19/12  
**COUNCIL OPINION** REFUSAL

**APPLICANT** Mr Brian Cunningham C/o Agent  
 lting 38  
**AGENT** Barry Owens  
 Consu  
 Highfields Avenue  
 Newr  
 y  
 BT35  
 8UG  
 078679  
 76610

**LOCATION** Valley Business Park  
 48 Newtown Road  
 Rostrevor  
 BT34 3BZ

**PROPOSAL** pitches, 2 Part change of use to tourism park incorporating 47 No. touring caravan  
 No. log cabins, tent pitching areas, gate house, pump house, toilets and showers and new microhydropower system

<b>REPRESENTATIONS</b>	<b>OBJ Letters</b>	<b>SUP Letters</b>	<b>OBJ Petitions</b>	<b>SUP Petitions</b>	
	3	0	0	0	0

	<b>Addresses</b>	<b>Signatures</b>	<b>Addresses</b>	<b>Signatures</b>
	0	0	0	0

- 1 The proposal is contrary to Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
- 2 The proposed log cabins are contrary to Policy TSM5 of Planning Policy Statement 16 - Tourism, because they are not within the grounds of an existing or approved hotel, self catering complex, guest house or holiday park, there are not 3 or more new units close to an existing or approved tourist amenity that is a significant visitor attraction in its own right, and it does not involve the restoration of an existing clachan or close, through conversion and / or replacement of existing buildings.
- 3 The proposed holiday park is contrary to Policy TSM6 of Planning Policy Statement 16 - Tourism, because the scale of the development would have an adverse impact on the visual amenity and rural character of the area, it has not been demonstrated that effective integration into the landscape can be secured primarily through the utilisation of existing natural features, there is inadequate provision for communal open space, the layout of caravan pitches represents cramming and is not informal or discrete, the design of ancillary buildings does not reflect local traditions of form, materials and detailing, it has not been demonstrated that the environmental assets of the site can be retained and integrated in a suitable manner into the overall design and layout, and it is therefore not a high quality and sustainable form of tourism development.
- 4 The proposal is contrary to Policy TSM7 of Planning Policy Statement 16 - Tourism, with regard to criteria b (layout and design), c (boundary treatments), d (drainage), e (designing out crime), h (effects on residential amenity), i (impact on natural heritage),





Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** P/2012/0743/F

**Date Received:** 19<sup>th</sup> September 2012

**Proposal:** Part change of use to tourism park incorporating 47 No. touring caravan pitches, 2 No. log cabins, tent pitching areas, gate house, pump house, toilets and showers and new micro hydropower system

**Location:** Valley Business Park, 48 Newtown Road, Rostrevor, BT34 3BZ.  
The site is located 1 mile NE of Rostrevor.

**Site Characteristics & Area Characteristics:**

The site is located at "Valley Business Park", 48 Newtown Road outside Rostrevor in the Mourne Area of Outstanding Natural Beauty. It comprises a relatively large folio of land adjacent to Newtown Road, in the open countryside. The site is situated in a narrow valley that runs parallel with Kilbroney Road and Newtown Road. The terrain falls from south east to north west, away from the road and down to Kilbroney River which runs along the north western boundary of the site. The difference in ground levels is approximately 20 metres, from Newton Road to Kilbroney River. The overall site measures approx. 3.5 ha, however this includes a number of industrial units and a Builders' Merchants at the western edge of the site. The upper part of the site, along Newtown Road, is partially overgrown and some site works have been carried out in the past. A new dwelling has been constructed close to the south eastern boundary (No. 48A). There are belts of mature vegetation along each of the site's four boundaries, including a number of mature trees to the north, south and west. Part of the vegetation has been removed along the northern part of the roadside boundary. There is a set of overhead power lines running through the middle of the site, from north to south. Mid-way along the site's road frontage, the site wraps around a private dwelling house. This house is well screened with mature vegetation, and the house is set in a plot measuring approx. 40 metres by 40 metres. Views into and through the site are restricted on Newtown Road, however there are clear uninterrupted views through the site from Kilbroney Road which is approx. 220 metres from the western boundary of the site, at a higher level. The industrial units are set at the lowest part of the application site, and their impact is therefore not as pronounced as any development on the upper part of the site would be despite their



scale, finishes and colour. The main vehicular access to Newtown Road is close to the south eastern boundary of the site. There is a newer secondary access at the north eastern corner and some gravel tracks have been created within the site to link the two accesses. These works are subject to an enforcement investigation.



Proposed site for caravans



New dwelling within site



Builders Suppliers premises



Main entrance from Newtown Road



Site from Kilbroney Road to west

The site is located in a rural area 1 mile north east of Rostrevor. It is in an unzoned area outside settlement limits on the Banbridge, Newry and Mourne Area Plan 2015. It is also within the Mournes and Slieve Croob Area of Outstanding Natural Beauty. It is in close proximity to the Strategic Natural Resource of the Mournes and would be

well located for tourists with handy access to walking routes into the southern and western side of the mountain range. The Rostrevor River to the west of the site is a Site of Local Nature Conservation Importance (SLNCI 151) and its associated fluvial flood zone covers part of the site.

**Site History:**

There have been no previous planning applications on the main part of the site proposed for the tourism park.

The new dwelling at the entrance was approved as security for the existing business park under applications P/2002/0536/O and P/2005/3021/F.

Replacement of the other roadside dwelling outside the site boundary (No. 52) was approved under applications P/2006/0558/O and P/2009/1418/F. These approvals have not been implemented and appear to have lapsed. The owner of the property has objected to the tourist park application.

A replacement office associated with the existing business 'Kilbroney Timber Frame Homes' was approved under application P/2010/0437/F.

The current application was presented to the former Newry and Mourne District Council as a refusal on 9<sup>th</sup> May 2013, with 12 refusal reasons given. The decision was held to allow the submission of information which had previously been requested. The application was then re-assessed following the publication of PPS16. This left a total of 10 revised refusal reasons based on the updated policies. The application was not re-presented to the legacy Council due to delays with the agent providing further information and the transfer of planning powers to the new Councils. The application was transferred to Newry, Mourne and Down District Council on 1st April 2015 under paragraph 2 of Schedule 2 to the Planning (2011 Act) (Commencement No. 3) and (Transitional Provisions) Order (Northern Ireland) 2015 as it remained undetermined at that date.

In July 2016, the agent was given a comprehensive list of the further information required to progress the application. This included changes to the layout to reflect the conclusions of the otter survey and to preserve the amenity of No. 52 Newtown Road, a substantial reduction in the number of pitches with soft landscaping provided between them, the provision of quality communal open space, amendments to the access and Construction Method Statement, provision of a Flood Risk Assessment and a Drainage Assessment, details of the proposed water turbine, details of in-river structures and fish protection measures, a survey of existing trees and a bat survey if any trees are to be removed, a specification for new planting, details of external lighting, and further cross sections. The information was to be submitted by 2<sup>nd</sup> September 2016 and the agent advised that he was working on it, however, no new information has been provided. Given the length of time this application has been in the system, the Council cannot continue to hold it. The application will be determined as it currently stands.



**Planning Policies & Material Considerations:**

- The Regional Development Strategy (2035)
- The Strategic Planning Policy Statement for Northern Ireland (SPPS)
- Banbridge, Newry & Mourne Area Plan 2015
- PPS2 – Natural Heritage
- PPS3 – Access, Movement & Parking
- DCAN15 – Vehicular Access Standards
- PPS 4 – Planning and Economic Development
- PPS15 – Planning and Flood Risk
- PPS16 – Tourism
- PPS18 – Renewable Energy
- PPS21 – Sustainable Development in the Countryside
- Building on Tradition Sustainable Design Guide

**Consultations:**

Newry and Mourne District Council – The former Council wrote to the DOE in support of the application on 12<sup>th</sup> December 2012 following a discussion at the Planning Development Committee. They cited tourist need for the proposal and job creation.

TransportNI – Newtown Road to be widened to 5.5m along the site frontage and drainage details to be provided.

NI Water – Public water supply and foul sewer available (with capacity at WwTW).

Environmental Health – Details of the proposed turbine type and sound power output are required and have not been submitted. A Caravan Site Licence application will be required if the application is approved.

NIEA – Standard advice on sewerage and drainage. Abstraction and Impoundment licence application required for proposed micro hydro system. An otter survey, bat survey and construction method statement were required along with retention of trees, details of external lighting and a plan of new planting. Of these, only the otter survey and construction method statement have been submitted and they do not fully address the concerns raised. The plans as submitted would adversely affect otters due to the proximity of the hydro intake and caravan pitches to a holt. No detail of modifications to the river bank has been provided.

DCAL Inland Fisheries – DCAL has no remit on this river: defer to Loughs Agency.

Rivers Agency – Flood Risk Assessment and Drainage Assessment required.

Loughs Agency – Additional information required on the proposed weir, water turbine and fish protection measures.

Shared Environmental Services – No likely significant effects on Carlingford Lough SPA or any other European site.

Northern Ireland Tourist Board – Expressed support for additional caravan and camping accommodation in this area.



**Objections & Representations:**

The application was advertised in the local press on 12<sup>th</sup> October 2012 and four neighbouring properties were notified of the proposal on 16<sup>th</sup> October 2012, and again on 15<sup>th</sup> April 2013. Several letters of objection were received from the owner of No. 52 (which is not currently occupied). The issues raised can be summarised as follows:

- The validity of the application has been questioned due to perceived inaccuracies in the description of the development and with the site address provided;
- Inappropriate nature and scale, impact on the character of the landscape and development is incompatible with existing industry;
- Failure to comply with TOU Policies of PSRNI and Draft PPS16;
- Lack of supporting information to demonstrate need for the development;
- Impact on habitats / wildlife, and lack of information on micro hydro-plant;
- Impact on residential amenity to adjacent property;
- General road safety concerns – sightlines, creation of a new access, inadequate infrastructure;

**Consideration of representations:**

- The Council is content that the application is valid. The site address has been accurately described and no third parties have been prejudiced as a result of the wording of the description of the proposed development or the stated site address;
- Following an initial recommendation for refusal, there have been changes to several relevant policies and the previous planning authority then accepted the principle of a tourist use on the site. This overcomes previous concerns under PPS4 regarding incompatibility with existing industry. However, concerns remain regarding the scale of the facility and its impacts on the surrounding area;
- The PSRNI and draft PPS16 have now been superseded by the finalised version of PPS16 which should be read in conjunction with the relevant provisions of the SPPS. A number of policy deficiencies remain;
- The applicant is no longer required to demonstrate tourist need for a camping park under PPS16;
- Despite the submission of an otter survey, there is still insufficient detail to give assurance that protected habitats and species will not be adversely affected by the proposal and there is a lack of information on the proposed micro-hydro plant;
- The Council is concerned about the amenity impact on the adjacent house (No. 52) due to noise, nuisance and general disturbance. Amendments to the layout were requested to address these concerns, but have not been provided;
- TransportNI has not indicated any concerns in relation to the adequacy of the existing roads infrastructure provided the carriageway is widened at the entrance, and any issues with sight lines crossing third party lands are essentially civil matters.

**Consideration and Assessment:**

Most of the proposed caravan pitches will be located along the centre of the site with additional pitches in the NW corner. There will be two 2-bedroom log cabins to the west of No. 52 and tent pitching and picnic areas to the north and south of No. 52, close to the roadside. There will be a small toilet block in the NW corner of the site and a larger toilet and shower block to the rear of the new dwelling No. 48A. The

new access point at the NE corner will be used and a small gatehouse / office will be erected here. There will be a children's play area to the west of the main development road. The micro hydro intake point on the Kilbroney River will be at the northern corner of the site. There will be a pump house at the SW corner before the water is returned to the river. A penstock pipe which snakes around the existing warehouses will connect the two locations. No details of the pipe, intake or turbine have been provided.

In a supporting statement submitted in May 2013, the agent argued that the proposal constituted a farm diversification proposal. However, P1C Forms in relation to the farm business were not provided to enable further assessment of this point. In June 2013 the final version of PPS16 was published. This removed the requirement to demonstrate tourist need and increased the scope for holiday parks in the countryside. On this basis, the principle of tourist use on this site has been accepted (subject to changes to the layout and other information which the agent has so far failed to provide) and there is no need to rely on diversification of an existing farm business.

Policy RG4 of the **Regional Development Strategy 2035** aims to promote a sustainable approach to the provision of tourism infrastructure. All new or extended infrastructure required to support and enhance the tourist industry needs to be appropriately located and sited with proper regard to tourism benefit and the safeguarding of the natural and built environment on which tourism depends. The site is located in close proximity to the Strategic Natural Resource of the Mournes. The principle of the proposal and its impact on the environment will be assessed under existing operational policy below.

Section 45 of the Planning Act (Northern Ireland) 2011 requires the Council to have regard to the local development plan, so far as material to the application, and to any other material considerations. The site is currently within the remit of the **Banbridge / Newry & Mourne Area Plan 2015** as the new council has not yet adopted a local development plan. The Plan reflects the approach of the RDS in seeking to provide a choice of tourist accommodation whilst balancing this against the need to protect the natural and built environment. There is no specific policy for tourism development. The site is outside settlement limits in a rural area and within the Mournes and Slieve Croob Area of Outstanding Natural Beauty. Development proposals in rural areas will be considered under PPS21. Impact on the AONB will be considered under PPS2.

The principle of development proposals in rural areas must first be assessed against **PPS21 – Sustainable Development in the Countryside**. Policy CTY1 states that a range of types of development are acceptable in principle in the countryside. This includes tourism development if in accordance with the TOU policies of the Planning Strategy for Rural Northern Ireland. As the TOU policies have now been superseded by the final version of **PPS16 – Tourism** (published June 2013), the principle of the scheme must be considered under that policy.

The main consideration is **policy TSM6**. As the equivalent section in the SPPS (paragraph 6.260) is less specific, the retained policy TSM6 will be given substantial weight in determining the application in accordance with paragraph 1.12 of the SPPS. Planning permission will be granted for a new holiday park where it is

demonstrated that the proposal will create a high quality and sustainable form of tourism development. The location, siting, size, design, layout and landscaping of the holiday park proposal must be based on an overall design concept that respects the surrounding landscape, rural character and site context. It is the planning department's view that this proposal is not a high quality or sustainable form of tourism development. It is poorly laid out with limited landscaping and the pitches have been crammed onto the site. These deficiencies will be explored further under the specific policy criteria below:

- a) The landscape setting of the site is dramatic and it will be visible in the wider area, particularly from Kilbroney Road to the west. However, the backdrop of rising land to the east and the presence of existing mature trees means that the site can in principle accommodate some form of tourism development. The scale of holiday park proposed would harm the visual amenity and rural character of the area, though a reduced scheme with better landscaping could be satisfactorily absorbed into the landscape.
- b) If all existing trees can be retained, they would be an effective means of integrating the proposed development, with the assistance of some new landscaping. A survey of existing trees and a detailed specification of new landscaping have been requested since February 2013 and the agent has failed to provide it. Therefore it has not been demonstrated that criteria (b) has been met.
- c) Adequate provision (normally around 15% of the site area) should be made for communal open space (including play and recreation areas and landscaped areas), as an integral part of the development. Much of the indicated open space in this scheme doubles as tent pitching space and is located at the steep margins of the site. This would be unsuitable for playing ball games on and would not meet the above test. A quality central area of flatter ground would need to be provided.
- d) The layout of caravan pitches should be informal and characterised by discrete groupings or clusters of units separated through the use of appropriate soft landscaping. More detailed guidance in Appendix 4 of the policy recommends the avoidance of 'regimented' rows of units that typically result in a detrimental visual impact (a 'sea' of caravans effect). It further states that long straight lines of roads and paths should be avoided. This proposal is the opposite of good practice and will result in a sea of caravans in long straight rows with virtually no landscaping between them. The pitches at only 6m long and 3m wide would barely accommodate modern caravans which can be up to 7m long, and they are so close together that there would be insufficient room for awnings or the safe parking of a towing car off the roadway, aside from the adverse amenity impacts of having units so close together. The pitches are crammed onto the site and would need to be at least halved in number to provide a decent level of space around each one. The best sites would provide individually hedged plots with room for a caravan, awning, car and play space, and each with its own water and sewage connection. Tent pitching areas should be relatively flat, but those proposed here are on the steep margins of the site and would be very difficult to pitch a tent or set up a cooker on. No parking provision has been shown for visitors with tents. Overall, the layout is of poor quality and would not provide conditions that would attract tourists to the area.



- e) The design of the ancillary buildings is poor. They all have full- or half-hipped roofs and timber clad walls. These are not traditional to the Mourne area where roofs are normally gable pitched and walls are rendered. It appears that available design guidance for the area has not been consulted. The formal straight lines of the internal road network and the lack of detail on car parking and boundary treatments are also contrary to this criterion.
- f) The main environmental assets of the site are the mature trees. Despite several requests for information over almost 4 years, the agent has not demonstrated how these will be retained and integrated in a suitable manner into the overall design and layout.
- g) Mains water and sewerage services are available to serve the site.

In summary, the proposal is contrary to criteria (a) – (f) of this policy. Therefore it remains unacceptable in principle as development in the countryside under policy CTY1.

The proposed holiday park also includes two log cabin self-catering units. These must be assessed under **policy TSM5**. It permits three possible circumstances where self-catering units will be acceptable in the countryside:

- (a) one or more new units all located within the grounds of an existing or approved hotel, self-catering complex, guest house or holiday park;
- (b) a cluster of 3 or more new units to be provided at or close to an existing or approved tourist amenity that is / will be a significant visitor attraction in its own right;
- (c) the restoration of an existing clachan or close, through conversion and / or replacement of existing buildings, subject to the retention of the original scale and proportions of the buildings and sympathetic treatment of boundaries.

As there is no existing holiday park at this location, there are only two units proposed and it does not involve conversion or replacement of buildings, the proposal does not meet any of the circumstances where it would be acceptable. This element is contrary to policy TSM5.

Tourism development proposals are also subject to the design and general criteria in **policy TSM7**:

#### Design criteria

- (a) There are no particular issues with movement pattern and the location of the site will encourage customers to walk in the Mourne. The nearest public transport is in Rostrevor village.
- (b) The site layout, building design, and landscaping arrangements are unsatisfactory as discussed above. Details of external lighting were requested, but were not provided.
- (c) The agent has not provided sufficient detail of boundary treatments and means of enclosure.
- (d) Caravan pitches will be surfaced with permeable grasscrete so there will be no significant increase in surface water runoff. A Drainage Assessment was requested but has not been provided.
- (e) The lack of enclosure to individual pitches does not deter crime or promote a feeling of security for campers.
- (f) Not applicable as there is no public art in the proposal.

### General criteria

- (g) Surrounding land uses include a joinery works and Builders' Suppliers. These are likely to generate a level of noise during working hours, though Environmental Health did not raise concerns in this regard. As the previous planning authority and now the Council have accepted the principle of some form of tourism use on the site, the proposal should not be refused on this basis, or the similar requirement in **PPS4 (policy PED8)**.
- (h) The proximity of the development to Nos. 48A and 52 could harm their residential amenity through noise and overlooking (there are tent spaces on the slope above the new dwelling). The layout should be reviewed to provide a greater distance and buffer planting between the site and the dwellings. There is also potential for the hydro turbine to harm amenity through noise, though no details of the turbine or its sound power output have been submitted.
- (i) There should be no adverse effects on built heritage features on the site. However, it has not been demonstrated that the proposal will provide adequate fish passage arrangements or not harm protected habitats and species.
- (j) Mains sewerage is available and the proposed sewage can be accommodated at the nearest WwTW.
- (k) The new access at the NE corner of the site is to be used. In accordance with published guidance in PPS3 and DCAN15, the plan states that visibility splays of 4.5m x 70m will be provided.
- (l) TransportNI requires Newtown Road to be widened to 5.5m along the site frontage and drainage details to be provided. The road improvements suggested would improve road safety for all road users, though the agent has failed to provide an amended layout to show these details. Until this information is provided, the proposal remains contrary to **policy AMP2 of PPS3**.
- (m) additional vehicular traffic generated by the proposal can be handled safely by the existing road network provided the access improvements are carried out prior to commencement of development.
- (n) the Newtown Road is not a protected route.
- (o) the proposal does not constrain access to the coastline or tourism assets.

In summary, the proposal is contrary to several criteria in policy TSM7.

As development in the countryside, the proposal is subject to the design and integration criteria in PPS21. **Policy CTY13** deals with Integration and Design of Buildings in the Countryside. The planning department do not consider that a tourism development on this scale can be visually integrated into the surrounding landscape. It would be a prominent feature in the landscape, particularly when viewed from Kilbroney Road. The site lacks sufficient means of enclosure to provide a suitable degree of integration, it would rely primarily upon new landscaping for integration and ancillary works (roads, hard surfaces and overall cut and fill operations that would dramatically alter the site's existing contours) do not integrate with their surroundings. Overall, the development would fail to blend with the landform, existing trees, buildings, slopes or other natural features that would form a backdrop. The design of the ancillary buildings is poor. They all have full- or half-hipped roofs and timber clad walls. These are not traditional to the Mourne area where roofs are normally gable pitched and walls are rendered. It appears that available design guidance for the area has not been consulted. The proposal is therefore contrary to criteria a, b, c, d, e and f of Policy CTY 13. If the scale of the scheme was reduced

and additional landscaping introduced between plots, these concerns may be overcome.

**Policy CTY14** concerns impact on rural character. It states that "Planning permission will be granted for a building in the countryside where it does not cause a detrimental change to, or further erode the rural character of an area". It is considered that the proposal as it stands would, if permitted, cause a detrimental change and erosion to the rural character of this area. In its totality, the development would appear unduly prominent in the landscape. It would fail to respect the traditional pattern of settlement exhibited in this area and the impact of ancillary works would have a detrimental impact on the rural character of this area. Development would also appear to be extended along Newtown Road and the proposal would lead to the creation of a ribbon of development. On balance, the proposal would fail to meet the requirements of criteria a, c, d and e in particular. In relation to criteria b, while the proposal would result in a significant build-up of development in combination with the sheds and other dwellings, this is not considered to be suburban.

Linked to the above visual tests is **policy NH6 of PPS2** regarding new development within Areas of Outstanding Natural Beauty. The proposal has failed to be sensitive to the special character of this AONB in terms of the layout and the design of the buildings (which do not use typical local materials or respect traditional architectural styles and patterns). The proposal is judged to have a detrimental impact on this part of the AONB and the scale of the development is inappropriate.

A micro hydro power plant is proposed to be included within the development. This plant is ancillary to the overall development however it will operate in an SLNCI, and has potential to adversely affect nature conservation interests. As there is no significant change to the policy requirements for renewable energy schemes following the publication of the SPPS and it is arguably less prescriptive, the retained policy of PPS18 will be given substantial weight in determining the principle of the proposal in accordance with paragraph 1.12 of the SPPS. **Policy RE 1 of PPS18** states that development that generates energy from renewable resources will be permitted provided the proposal, and any associated buildings and infrastructure, will not result in an unacceptable adverse impact on five listed criteria:

- (a) This proposal will not cause any harm to human health or public safety. In order to assess the potential noise impact of the turbine on residential amenity, Environmental Health requested details of the turbine type and its sound power output. The agent has failed to provide this information. Therefore it has not been demonstrated that residential amenity will not be adversely affected.
- (b) The micro hydro power plant will not affect the visual amenity or the character of the area as much of the technology is underground. The only significant visual impact will be a small pump house and it will be in a low-lying section of the site detached from public views.
- (c) The development will not impact on any built heritage interests. However, it is likely to cause harm to biodiversity and nature conservation interests. The area is a habitat for European protected species including otters and bats and the river also supports migratory fish. An otter survey was submitted in August 2014 and notes the presence of otter holts and other activity in the area. The intake point of



the hydro system is only 5m from a holt. The report recommended that it is moved at least 30m away to ensure no adverse impact on the protected species. The agent has failed to provide an amended plan to this effect. Also, no information has been provided regarding the impact on existing trees along the riverbank which are used by bats. A bat survey would be required if there is any impact on existing trees, but has not been provided. NIEA also require details of external lighting. The abstraction of water from the river will have implications for fish passage and no detail has been given on the nature of the concrete weir structures required to remove and return water from and to its normal course, including the possible use of screening grills. The proposal is contrary to this criterion, and also **policy NH2 of PPS2** in that it could harm European Protected species. With regard to policy NH1, there is a hydrological linkage to a European site (Carlingford Lough SPA). The potential impact of this proposal was assessed in accordance with the requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended) by Shared Environmental Services on behalf of the Council. The proposal would not be likely to have a significant effect on the features of any European site.

- (d) Water Management Unit had no objections regarding effects on the surface water environment, subject to the applicant following standard advice and obtaining an Abstraction and Impoundment licence. However, Loughs Agency had some concern about deleterious matter entering the watercourse. This could be addressed in an updated Construction Method Statement. Provided good practice is followed, the hydro scheme should not harm water quality in the river.

- (e) This part of the proposal will not impact on public access to the countryside.

The environmental benefits of this clean energy project are not considered to overcome the nature conservation concerns with the scheme.

Part of the site is within the fluvial flood plain of the Kilbroney River. A Flood Risk Assessment is required in accordance with **policy FLD1 of PPS15**. The agent has not provided this information. Without it, the scheme is contrary to policy and should be refused based on the flood risk to the new development and development elsewhere.

A Drainage Assessment is also required under **policy FLD3** due to the size of the site and the potential for increased surface water runoff. The agent has failed to provide the necessary information. Therefore the scheme is contrary to policy FLD3.

In addition to the above reasons, the on-going failure of the agent to provide information necessary to determine the application should be listed as a further refusal reason.

In summary, the planning department will accept a smaller scale tourism park on the site with appropriate layout, design and landscaping, however, substantial changes are required to the scheme to meet the relevant policies and the agent has failed to supply any new information.

**Recommendation:** Refusal

**Refusal Reasons:**

1. The proposal is contrary to Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
2. The proposed log cabins are contrary to Policy TSM5 of Planning Policy Statement 16 - Tourism, because they are not within the grounds of an existing or approved hotel, self-catering complex, guest house or holiday park, there are not 3 or more new units close to an existing or approved tourist amenity that is a significant visitor attraction in its own right, and it does not involve the restoration of an existing clachan or close, through conversion and / or replacement of existing buildings.
3. The proposed holiday park is contrary to Policy TSM6 of Planning Policy Statement 16 - Tourism, because the scale of the development would have an adverse impact on the visual amenity and rural character of the area, it has not been demonstrated that effective integration into the landscape can be secured primarily through the utilisation of existing natural features, there is inadequate provision for communal open space, the layout of caravan pitches represents cramming and is not informal or discrete, the design of ancillary buildings does not reflect local traditions of form, materials and detailing, it has not been demonstrated that the environmental assets of the site can be retained and integrated in a suitable manner into the overall design and layout, and it is therefore not a high quality and sustainable form of tourism development.
4. The proposal is contrary to Policy TSM7 of Planning Policy Statement 16 - Tourism, with regard to criteria b (layout and design), c (boundary treatments), d (drainage), e (designing out crime), h (effects on residential amenity), i (impact on natural heritage), and l (road safety), and therefore would not represent a satisfactory and sustainable form of tourism development.
5. The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the development would be a prominent feature in the landscape, the proposed site is unable to provide a suitable degree of enclosure for the proposal to integrate into the landscape, the proposal relies primarily on the use of new landscaping for integration, the ancillary works do not integrate with their surroundings, the design of the proposal is inappropriate for the site and its locality, the proposal fails to blend with the landform, existing trees, buildings, slopes and other natural features which provide a backdrop and therefore would not visually integrate into the surrounding landscape.
6. The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the development would, if permitted, be unduly prominent in the landscape, would not respect the traditional pattern of settlement exhibited in the area, would create a ribbon of development, the impact of ancillary works would damage rural character, and would therefore result in a detrimental change to the rural character of the countryside.

7. The proposal is contrary to paragraph 6.187 of the Strategic Planning Policy Statement for Northern Ireland Policy NH6 of the Department's Planning Policy Statement 2, Natural Heritage, in that the site lies in a designated Area of Outstanding Natural Beauty and the siting and scale of the proposal is inappropriate for the locality, the proposed buildings do not respect traditional architectural styles and patterns, and it is not sympathetic to the special character of the Mourne AONB.
8. The proposal is contrary to Policy NH 2 of Planning Policy Statement 2: Natural Heritage in that the site is used by otters and potentially by bats. The applicant has failed to amend the design in response to the recommendations of the otter survey and has not demonstrated how the proposal will avoid impacting on bats, or on the nature conservation value of the river corridor.
9. The proposal is contrary to paragraph 6.224 of the Strategic Planning Policy Statement for Northern Ireland and policy RE 1 of Planning Policy Statement 18: Renewable Energy, in that it has not been demonstrated that the proposed micro hydropower system would not result in an adverse impact on biodiversity or nature conservation interests.
10. The proposed development is contrary to Policy AMP 2 of Planning Policy Statement 3: Access, Movement and Parking, in that it has not been demonstrated that the applicant can achieve a satisfactory means of access to and egress from the site, and the development would therefore prejudice the safety and convenience of road users and pedestrians.
11. The proposal is contrary to Policy FLD 1 of Planning Policy Statement 15: Planning and Flood Risk, in that the site lies within the fluvial flood plain of the Kilbroney River and it has not been demonstrated that the proposal is an exception to the policy, or that a Flood Risk Assessment has been undertaken to identify all sources of flood risk to and from the proposed development and that there are adequate measures to manage and mitigate any increase in flood risk arising from the development.
12. The proposal is contrary to Policy FLD 3 of Planning Policy Statement 15: Planning and Flood Risk, in that the site exceeds 1 hectare and it has not been demonstrated through a Drainage Assessment that adequate measures will be put in place to effectively mitigate the flood risk from surface water to the proposed development and development elsewhere.
13. Having notified the applicant under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that additional information is required to allow the Council to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.



**Case Officer Signature:**

**Date:**

**Appointed Officer Signature:**

**Date:**

- and I (road safety), and therefore would not represent a satisfactory and sustainable form of tourism development.
- 5 The proposal is contrary to Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the development would be a prominent feature in the landscape, the proposed site is unable to provide a suitable degree of enclosure for the proposal to integrate into the landscape, the proposal relies primarily on the use of new landscaping for integration, the ancillary works do not integrate with their surroundings, the design of the proposal is inappropriate for the site and its locality, the proposal fails to blend with the landform, existing trees, buildings, slopes and other natural features which provide a backdrop and therefore would not visually integrate into the surrounding landscape.
  - 6 The proposal is contrary to Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the development would, if permitted, be unduly prominent in the landscape, would not respect the traditional pattern of settlement exhibited in the area, would create a ribbon of development, the impact of ancillary works would damage rural character, and would therefore result in a detrimental change to the rural character of the countryside.
  - 7 The proposal is contrary to paragraph 6.187 of the Strategic Planning Policy Statement for Northern Ireland Policy NH6 of the Department's Planning Policy Statement 2, Natural Heritage, in that the site lies in a designated Area of Outstanding Natural Beauty and the siting and scale of the proposal is inappropriate for the locality, the proposed buildings do not respect traditional architectural styles and patterns, and it is not sympathetic to the special character of the Mourne AONB.

**ITEM NO** D5  
**APPLIC NO** P/2013/0078/F Full **DATE VALID** 1/25/13  
**COUNCIL OPINION** REFUSAL  
**APPLICANT** Mervyn Hamilton **AGENT** Newline Architects  
 48 Main Street  
 Castledawson  
 BT45 8AB  
 028 79468396

**LOCATION** 420m North West of 20 Levin Road  
 Newtownhamilton

**PROPOSAL** Erection of 1 no 250KW Wind Turbine with a hub height of 30m.

REPRESENTATIONS	OBJ Letters	SUP Letters	OBJ Petitions	SUP Petitions					
	2	0		0					0
					Addresses		Signatures		
					0	0	0	0	

- 1 The proposal is contrary to the Strategic Planning Policy Statement for Northern Ireland and policy RE 1 of Planning Policy Statement 18: Renewable Energy (criteria (a) and (vi)) in that the proposed turbine would adversely affect the residential amenity of future occupants of an approved site to the west of the wind turbine by reason of noise and shadow flicker.
- 2 Having notified the agent under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that further details were required with regard to the financial interest of planning ref P/2013/0064/O which were required to allow the Council to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.





Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Application Reference:** P/2013/0078/F

**Date Received:** 25.01.2013

**Proposal:** Erection of 1 no 250KW Wind Turbine with a hub height of 30m.

**Location:** 420m North West of 20 Levin Road, Newtownhamilton. The site is situated approximately 1.2 miles north west of Belleeks in the South Armagh countryside.

**Site Characteristics & Area Characteristics:**

The proposed site is in a hollow when viewed from Outleckan Road to the east however it occupies a very elevated position in the landscape due to the steep nature of the topography which falls towards the north east. Nonetheless, views from public roads that lie in this direction (Carrickgollogly Road and Levin Road) are largely restricted because of the undulating topography of the landscape and it is almost impossible to view the site from vantage points along these public roads. The land to the south west of the site rises up steeply and provides a backdrop for any potential views from these lower vantage points.

**Site History:**

There is no planning history on this site however permission was granted in July 2012 for a 30 metre high turbine approx 300 metres to the north of this site. Since the application was submitted, an earlier planning application for a dwelling on a farm under planning ref P/2013/0046/F on a site opposite and 250 metres to the west of the proposed turbine location was approved on 18/07/13. This approved site will be considered as a sensitive receptor in the discussion below.

**Planning Policies & Material Considerations:**

Strategic Planning Policy Statement for Northern Ireland

Banbridge Newry and Mourne Area Plan 2015.

Planning Policy Statement 2 Natural Heritage

Planning Policy Statement 3 Access, Movement and Parking

Planning Policy Statement 18: Renewable Energy, Supplementary Planning Guidance: Wind Energy Development in Northern Ireland's Landscapes

PPS 21: Sustainable Development in the Countryside,

DCAN 15: Vehicular Access Standards

**Consultations:**

NIEA Protecting Historic Monuments – No objection  
 N.I Water – Windfarms – No objection  
 Belfast International Airport - No objection  
 Ofcom Northern Ireland – no objection raised  
 National Air Traffic Services – no objection  
 Env Health Newry and Mourne District Council –No objection based on the nearest 'non associated property'  
 UK Crown Bodies - D.I.O. Safeguarding - No objection  
 Arqiva Services Limited - No objection  
 The Joint Radio Company - No objection  
 P.S.N.I. Information and Communications Services - No objection  
 Natural Heritage – no objections  
 UK Crown Bodies - D.I.O. - No objection  
 Transport NI - Downpatrick Office – acceptable in policy terms.

**Objections & Representations**

2 neighbours notified on 25.09.2015. Application Advertised on 15.02.2013. 2 objection letters received and a miscellaneous letter also received. These will be dealt with in more detail below under the consideration and assessment.

**Consideration and Assessment:**

Strategic Planning Policy Statement / Banbridge Newry and Mourne Area Plan 2015  
 The Strategic Planning Policy Statement is a material consideration for this application however as there is no significant change to the policy requirements for wind turbines following the publication of the SPPS and it is arguably less prescriptive, the retained policy of PPS18 will be given substantial weight in determining the principle of the proposal in accordance with paragraph 1.12 of the SPPS / BNMAP 2015. The site lies within the Rural Area as designated in the Banbridge Newry and Mourne Area Plan 2015. There are no objections with regard to the Area Plan.

PPS2: Natural Heritage. NIEA Natural Heritage comments dated 21st February 2013 state that they have no objection to the proposed development. There will be no potential for impact upon any protected species. The site is located adjacent to the buffer for a Cairn ARM:029:011 however NIEA PHM have no objection to the proposed development.

PPS3: Transport NI has confirmed they have no objections to the proposal.

PPS21: CTY1 (Development in the Countryside) - See consideration of PPS18

## PPS18: RE 1 (Renewable Energy Development)

## a) Public safety, human health or residential amenity;

There is in excess of 400 metres between the proposed site and the nearest occupied dwelling and farm grouping to the east. Given the undulating nature of the landscape, I believe that this is sufficient separation to ensure that public safety is not unduly impacted on. The impact upon the prospective residents of the site approved under application P/2013/0046/O is a material consideration. The approved siting position is 250 metres from the proposed turbine. This is within the 300 metre radius for noise and shadow flicker. Whilst information was received that suggests a financial interest may exist for this potential dwelling, its credibility has also been challenged. In the interests of clarity the agent was requested via email to send a solicitors letter to confirm the financial interest on 3rd November 2016 – giving 2 weeks to respond. This information has not been received. Whilst it is noted that Environmental Health have responded with no objections, this is based on 'non associated' residential dwellings. In the absence of irrefutable documentation to confirm a financial interest in the site mentioned above this application does not meet the policy criteria due to a lack of information.

## b) Visual amenity and landscape character;

The site is located in the Carrigatuke Hills Landscape Character Area as identified in the supplementary guidance to PPS18. This area has been identified as having an overall medium sensitivity with regards to wind turbine development. The landscape (as described above) is very undulating with rising land to the rear of the site. Views from the surrounding public roads are very restricted due to the elevated nature of the landscape and dense roadside vegetation.

I believe that this site is capable of absorbing a wind turbine of this size without any significant visual harm to the landscape.

## c) Biodiversity, nature conservation or built heritage interests;

No impact.

## d) Local natural resources such as air quality and water quality;

No impact

## e) Public access to the countryside;

There is no public access at this site as surrounding lands are private.

(i) That the development will not have an unacceptable impact on visual amenity or landscape character;

This proposal is for one turbine with a hub height of 30 metres, there is another wind turbine approved approx 300 metres to the north of this site along Outleckan Road. The proposal is located within a very undulating landscape and given the nature of



the landscape, any potential views of the turbine will be for short distances along Levin Road and Carrickgollogly Road. From these vantage points, the rising land to the rear will provide a backdrop for any potential views of the proposed turbine(s). I do not consider that there will be any unacceptable impact upon the landscape.

(ii) that the development has taken into consideration the cumulative impact of existing wind turbines;

Within the immediate area of the site there is 1 existing approval for a wind turbine (reference P/2011/0699/F) to the north of the application site, there are no other proposals for wind turbines within the vicinity of the site apart from the current proposal and the existing approval at this location therefore there is no major concerns regarding cumulative impact.

The impact of both of these turbines will not be unacceptable in terms of visual amenity and will not have a detrimental impact upon the character of the surrounding landscape.

(iii) that the development will not create a significant risk of landslide or bog burst;

The site is on improved agricultural land, so the risk of landslide or bog burst at this location is not significant.

(iv) that no part of the development will give rise to unacceptable electromagnetic interference to communications installations;

No objections have been raised by consultees in relation to interference with communication systems.

(v) that no part of the development will have an unacceptable impact on roads, rail or aviation safety;

Transport NI has no objection to the access.

Belfast International Airport and NATS have no objections; proposals will not adversely impact on road, rail or aviation safety.

(vi) that the development will not cause significant harm to the safety or amenity of any sensitive receptors

(vii) that above-ground redundant plant (including turbines), buildings and associated infrastructure shall be removed and the site restored to an agreed standard appropriate to its location.

A planning condition could be attached to control this.

## Representations

1. An objection was received from the owners of the approved site on 28th August 2013. They state that the proposed turbine is in proximity to their approved site and would adversely affect public safety, human health, residential amenity, natural beauty of the area and local noise levels. They also refer to potential health conditions the turbine could cause.

I have considered above that the turbine would not adversely affect public safety or human health, and that the local landscape could accommodate a turbine of this size without loss of landscape character. However, I agree that the residential amenity of the new dwelling could be adversely affected by noise and shadow flicker. The agent has failed to demonstrate that this will not be the case. There is no medical evidence specific to this proposal with reference to the conditions outlined in the letter. However, the noise issue is material and the turbine cannot be approved on the basis of the information submitted to date. The issue of noise impact on the residential amenity of the objectors is material and is given significant weight.

2. A letter has been received from Niall Courtney who has disputed the validity of the letter from Mr McCann (reported original owner of site P/2013/0046/O) that states he has a financial interest in the wind turbine. On receipt of this information and given the proximity the potential site is to the wind turbine it was considered that to offer clarity on the situation a solicitors letter on behalf of Mr McCann should be submitted from the agent to erase any ambiguity. Whilst this information was sought, it has not been received.

3. Letter of objection from George Clarke dated 28th August 2015. Mr Clarke alleges that the financial interest that has been registered on file to Mr McCann does not satisfy the definition of financial interest in case law. As the financial interest has not been confirmed by a solicitor or similar it cannot be critiqued in full. However it is noted the judge makes reference to compensation and electricity costs/supply – not a yearly income which was documented in the original financial interest letter.

## **Recommendation:**

Refusal

## **Refusal Reasons**

1. The proposal is contrary to the Strategic Planning Policy Statement for Northern Ireland and policy RE 1 of Planning Policy Statement 18: Renewable Energy (criteria (a) and (vi)) in that the proposed turbine would adversely affect the residential amenity of future occupants of an approved site to the west of the wind turbine by reason of noise and shadow flicker.

2. Having notified the agent under Article 3 (6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015 that further details were required with regard to the financial interest of planning ref P/2013/0064/O which

were required to allow the Council to determine the application, and having not received sufficient information, the Council refuses this application as it is the opinion of the Council that this information is material to the determination of this application.

3. The proposal is contrary to the Strategic Planning Policy Statement and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.

**Case Officer:**

**Authorised Officer:**



Planning Policy Division



Department for

**Infrastructure**

An Roinn

**Bonneagair**

[www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk)

Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB  
Tel: 0300 200 7830

8<sup>th</sup> December 2016

Dear Sir/Madam

**CONSULTATION ON PERMITTED DEVELOPMENT RIGHTS FOR MINERAL EXPLORATION**

I am writing to inform you that the Department for Infrastructure has issued a consultation paper on proposals to amend permitted development rights in respect of mineral exploration.

The purpose of the consultation is to obtain views on the Department's proposals for amending permitted development rights, including removing permitted development rights for petroleum exploration from Class A of Part 16 of the Schedule to the Planning (General Permitted Development) Order (Northern Ireland) 2015.

Copies of the Consultation Paper may be downloaded from the Planning Portal website at [www.planningni.gov.uk](http://www.planningni.gov.uk) or the Departmental website at [www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk). Alternatively you can request a copy by telephone: (028) 90540571(text relay prefix 18001); by email: [ppdconsultations@infrastructure-ni.gov.uk](mailto:ppdconsultations@infrastructure-ni.gov.uk) or from the postal address below.

Review of Permitted Development Rights Consultation  
Planning Policy Division  
Room 1-18  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

The closing date for the receipt of comments is 3<sup>rd</sup> February 2017.

Yours faithfully,



E-mail: [planning@infrastructure-ni.gov.uk](mailto:planning@infrastructure-ni.gov.uk)  
Website: [www.planningni.gov.uk](http://www.planningni.gov.uk)

**ANGUS KERR**

Planning Policy Division  
Department for Infrastructure  
Planning Policy Division  
Room 1-01  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

Planning Policy Division



Department for

**Infrastructure**

An Roinn

**Bonneagair**

[www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk)

Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB  
Tel: 0300 200 7830

15 December 2016

Dear Sir/Madam

**CONSULTATION ON ENVIRONMENTAL IMPACT ASSESSMENT AMENDMENT DIRECTIVE**

I am writing to inform you that the Department for Infrastructure has issued a consultation paper on proposals to amend the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015.

The purpose of the consultation is to obtain views on the Department's proposals for transposing and implementing European Directive 2014/52/EU, amending Directive 2011/92/EU on the effects of certain public and private projects on the environment.

Copies of the Consultation Paper may be downloaded from the Planning Portal website at [www.planningni.gov.uk](http://www.planningni.gov.uk) or the Departmental website at [www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk). Alternatively you can request a copy by telephone: (028) 90540572(text relay prefix 18001): by email: [ppdconsultations@infrastructure-ni.gov.uk](mailto:ppdconsultations@infrastructure-ni.gov.uk) or from the postal address below.

EIA Amendment Directive 2014/52/EU Consultation  
Planning Policy Division  
Room 1-18  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

The closing date for the receipt of comments is 9<sup>th</sup> February 2017.

Yours faithfully,



E-mail: [planning@infrastructure-ni.gov.uk](mailto:planning@infrastructure-ni.gov.uk)  
Website: [www.planningni.gov.uk](http://www.planningni.gov.uk)



**ANGUS KERR**

Department for Infrastructure  
Planning Policy Division  
Room 1-01  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

<b>Report to:</b>	<b>Planning Committee</b>
<b>Subject:</b>	Newry, Mourne and Down Draft Statement of Community Involvement
<b>Date:</b>	2 February 2017
<b>Reporting Officer:</b>	Anthony McKay, Chief Planning Officer
<b>Contact Officer:</b>	Andrew Hay, Principal Planning Officer

### **Decisions Required**

Note the content of this report.

#### **1.0 Purpose & Background**

- 1.1 The purpose of this report is to provide Members with a draft of the Statement of Community Involvement (SCI) which outlines how the Council proposes to engage the community and stakeholders in exercising its planning functions. The draft SCI was presented to the SPR Committee on 19/1/17 for agreement. The Planning Committee was invited to the SPR Committee on 19/1/17 in the consideration of the report on the draft SCI.
- 1.2 The publication of an SCI is required under Stage 1: Initial Plan Preparation as part of the Local Development Plan process. While the SCI addresses all the planning functions, including Development Management and Planning Enforcement, in relation to the Local Development Plan (LDP), the Council has a statutory requirement to have an agreed SCI in place before it can consult on its 'Preferred Options Paper', which will be the first formal publication as part of the LDP process.
- 1.3 The Planning (Statement of Community Involvement) Regulations (Northern Ireland) 2015 state that before preparing an SCI the Council must also consider whether it is appropriate to invite representations from persons who have an interest in development in the District. If public consultation is undertaken on the SCI then the Council must also take into account any representations received before the document is sent to the Department for Infrastructure for its agreement.
- 1.4 Officers consider it would be appropriate for the Council to invite representations on its SCI and sought the agreement of the SPR Committee to carry out this discretionary public consultation by attracting community participation over a 4 week period using the following measures:
- Place a copy of the draft SCI on the Council's website.
  - Place a notice in local newspapers for 2 consecutive weeks.
- 1.5 Following completion of the consultation period Officers will analyse and take account of the responses received before presenting the final version of the SCI for Members' agreement. Subject to receiving that agreement, the SCI will then be sent to the Department for Infrastructure who have 4 weeks to comment.

The Draft SCI was presented to the SPR Committee on 19/1/17 for agreement on the following:

- The draft Statement of Community Involvement.

- That the draft SCI be subject to a 4 week public consultation period during which representations will be invited using the following measures:
  - the draft SCI be published on the Council website for a 4 week period.
  - a notice be placed in the local press for 2 consecutive weeks.

## 2.0 **Key Issues**

2.1 The attached draft SCI explains how the community and stakeholders will be involved in the preparation of the Local Development Plan as well as Development Management and Planning Enforcement.

2.2 The draft SCI sets out the steps that the Council will take to facilitate community involvement and sets out the vision and strategy for involving the community and stakeholders at various stages of the planning process.

2.3 The draft SCI sets out the standards to be met by a Council in terms of the community involvement, building upon the minimum requirements set out on both the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 and the Planning (Statement of Community Involvement) Regulations (Northern Ireland) 2015. The document has been prepared in accordance with the DOE guidance 'Development Plan Practice Note 2: Statement of Community Involvement' (Version 2: August 2015)

2.4 The document outlines the following:

- The background and purpose of the SCI.
- Why planning is important.
- The principles and benefits of community Involvement.
- Alignment to the Community Plan.
- How and when the community can engage in:
  - The LDP
  - Development Management.
  - Planning Enforcement.
- The opportunity for community involvement in other planning functions:
  - Supplementary Planning Guidance.
  - Conservation Area designation.
  - Simplified Planning Zone Area designation.

2.5 It is intended to provide a proactive and timely approach to community involvement through a process of providing clear information and encouraging participation during plan preparation and planning application submission, assessment and determination.

## 3.0 **Recommendations**

3.1 Members are requested to note the content of this report.

## 4.0 **Resource Implications**

4.1 N/A

## 5.0 **Equality Assessment**

The draft SCI has taken account of the Council's Equality Scheme. Para 3.2.6 of the Equality Scheme states that a consultation period should last for a minimum of 12 weeks. However, in exceptional circumstances, the Council may shorten timescales to 8 weeks or less. Given the timeframe for the preparation of the LDP, and as consultation on the SCI is not a statutory requirement, a consultation period of 4 weeks is considered adequate.

## 6.0 **Appendices**

- Draft Statement of Community Involvement





Comhairle Ceantair  
**an Iúir, Mhúrn  
agus an Dúin**

**Newry, Mourne  
and Down**  
District Council

## **Statement of Community Involvement**

A guide to community engagement in the planning process

**January 2017**

**Consultation Draft**

## Responding to this Consultation Document

### How to Respond

You are invited to send your views on this draft Statement of Community Involvement. Comments should reflect the structure of the document as far as possible with references to paragraph numbers where relevant.

All responses should be in writing and submitted to us no later than the xx xxx 2017 in one of the following ways:

By email: [planning@nmandd.org](mailto:planning@nmandd.org)

By post to: Development Plan Team  
Newry, Mourne and Down District Council  
Downpatrick Office  
Downshire Civic Centre  
Downshire Estate, Ardglass Rd  
Downpatrick BT30 6GQ

We look forward to receiving responses to the proposals and issues raised with this consultation document. Your representations will be made public. We will publish your name and organisation however we will not publish information we consider sensitive, including your address, email address and telephone number.

Additional copies of the consultation document can be downloaded from our website at [www.nmandd.org](http://www.nmandd.org) or requested via the postal address, email as above, or by telephone on 0300 013 2233.

To ensure equality of opportunity in accessing information, copies of this document in alternative formats are available on request. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

If you have any queries regarding this document please contact us using the details above.

### Advisory Note:

This Statement of Community Involvement in the Planning process is not intended to be a source of definitive legal advice. Reference should be made to the actual legislation referred to in this statement and if any discrepancy exists the provisions of the legislation will prevail.

<b>Contents</b>	<b>Page</b>
<b>1.0 Introduction.....</b>	<b>4</b>
Our Statement of Community Involvement: Background and Purpose .....	4
Why is Planning Important? .....	4
A Vision of Participation .....	5
Principles of Community Involvement .....	5
What are the benefits of community involvement? .....	6
Alignment to the Community Plan .....	6
Review of the Council’s SCI .....	6
<b>2.0 The Local Development Plan .....</b>	<b>7</b>
Purpose, Structure and Process .....	7
Who can get involved? .....	8
Empowering disadvantaged and under-represented groups .....	8
How and when will the community will be involved .....	9
Next Steps .....	9
<b>Stages in the LDP Process</b>	
<u>Stage 1</u> : Data Collection .....	9
<u>Stage 2</u> : Formal Notice of LDP Preparation .....	10
<u>Stage 3</u> : Publication of draft Plan Strategy .....	12
<u>Stage 4</u> : Public Inspection of Representations received to the draft Plan Strategy	13
<u>Stage 5</u> : Submission of the Plan Strategy (and associated documents) for	
Independent Examination .....	14
<u>Stage 6</u> : Independent Examination of the draft Plan Strategy .....	15
<u>Stage 7</u> : Adoption of Plan Strategy .....	16
<u>Stage 8</u> : Publication of the draft Local Policies Plan .....	17
<u>Stage 9</u> : Public Inspection of Representations received to the draft Local Policies	
Plan.....	18
<u>Stage 10</u> : Submission of the Local Policies Plan (and associated documents) for	
Independent Examination .....	19
<u>Stage 11</u> : Independent Examination of the draft Local Policies Plan.....	20
<u>Stage 12</u> : Adoption of Local Policies Plan .....	20
Next Steps .....	21



<b>3.0</b>	<b>Development Management .....</b>	<b>22</b>
	Purpose .....	22
	Pre-Application Stage .....	23
	Application Stage .....	24
	Obtaining further information and getting involved in planning applications .....	26
	Community Involvement at the Planning Committee Stage .....	28
	Pre-determination Hearings and Speaking at the Planning Committee .....	28
	Post Application Stage .....	29
	Community Involvement after a Planning Application has been determined .....	29
	Community Involvement in Planning Appeals .....	29
<b>4.0</b>	<b>Planning Enforcement .....</b>	<b>31</b>
<b>5.0</b>	<b>Community Involvement in Other Planning Functions .....</b>	<b>32</b>
	Community involvement in Supplementary Planning Guidance .....	32
	Community Involvement in Conservation Area Designation .....	32
	Community Involvement in the Designation of Simplified Planning Zones .....	32

**Appendices**

<b>Appendix A</b>	Glossary of Planning Terms .....	35
<b>Appendix B</b>	Local Development Plan Consultation Bodies .....	38
<b>Appendix C</b>	Consultation on the Development Management Process .....	39
<b>Appendix D</b>	Local Development Plan Process .....	40
<b>Appendix E</b>	Planning Application Process .....	41
<b>Appendix F</b>	Material and Non Material Considerations .....	42
<b>Appendix G</b>	List of Local Newspapers for Advertisements .....	43

## 1.0 Introduction

### **Our Statement of Community Involvement: Background and Purpose**

- 1.1 Following the transfer of planning powers to local councils on the 1<sup>st</sup> April 2015 Newry, Mourne and Down District Council has become the main decision maker on the majority of planning applications within its District and is the body responsible for the production of its local development plan.
- 1.2 The purpose of this statement is to set out policy for involving the community in the production of the Newry, Mourne and Down Local Development Plan and the consideration of planning applications. It describes who, together with how and when the community will be invited to participate in the different stages of both plan formulation and the determination of planning applications.
- 1.3 The term 'community' embraces all the individuals, groups and organisations that make Newry, Mourne and Down what it is and extends to local residents, business, voluntary and community groups and local and national organisations with interests in planning matters.
- 1.4 The requirement to produce a Statement of Community Involvement (SCI) was introduced in the Planning Act (Northern Ireland) 2011. The Planning (Statement of Community Involvement) Regulations (Northern Ireland) 2015 came into operation on the 1<sup>st</sup> April 2015 and set out the process that the Council must follow in preparation of its SCI. The Council do not however see community involvement as just a statutory requirement, it has a positive role to play in helping to identify local issues, inform policy-making, provide feedback on service delivery and create a sense of local ownership.

### **Why is Planning Important?**

- 1.5 The planning system directly affects the environment that we live in, where we live, work, shop and spend our leisure time. Planning decisions determine where new homes, offices, shops and leisure facilities go and what happens to our countryside, open spaces and historic environment. In doing so it influences our quality of life and general well-being.
- 1.6 Planning has to balance competing land uses, shaping places by setting out the vision for how communities will change. For many people planning is something they only get involved with when a development directly affects them, this can sometimes be too late to really influence the process. By getting involved in the early stages of local planning policy formulation as well as the end stage of specific planning applications, you can help to shape the way your local environment looks and works. This document sets out how you can do this.

## A Vision of Participation

- 1.7 The Council is committed to ensuring that all council engagement is meaningful, inclusive and fit for purpose and that all its citizens share a sense of effective participation in the decision making process. The Council therefore aims to ensure that:
- (i) Everyone has an early and informed opportunity to express their views on the development of the area and have it considered before decisions are made; and
  - (ii) All groups in our community, regardless of religious belief, political opinion, racial group, age, sex, marital status, physical ability, sexual orientation, and those with and without dependants are enabled and empowered to participate.
- 1.8 It is intended to adopt a proactive and timely approach to community involvement through a process of providing clear information and encouraging participation during plan preparation. The process must therefore be informative, user friendly, as inclusive as possible, and conducted in an open and transparent way. Every effort is to be made to engage the community, record views and provide feedback throughout the process.

## Principles of Community Involvement

- 1.9 The Council's approach to community involvement is based on a number of key principles.
- **Culture of engagement.** People should know that they are encouraged to take part in the planning process, and that decision makers are interested in their views;
  - **Early involvement.** The community should be involved at an early stage in the preparation of local development documents and major development proposals;
  - **Appropriate Consultation Methods.** Methods used to encourage involvement should be appropriate to people's experience and needs. Arrangements for consultation need to be appropriate for the type of document or application being considered and realistic in terms of available resources.
  - **Clarity.** The planning process and timetables for producing or reviewing local development documents should be clear so that people are able to participate in a timely and effective manner.



### **What are the benefits of community involvement in Planning?**

- 1.10 There are many benefits to involving local communities in the consideration of planning applications, and in the development of plans and policies for their local council area, including:
- a greater focus on the priorities identified by local communities;
  - a greater influence on the provision of local services to ensure they are better able to meet local needs;
  - the suggesting new ways and ideas for achieving objectives;
  - a shared ownership of key policy documents;
  - an increased support for local planning policies; and
  - an increased understanding of how planning policies are developed and how they are linked to each other and other documents produced by the Council.
- 1.11 Community involvement is important to the Council to ensure that the services being delivered tackle issues identified by local communities. It also helps to set priorities, in the context of limited resources, and to ensure that the Council's services are customer focused.

### **Alignment to the Community Plan**

- 1.12 The Local Government Act 2014 introduces a statutory link between the Council's community plan and its local development plan (LDP), in that the preparation of the LDP must take account of the community plan.
- 1.13 Community Planning is "a process led by a council in conjunction with partners and communities to develop and implement a shared vision for their area, a long term vision which relates to all aspects of community life and which also involves working together to plan and deliver better services which make a real difference to people's lives."<sup>1</sup>
- 1.14 The Council's Community Plan will identify long term objectives for improving:
- (i) the social well-being of the district;
  - (ii) the economic well-being of the district; and
  - (iii) the environmental well-being of the district.

### **Review of the Council's SCI**

- 1.15 The body of the SCI will also be reviewed after 5 years to ensure fitness of purpose. It may also be necessary to review the SCI at an earlier date to take account of major legislative changes.

---

<sup>1</sup> Extract from Northern Ireland Community Planning Foundation Programme Version 1 October 2013.

## 2.0 The Local Development Plan

### Purpose, Structure and Process

- 2.1 The purpose of the Newry, Mourne and Down Local Development Plan (LDP), is to inform the general public, statutory authorities, developers and other interested bodies of the policy framework and land use proposals that will guide development decisions within Newry, Mourne and Down District up to 2030.
- 2.2 The LDP will be prepared within the context of the Council's Corporate Plan and Community Plan. It will also take account of regional policy context set by the Northern Ireland Executive and Central Government Departments. This includes, amongst others, The Programme for Government, The Everyone's Involved - Sustainable Development Strategy, The Regional Development Strategy (RDS) and The Strategic Planning Policy Statement (SPPS).
- 2.3 At the outset of the plan process a timetable will be prepared and published. The timetable will set out the Council's programme for production of the LDP, and will include key milestones and timelines for plan preparation, covering all elements of the process through to adoption.
- 2.4 The LDP will comprise two separate documents, the Plan Strategy and Local Policies Plan. Prior to development of these documents key planning issues will be identified and a range of options for addressing these issues will be brought forward through a Preferred Options Paper.
- 2.5 The Plan Strategy will be developed first and will define the strategic objectives for the future development of the District. It will include a range of strategic policies to facilitate and manage development and a spatial strategy that will indicate where different types of development will be promoted. Once the Plan Strategy is adopted the Local Policies Plan will be prepared. This will include site specific proposals, policy designations and land use zonings required to deliver the Plan Strategy, objectives, and strategic policies.
- 2.6 The LDP will be subject to a Sustainability Appraisal which will run in parallel with preparation of the Preferred Options Paper, Plan Strategy and Local Policies Plan. The Sustainability Appraisal process aims to promote sustainable development by assessing the extent to which policies and proposals in the LDP, when judged against reasonable alternatives, will help to achieve social, economic and environmental objectives.
- 2.7 The LDP will, on adoption, replace the current development plans for the District (the Ards and Down Area Plan 2015 and the Banbridge, Newry and Mourne Area Plan 2015) and operational planning policies that were produced by the Department of the Environment.

### **Who can get involved?**

2.8 Anyone who wishes to get involved in the preparation of this local development plan will be encouraged to do so at the opportunities provided. In particular the views of the following groups of people will be sought:

- people living within the Newry, Mourne and Down District;
- elected representatives;
- voluntary groups;
- community forums / groups / umbrella organisations;
- environmental groups;
- residents groups;
- business interests; and
- developers / landowners.

This list is not intended to be exhaustive nor is it intended to restrict any individual group, or organisation from participating in the plan making process.

2.9 Elected members, forums, community and residents groups provide a voice for the local community. Other voluntary and interest groups also bring a special knowledge and can ensure that important concerns are addressed.

### **Empowering disadvantaged and under-represented groups**

2.10 Section 75 of the Northern Ireland Act 1998 requires a public authority, in carrying out its functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity between:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

2.11 In addition, without prejudice to the above obligations, public authorities are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or race. The above "Section 75 groups" are important participants within the planning process and include people who traditionally have been under represented or disadvantaged. These groups will be targeted through the consultation process on the local development plan in order to obtain their views and contribute to the consideration of equality issues under Section 75. Their views on any equality screening documents or draft Equality Impact Assessments will also be sought within the specified period for comment along with the draft Plan Strategy and draft Local Policies Plan.



- 2.12 To ensure that Local Development Plan and consultation documents are accessible to everyone they will be made available in alternative formats upon request. Alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

### **How and when will the Community be involved?**

- 2.13 The formulation of a local development plan involves a number of key stages each presenting opportunities for community involvement. These stages are: Data Collection; publication and adoption of the Plan Strategy; publication and adoption of the Local Policies Plan and Monitoring and Review. The actions will fulfil the statutory requirements on public consultation, as set out in the Planning Act (Northern Ireland) 2011.
- 2.14 The LDP Timetable will outline an indicative timeframe for each of the stages. Council will give notice, by local advertisement, of the availability of the timetable, which can be viewed on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate).

### **Next Steps**

- 2.15 Council must carry out a review of its LDP every five years and no later than five years from the date that the local policies plan was first adopted or approved. A report on the findings of the review must be sent to the Department for Infrastructure (DfI).

### **Stages in the LDP Process**

#### **Stage 1: Data Collection**

- 2.16 The purpose of the data collection stage is to establish whether a new plan is needed the key issues to be addressed and the options for addressing them. This will be undertaken using a topic based approach accompanied with a Countryside Assessment. By the end of this stage a timetable for plan preparation and the SCI will be agreed. A Preferred Options Paper (POP) will be prepared together with Scoping Reports for the Sustainability Appraisal including Strategic Environmental Appraisal and Equality Impact Assessment.

**What we will do:**

- Following approval of the timetable by the Council and the Department for Infrastructure (DfI) we will issue a Public Notice in the local newspapers (see Appendix G) for two consecutive weeks. This notice will confirm details of the following:
  - (i) the LDP timetable is available for public inspection; and
  - (ii) the locations and times it can be inspected.
- We will set up a Steering Group comprising elected members and Senior Council Officers (to be determined by the Council). This is the high-level co-ordinating body that will ensure overview and strategic input on behalf of the whole community, as well as from the planning professionals.
- We will set up a Project Management Team comprising Senior Council Officers and representatives from the key statutory/government departments will also be invited. The purpose of the team is to facilitate key consultee cooperation in the plan making process. The Project Management team will be consulted on and act as the screening and scoping group for the Sustainability Appraisal, including Strategic Environmental Assessment and Equality Impact Assessment.
- We will issue invitations to key consultees (see Appendix B) requesting them to participate in the plan making process by providing information on the key strategic issues that the Local Development Plan should address.
- We will invite under represented (Section 75) groups to identify whether there are any types of planning policies which are likely to have a significant impact on the groups they represent.
- We will send the Scoping Report of the Sustainability Appraisal incorporating Strategic Environmental Assessment to the Northern Ireland Environment Agency (NIEA) as the statutory consultation body.

**Stage 2: Formal Notice of LDP Preparation**

- 2.17 This stage represents the formal commencement of work on the Local Development Plan. It commences with the publication of the Preferred Options Paper (POP) which will set out the key plan issues, identify a range of options available to address them and define our preferred options. The POP will be subject to a period of public consultation to promote debate on issues of strategic significance which are likely to influence the shape of future development within the Newry, Mourne and Down District. The intention is to stimulate a wide-ranging, yet focused, debate and encourage feedback from a wide variety of interests. Any representations or views

received as a consequence of its publication will be considered whilst formulating the draft Plan Strategy.

- 2.18 The POP is subject to a Sustainability Appraisal (SA). An SA Interim Report, consisting of SA Scoping Report and assessment of alternatives, will be published with the POP.

#### **What we will do:**

- We will issue a Public Notice in the local newspapers (see appendix G) for two consecutive weeks and on the Council's website. This notice will confirm:
  - (i) the Council's intention to prepare a Local Development Plan;
  - (ii) publication of the Sustainability Appraisal Interim Report (consisting of a Scoping Report and assessment of alternatives), and screening reports for Habitats Regulations Assessments (HRA) and Equality Impact Assessments;
  - (iii) publication of the LDP timetable;
  - (iv) publication of the Preferred Options Paper inviting comment within the 8 week consultation period<sup>2</sup>; and
  - (v) details of launch events, community workshops or information sessions during the consultation period.
- We will make the topic papers available to view on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).
- We will issue a Press Release about the intention to prepare a new LDP and drawing attention to the Preferred Options Paper and the public consultation.
- We will hold a launch event to announce the publication of the Preferred Options Paper.
- We will hold public exhibitions where planning officers will be available to answer any questions.
- We will write to key consultees and Elected Members providing them with a copy of the Preferred Options Paper and inviting them to attend the launch, provide comments within the next 8 weeks; inform them of the public meetings, exhibitions etc.

<sup>2</sup> Regulation 11(3) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 states that, in relation to a Preferred Options Paper; this "must be a period of not less than 8 weeks or more than 12 weeks".



- We will write to local community groups and under-represented (Section 75) groups inviting them to; comment within the next 8 weeks; attend the public meetings, exhibitions etc; and offering the opportunity of a meeting with a planning officer to record their views.
- We will present a Public Consultation Report to Elected Members following the 8 week consultation on the POP. This will contain a summary of each representation and plan team comment, recording where members take a different view and the rationale for that view. This will be taken into account whilst formulating the draft Local Development Plan.
- We will provide The Project Management Team with the opportunity to comment on emerging policy for inclusion in the draft Plan Strategy, an integral part of testing emerging policy through the Sustainability Appraisal process and Equality Impact Assessment.

### **Stage 3: Publication of draft Plan Strategy**

- 2.19 The Plan Strategy will define the strategic objectives for the future development of the District. It will include a range of strategic policies to facilitate and manage development together with a spatial strategy that indicates in broad strategic terms the locations where different types of development will be promoted.
- 2.20 The draft Plan Strategy will provide an indication of our intentions regarding future development of the District. It will be issued for public consultation as a key part of the community involvement and public participation process.

#### **What we will do:**

- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette<sup>3</sup> and on the Council's website. This notice will state:
  - (i) publication of draft Plan Strategy and accompanying Sustainability Appraisal (including the Environmental Report and Equality Report), and how to view or obtain copies;
  - (ii) the dates and locations of public engagement events; and
  - (iii) the 8 week period<sup>4</sup> and closing date for receipt of representations to the draft Plan Strategy and accompanying Environmental Report.

<sup>3</sup> The Belfast Gazette is the official Newspaper of Record for Northern Ireland. It consists of legal and official announcements from HM Government, the NI Executive, the Armed Forces, local authorities, churches, companies and private citizens.

<sup>4</sup> Regulation 16(2)(a) of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 states that, in relation to a Development Plan Document, "representations must be made with a period of 8 weeks".

- We will make the draft Plan Strategy, the Sustainability Appraisal (including the Environmental Report), the Equality Report, and the Public Consultation Report available for inspection on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).
- We will issue a Press Release and hold a launch event to announce the publication of the draft Plan Strategy.
- We will hold public exhibitions where planning officers will be available to answer any questions.
- We will write to key consultees, and Elected Members informing them of the publication of the draft Plan Strategy and providing them a copy; the dates of the public exhibitions; and confirmation of the 8 week period for public consultation and the closing date for receipt of representations.
- We will report representations to the Elected Members before being forwarded to the DfI prior to the Independent Examination.

#### **Stage 4: Public Inspection of Representations received to the draft Plan Strategy**

- 2.21 All representations are to be made available for public inspection as part of the public consultation process. Interested parties may also comment on the site specific policy representations that have been received, these are known as counter-representations.
- 2.22 All representations and counter-representations will be fully considered by the Council before it forwards the draft Plan Strategy to the DfI for Independent Examination prior to the Independent Examination.

#### **What we will do:**

- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette, and on the Council's website. This notice will state:
  - (i) the availability of representations for inspection; and
  - (ii) the 8 week period for public consultation, and the closing date for receipt of counter-representations.

- We will make representations available for inspection on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).
- We will write to key consultees and Elected Members informing them that representations are available for inspection and the places and times they can be inspected.
- We will make the counter-representations available for inspection on our website, and in our planning offices at Monaghan Row, Newry and Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).
- We will report counter-representations to the Elected Members before forwarding them to the Department for Infrastructure prior to the Independent Examination.

### **Stage 5: Submission of the Plan Strategy (and associated documents) for Independent Examination**

- 2.23 Council will only submit the draft Plan Strategy, associated documents and supporting evidence to the DfI if it considers that they are ready for examination. The DfI will then cause an Independent Examination to be held, unless it issues a direction to Council to withdraw the draft Plan Strategy, or intervenes to direct Council to modify it.
- 2.24 In either scenario, the DfI will be expected to give reasons for its decision.

#### **What we will do:**

- Submit the following documents to DfI:
  - (i) Draft Plan Strategy;
  - (ii) Statement of Community Involvement;
  - (iii) Evidence of compliance with SCI;
  - (iv) LDP timetable;
  - (v) Sustainability Appraisal;
  - (vi) Statement setting out the main issues raised in representations made and how these have been taken into account in the preparation of the draft Plan Strategy; and
  - (vii) Such other documents that are required or as Council considers relevant to the preparation of the draft Plan Strategy.



- As soon as reasonably practicable after the submission of the draft Plan Strategy and associated documents (see above) to DfI we will:
  - (i) issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette and on the Council's website. Advising of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination;
  - (ii) notify the consultation bodies of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination;
  - (iii) notify any person who has made (and not withdrawn) representations or counter representations; and
  - (iv) we will make the draft Plan Strategy and all associated documentation available on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).

### **Stage 6: Independent Examination (IE) of the draft Plan Strategy**

- 2.25 The purpose of the Independent Examination is to determine the soundness of the draft Plan Strategy, taking into account all representations received.
- 2.26 The examination will be carried out by either the Planning Appeals Commission (PAC) or other persons appointed by DfI. They must consider all representations before they make recommendations.
- 2.27 Council Planning Officers, consultees and any consultants (acting on behalf of Council) will be available at the examination to answer questions and provide comment on representations.

#### **What we will do:**

- We will request key consultees to provide comment on the representations for consideration at the Independent Examination.
- At least 4 weeks before the opening of the Independent Examination:
  - (i) we will issue a Public Notice in the local newspapers (see Appendix G), in the Belfast Gazette and on the Council's website advising the dates, times and venues for the Independent Examination;
  - (ii) we will notify consultation bodies of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination; and

- (iii) we will notify all persons who submitted (and have not withdrawn) representations and counter representations of the arrangements for the Independent Examination.
- Continue to make the draft Plan Strategy and all associated documentation available on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).

### **Stage 7: Adoption of the Plan Strategy**

- 2.28 Following the Independent Examination, the PAC, or other person appointed by DfI, will send their recommendations and reasoning to DfI.
- 2.29 DfI will issue a Direction to the Council, requiring us to adopt the draft Plan Strategy as originally prepared or with modifications. The DfI may also direct the Council to withdraw the draft Plan Strategy. In either scenario, DfI will be expected to give reasons for its decision.
- 2.30 Council must comply with the Direction within such timeframes as may be prescribed by DfI. The Plan Strategy must be adopted by resolution of the Council.

### **What we will do:**

- Adopt the Plan Strategy as soon as reasonably practicable after receipt of the Direction from DfI.
- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette and on the Council's website. This notice will confirm:
  - (i) adoption of our Plan Strategy; and
  - (ii) where to get copies of the Plan Strategy, the DfI Direction and the accompanying Independent Examiners Report.
- On the date of adoption we will make the Plan Strategy and the DfI Direction and accompanying Independent Examiners Report available on the Council's website. Hard copies will be available on request for a specified price from the Council Planning Offices.
- We will write to key consultees advising of the adopted of the Plan Strategy, and where to get hold of copies together with the DfI Direction and the Independent Examiner's Report.

- We will send DfI a copy of the Plan Strategy and other necessary documents.
- We will notify any person who has asked to be notified of the adoption of the Plan Strategy.

### **Stage 8: Publication of the draft Local Policies Plan**

- 2.31 The Local Policies Plan is the second document comprising the Local Development Plan. This must be consistent with the Plan Strategy and will contain the Council's detailed land use policies and proposals regarding the future development of the District. This draft document is a key part of the public participation process.
- 2.32 The draft Local Policies Plan will provide detailed zonings and designations for the District. The Plan Strategy must be adopted before the draft Local Policies Plan is published for consultation, subjected to Independent Examination and adopted.

#### **What we will do:**

- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette and on the Council's website. This notice will confirm:
  - (i) publication of Draft Local Policies;
  - (ii) the dates and locations of Public Exhibitions; and
  - (iii) the 8 week period and closing date for receipt of representations.
- We will make the draft Local Policies Plan and any supporting documentation available on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies can also be provided upon request (at a specified price).
- We will issue a Press Release and hold a launch event to announce the publication of the draft Local Policies Plan.
- We will hold public exhibitions where planning officers will be available to answer any questions.
- We will write to key consultees, and Elected Members informing them of:
  - (i) the publication of the draft Local Policies Plan and providing them a copy;
  - (ii) the dates of the public exhibitions;
  - (iii) the 8 week consultation period; and



- (iv) the closing date for receipt of representations.
- We will report representations to the Elected Members before being forwarded to the Department for Infrastructure prior to the Independent Examination.

### **Stage 9: Public Inspection of Representations received to the draft Local Policies Plan**

- 2.33 All representations to the draft Local Policies Plan will be made available for public inspection as part of the public consultation process. Interested parties may also comment on the representations that have been received (counter-representations).
- 2.34 All representations and counter-representations will be fully considered by the Council before it submits the draft Local Policies Plan to the Department for Infrastructure.

#### **What we will do:**

- We will make representations available for inspection on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies of representations can also be provided upon request (at a specified price).
- We will write to key consultees and elected members informing them that representations are available for inspection and the places and times at which they can be inspected.
- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, the Belfast Gazette, and on the Council's website. This notice should state the availability of representations for inspection and the 8 week consultation period including closing date for counter representations.
- We will make counter representations available for inspection on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick during normal working hours (and at any other places within the District that the Council considers appropriate). Hard copies of counter representations can also be provided upon request (at a specified price).
- We will report counter representations to the Elected Members before forwarding these to the DfI prior to the Independent Examination.

### **Stage 10: Submission of the draft Local Policies Plan, and associated documents, for Independent Examination**

- 2.35 Council will only submit the draft Plan Strategy, associated documents and supporting evidence to the DfI if it considers that they are ready for examination. DfI will then cause an Independent Examination to be held, unless it issues a direction to Council to withdraw the draft Local Policies Plan, or intervenes to direct Council to modify it.
- 2.36 In either scenario, the DfI will be expected to give reasons for its decision.

#### **What we will do:**

- Submit the following documents to DfI:
  - (i) draft Local Policies Plan;
  - (ii) Statement of Community Involvement (SCI);
  - (iii) evidence of compliance with SCI;
  - (iv) LDP timetable;
  - (v) Sustainability Appraisal;
  - (vi) statement setting out the main issues raised in representations made and how these have been taken into account in the preparation of the draft Local Policies Plan; and
  - (vii) such other documents that are required or as Council considers relevant to the preparation of the draft Local Policies Plan.
  
- As soon as reasonably practicable after the submission of the draft Local Policies Plan and associated documents (see above) to DfI we will:
  - (i) issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette and on the Council's website, advising of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination.
  - (ii) notify the consultation bodies of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination.
  - (iii) notify any person who has made (and not withdrawn) representations or counter representations.
  
- Continue to make the draft Local Policies Plan and all associated documentation available on the Council's website and at the Council's Planning Offices at Monaghan Row, Newry and the Downshire Civic Centre, Downpatrick (and at any other places within the District that the Council considers appropriate) and provide hard copies upon request (at a specified price).

### **Stage 11: Independent Examination of the draft Local Policies Plan**

- 2.37 The purpose of the Independent Examination is to determine the soundness of the Local Policies taking into account all representations received.
- 2.38 The examination will be carried out by either the Planning Appeals Commission (PAC) or other persons appointed by DfI. They must consider all representations and counter representations before they make recommendations.
- 2.39 Council Planning Officers will be available to answer any question of the Independent Examiners and provide comment on the representations and counter representations.

#### **What we will do:**

- We will request key consultees to provide comment on the representations for consideration at the Independent Examination.
- At least 4 weeks before the opening of the Independent Examination:
  - (i) We will issue a Public Notice in the local newspapers (see Appendix G), in the Belfast Gazette and on the Council's website advising the dates, times and venues for the Independent Examination.
  - (ii) We will notify consultation bodies of the time and place at which the examination is to be held and whether the PAC or another (identified) person appointed will carry out the examination.
  - (iii) We will notify all persons who submitted (and have not withdrawn) representations and counter representations of the arrangements for the Independent Examination.
- Continue to make the draft Local Policies Plan and all associated documentation available on the Council's website and at the Council's Planning Offices during normal working hours (and at any other places within the District that the Council considers appropriate) and provide hard copies upon request (at a specified price).

### **Stage 12: Adoption of the Local Policies Plan**

- 2.40 Following the Independent Examination, the DfI will issue a Direction to the Council, requiring it to adopt the draft Local Policies as originally prepared or with modifications. The Council may also be directed to withdraw the draft Local Policies. In either scenario, the DfI will be expected to give reasons for their decisions.



**What we will do:**

- We will issue a public notice in the local newspapers (see Appendix G) for two consecutive weeks, in the Belfast Gazette and on the Council's website. This notice will confirm:
  - (i) adoption of the Local Policies; and
  - (ii) where to get copies of the Local Policies, the DfI Direction and the accompanying Independent Examiners Report.
- Make the Local Policies Plan and the DfI Direction and accompanying Independent Examiners Report available on the Council website with hard copy available on request for a specified price;
- Write to key consultees and those submitting representation advising of the adopted of the Local Policies, and where to get hold of copies together with the DfI Direction and the Independent Examiners Report; and
- Send DfI a copy of the Local Policies Plan and other necessary documents.

**Next Steps**

- 2.41 Following the adoption of the Plan Strategy and Local Policies Plan, the Council will identify its work priorities for the next five years in a new Timetable. It may also issue a new Statement of Community Involvement to accompany these if considered appropriate. In addition the Council will engage in monitoring and review which are essential in establishing how the objectives in the Local Development Plan are being achieved and whether any changes are required.

### 3.0 Development Management

#### Purpose

- 3.1 The Council as the local planning authority for the area deals with the majority of planning and Listed Building applications in the district. It also deals with applications for works in conservation areas, works to protected trees and advertising consent.
- 3.2 Development management is the process through which such applications are considered. An important part of the process is to provide information and advice to applicants and to seek and take into account the views of the general public and statutory consultees on all planning applications. The statutory requirements for consultation on planning applications are set out in legislation. These requirements vary according to the type of proposal but include notification to specified bodies and general publicity.
- 3.3 All planning applications are now categorised on receipt as local, major or regionally significant, with the Council responsible for determining all local and major applications, unless called-in by the DfI.
- 3.4 Regionally significant developments are those which are considered to have a critical contribution to make in regard to the economic and social success of Northern Ireland as a whole, or to a substantial part of the region. Such proposals also include developments which have significant effects beyond Northern Ireland or involve substantial departure from a Local Development Plan. Regionally significant applications are processed by the DfI.
- 3.5 Major developments have important economic, social and environmental implications for the Council. Due to the potential of these proposals to deliver important benefits to the community, major applications are prioritised to avoid undue delay and risk to investment decisions. Common examples of major development proposals include:
- a housing development involving the construction of 50 units or more, or where the area of the site is or exceeds 2 hectares;
  - a retail development involving 1,000 square metres or more of gross retail floor space outside town centres, or where the area of the site is or exceeds 1 hectare; and
  - industrial development involving 5,000 square metres or more gross floor space or where the area of the site is or exceeds 1 hectare.
- 3.6 Local development proposals are those applications which are not considered to be regionally significant or major. The vast majority of planning applications are likely to constitute local developments and these will include most commercial and housing proposals as well as minor schemes and householder development.

- 3.7 The Council receives a wide variety of planning applications and therefore needs to involve the community to differing degrees, according to the scale and complexity of the application.

This section of the SCI looks at:

- how the public can become involved at the various stages of the application process; and
- how the level of community involvement will depend on the scale of the application.

### **Pre-Application Stage**

#### Pre-Application Discussions (PADs)

- 3.8 Pre-application discussions are encouraged for a range of types of applications, both major and local. The objective of pre-application discussions should be to confirm whether the principle of development is acceptable and to clarify the format, type and level of detail required to enable the council to determine an application. For major applications it will also enable the applicant to discuss with the council details of how the community should be involved in the decision-making process.

#### Pre-Application Community Consultation (PACC)

- 3.9 The 2011 Planning Act has introduced a requirement for applicants to inform and involve the wider community in planning applications. Greater community engagement from the outset is key to not only creating better quality developments but also improving the process of place making. Applicants submitting major applications to the Council or as the case may be the DfI are, as of the 1 July 2015, required to undertake community consultation before submitting their application.

The Council will require the following actions to be undertaken by the applicant before a major application is submitted-

- (i) notify the Council, 12 weeks in advance, that an application for a major planning application is to be submitted. This is referred to as a Proposal of Application Notice (PAN) and will outline the detail of the proposed application and what consultation is to be undertaken;
  - (ii) hold at least one public event where the community will be afforded the opportunity to make comment;
  - (iii) publish details of the proposal in the local press, outlining where further details can be obtained and the date, time and location of a public event; and
  - (iv) submit a pre-application community consultation report on submission of the planning application.
- 3.10 The Council will assess the report and determine if the consultation undertaken meets the legislative requirements. The Council may, providing it does so within 21



days of receipt of the PAN, ask that the applicant notify further individuals or organisations or advise that additional consultation is required.

- 3.11 Pre-application consultation is likely to be more successful if the applicant makes significant efforts to open lines of communication with, and provide feedback to, local communities and work with them to secure development proposals which are acceptable to everyone.
- 3.12 As previously stated the Council would recommend all applicants considering submitting development proposals that fall within the definition of major development to seek a Pre-Application Discussion with planning officers. Where applicants fail to fully meet the pre-application community consultation requirements the Council will decline to determine the application.
- 3.13 Local people are encouraged to participate in the pre-application consultation as this should help applicants better understand local concerns or circumstances and possibly take action to address these concerns before submitting a formal application. Where local concerns and issues are not adequately addressed by the applicant at pre-consultation stage they should be raised again at formal application stage.

### **Application Stage**

- 3.14 When a planning application is submitted for determination the Council will involve the community in the decision making process. If you feel you will be affected by development proposals you will have an opportunity to consider what is proposed and how it will affect you. You will also have the opportunity to make your views known before a final decision is made on the application.

The Council will inform the public of all planning applications through:

- Advertising; and
- Neighbour Notification.

- 3.15 The Council undertakes statutory publicity in accordance with current legislation. Government may change the statutory publicity requirements and our future approach will reflect any changes that are made.

### Advertising

- 3.16 The Council will advertise all new applications on a weekly basis in at least one local newspaper (listed in Appendix G) in accordance with Article 8 of the Planning (General Development Procedure) Order (NI) 2015. The weekly list of all new applications received by the Council can also be viewed on the Planning NI web portal.<sup>5</sup>

<sup>5</sup> See [http://www.planningni.gov.uk/index/my\\_council/council\\_newry\\_mourne\\_down.htm](http://www.planningni.gov.uk/index/my_council/council_newry_mourne_down.htm)

The notice placed in the local newspapers advises that any representations to be made should be received within 14 days of publication (4 weeks in the case of EIA applications) to assist efficient processing of applications. However, it should be noted that any late representations made on an application, provided they are received before a decision is made, will be considered.

#### Neighbour Notification

- 3.17 The Planning (General Development Procedure) Order 2015 states that any identified occupier of land neighbouring the land to which the application relates shall be notified by serving a notice on them. Under the Council's neighbour notification scheme, the Council will issue neighbour notification letters to occupiers of neighbouring premises which fulfil both of the following criteria:
- (i) the property in question is within 90m of the boundary of the application site;
  - and**
  - (ii) meets the definition of neighbouring land, in that it directly adjoins the boundary of the application site, or would adjoin it but for an entry or road less than 20m in width.
- 3.18 The Planning Officer when carrying out a site inspection will also check the accuracy of the neighbour notification details supplied on the application form and may add details as considered appropriate.
- 3.19 The period for responding following receipt of a neighbour notification letter is also 14 days (4 weeks in the case of applications requiring an Environmental Impact Assessment) , though again any late representations received before a decision is made will still be considered.

#### EIA Development

- 3.20 Environmental Impact Assessment (EIA) is a method for ensuring that the likely effects of new development on the environment are fully understood and taken into account before consent is given for the development to proceed.
- 3.21 The Environmental Statement (ES) produced as part of an environmental impact assessment, brings together in a single document or series of documents information about a proposed development and its effects on the environment.
- 3.22 In most cases it will fall to the Council to determine if the application is an EIA application. It should be noted that if an application is an EIA application it cannot be processed until the ES is received. When a developer submits an ES in support of a planning application, the Council will publish a notice of its receipt in a local newspaper and indicate where it may be purchased and the address of the Council Office where it may be inspected. The Council will also allow 4 weeks from the date the notice is first published for representation to be made.

### **Obtaining further information and getting involved in planning applications**

- 3.23 The weekly lists of planning applications received within the council area are also available on the Northern Ireland Planning Portal ([www.planningni.gov.uk](http://www.planningni.gov.uk)). Planning applications including supporting documents and corresponding plans can be viewed online as well at the Council offices during normal office hours. A duty Planning Officer will be available during normal office hours (9am – 5pm) to give advice on current or proposed applications (you are advised to make an appointment if you wish to speak to a particular officer).

#### Public Register

- 3.24 The Council will make the application, plans and any associated environmental statement available on a public register. Each register will contain the following information:
- a copy( which may be photographic) of each application together with copies of plans and drawings submitted in relation thereto;
  - the decision notice, if any, in respect of the application, including details of any conditions subject to which permission or consent was granted;
  - the reference number, the date and effect of any decision of the PAC in respect of the application; and
  - brief details of any revocation or modification relating to any permission or consent, including date of issue.

#### File Inspection

- 3.25 Planning application files are open to the public, the Council will make the application file available for inspection, by appointment. The amount of information on the file, will of course, be dependent on the stages the application has completed. Certain information may be withheld on data protection grounds e.g. a person's medical information.

#### Submitting Comments

- 3.26 Individuals, groups and organisations can comment on a planning application even if they have not been neighbour notified by the Council. All comments will be carefully considered. Care should be taken when making comments to the Council to ensure that no personal data is included.
- 3.27 When a decision is made on a planning application only certain issues are taken into account, these are often referred to as 'material planning considerations'. Material considerations must be genuine planning considerations. The basic question is not whether owners and occupiers of neighbouring properties would experience financial



or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings that ought to be protected in the public interest. A list of material and non-material considerations is contained in Appendix F.

3.28 Generally greater weight is attached to issues which are supported by evidence rather than solely by assertion. If an identified problem can be dealt with by means of a suitable condition the Council is required to consider this as an alternative to refusing an application.

3.29 You can make comments in a variety of ways, these are as follows-

By email: [planning@nmandd.org](mailto:planning@nmandd.org) (Please quote the application number)

By post to:

Newry Planning Office	or	Downpatrick Planning Office
O'Hagan House		Downshire Civic Centre
Monaghan Row		Downshire Estate, Ardglass Rd
Newry BT35 8DJ		Downpatrick BT30 6GQ

Online through the Planning Portal. Comments can be submitted by members of the public through Public Access once they have been registered for an account on the Planning Portal.

<http://epicpublic.planningni.gov.uk/publicaccess/>

3.30 All written comments on an application will be acknowledged within five working days. The acknowledgement letter will set out who is dealing with the application and who to contact if there are any questions.

3.31 Whilst Planning Officers may not be able to respond to each comment made due to the large numbers received. All comments will be summarised and fully considered within the Planning Officer's report.

3.32 The Council will not normally contact the respondent again until after a decision is made unless the application is significantly altered or is withdrawn.

3.33 The Council may, if it considers it appropriate to do so, stage public exhibitions, issue press releases or arrange public meetings to provide information about major developments or proposals which are particularly significant or have wide-spread effects on communities.

3.34 The Council will consult with a range of Statutory Consultees (see Appendix C) to assist in the determination of an application. If a representation raises issues that are relevant to the responsibilities of the consultee (e.g.road safety) the representative

will be copied to the appropriate consultee for consideration and comment. The council will carefully take any comments made into account before a decision is made. All comments are scanned and added to the web site once email addresses and hand written signatures have been removed.

- 3.35 The Council may negotiate changes to applications where these are expedient. Re-consultation (for 14 days), re-advertisement and further neighbour notification will take place on minor amendments if the council considers that they raise new issues that could lead to further comment. If any change is considered to be substantive, the council may decline to treat it as an amendment and a new application may be invited.

### **Community Involvement at the Planning Committee Stage**

- 3.36 The Planning Committee meeting is normally held every fourth week in the Boardroom , O'Hagan House, Monaghan Row, Newry. Additional meetings of the Planning Committee may be scheduled according to business needs. The meeting commences at 10.00am (unless otherwise stated and may be subject to change) and is open to the public.

#### Scheme of Delegation

- 3.37 The majority of planning applications submitted to Council are determined by Council appointed planning officers using delegated powers. The circumstances under which an application can, or cannot, be determined using delegated powers are set out in the Council's Scheme of Delegation. It should be noted that this document will be subject to regular review. The most up to date version of the document can be accessed at : <http://www.newrymournedown.org/planning>. A copy is also available for inspection, during normal working hours, at the Council Planning Office.

#### Protocol for the Operation of the Planning Committee

- 3.38 Applications which do not fall within the Scheme of Delegation must be presented to the Council Planning Committee for decision. Council's Protocol for the Operation of the Planning Committee sets out the detailed procedures for this Committee. It should be noted that this protocol is also subject to change. The most up-to-date version of the document can be viewed on the Council's website. A copy is also available for inspection, during normal office hours, at the Council's Planning Offices.

### **Pre-determination hearings and speaking at the Planning Committee**

- 3.39 There may be occasions when major applications will raise particularly complex planning issues or attract a significant level of objection. In such cases the Planning Committee may decide to hold a pre-determination hearing prior to making its decision at the scheduled monthly Planning Committee meeting.



- 3.40 A pre-determination hearing will provide the opportunity for the applicant and their agent, as well as those who may have made representations, to present their case to the committee and for Members to ask questions and clarify matters. Key consultees may also be invited to report their expert views. When the Planning Committee agrees to such a hearing, the applicant will be advised and the detailed arrangements will be advertised in the local press. Any hearing will take place after the expiry of the period for making representations on the application but before the Committee hears the application.
- 3.41 For any major application that has been notified to the Department for Infrastructure but is subsequently returned to the Council for determination, the Council is required to afford the applicant the opportunity of appearing before and being heard by the Planning Committee at a Pre-determination hearing.
- 3.42 If a member of the public wishes to speak at the Planning Committee they must contact the Council's Democratic Services by telephone or email ([democratic.services@nmandd.org](mailto:democratic.services@nmandd.org)) at least 5 working days before the date of the meeting at which the application will be considered. Only those who have made written submissions in respect of a planning application and registered a request to speak in respect of the application shall be permitted to make oral representations before the Committee as outlined in the Planning Committee Operating Protocol (available to view on the Council's website or at local planning office).

### **Post Application Stage**

#### **Community Involvement after a Planning Application has been determined**

- 3.43 A notification of decision letter is sent to the applicant/agent and all people who have responded to the consultation on the planning application, informing them of the decision and the reason for that decision. The decision is recorded in the statutory Planning Register. If it is a case that has been considered by the Planning Committee, it can be found either by contacting the Planning Development Management team following the Committee meeting, or by viewing the minutes of the committee meeting published on Council's website.

#### **Community Involvement in Planning Appeals**

- 3.44 Planning appeals may be made against the refusal of planning permission, against conditions placed on a planning approval and against an enforcement notice. Only applicants and those upon whom notices have been served have the right of appeal. There are no third party rights of appeal. Where an applicant is unhappy with the Council's decision on an application or a condition attached to a permission, he/she may appeal to the Planning Appeals Commission (PAC). An applicant may also appeal to the PAC where the Council has not determined an application within the relevant



period prescribed by the Planning (General Development Procedure) Order (NI) 2015, where such an appeal is lodged, the application is deemed to have been refused. Appeals must be lodged with the PAC within four months from the date of notification of the Council's decision, or expiry of the prescribed period as the case may be.

- 3.45 All those people who responded on the original planning application that is the subject of appeal will be advised that an appeal has been received, and provided with an opportunity to make their views known. Copies of letters already submitted will be forwarded to the PAC. For hearings and public inquiries, the interested parties have the opportunity to make their views known verbally to the PAC. Guidance on Planning Appeals and the rights of applicants and objectors can be found on the PAC website [www.pacni.gov.uk](http://www.pacni.gov.uk)

## 4.0 Planning Enforcement

4.1 The Council encourages the community to report cases where they believe there has been a breach of planning control. A breach of planning control occurs when development or other certain activities take place without the necessary planning permission or consent from the Council or the Department. This may also include failure to carry out development in accordance with the approved plans or conditions.

4.2 Suspected breaches of planning control can be reported in the following ways:

By email: [planning@nmandd.org](mailto:planning@nmandd.org)

By post to:

Newry Planning Office	or	Downpatrick Planning Office
O'Hagan House		Downshire Civic Centre
Monaghan Row		Downshire Estate, Ardglass Rd
Newry BT35 8DJ		Downpatrick BT30 6GQ

By Phone: 0300 200 7830

4.3 You may also wish to raise the matter with one of the Elected Members who can bring the matter to the attention of the Planning Officers on your behalf.

4.4 All planning enforcement related complaints are treated confidentially. If the complaint results in a planning application being submitted, then this will be publicised in the normal manner and adjoining neighbours and complainants notified.

4.5 In cases where planning enforcement action is taken, complainants are informed of the action. In cases where enforcement action is not taken, a full explanation providing the council's reasons will be sent to the complainants. Many initial complaints relate to non-enforcement issues in the district, such as householder permitted development type extensions or alterations to a dwelling house.

4.6 The Council's priorities for enforcement action will be set out within our forthcoming Enforcement Strategy. Once published, this strategy will be subject to regular review.

## **5.0 Community Involvement in Other Planning Functions**

### **Community Involvement in Supplementary Planning Guidance**

- 5.1 The Council may also prepare non-statutory planning guidance to support its development plan. Supplementary planning guidance includes for example design guides and advice notes. These will be published for public consultation and comment prior to the publication of the final draft. Comments received will be published on the Council web site. It is not necessary for Supplementary planning guidance to go through the public examination process.

### **Community Involvement in Conservation Area Designation**

- 5.2 A Conservation Area is an area of special architectural or historic interest, the character of which it is desirable to preserve and enhance. The Council considers that consultation with, and the involvement of local people is important when undertaking work associated with Conservation Areas. This will help encourage greater ownership of the concept and greater co-operation and commitment to achieving the aims of the designation.
- 5.3 The Council will involve the community in the designation or variation or cancellation of a Conservation Area. This will entail formal consultation with the Historic Buildings Council and Department for Infrastructure. Any alterations to existing Conservation Areas or designation of new Conservation Areas will be advertised by way of a public notice in the local press. Where appropriate public meetings will be held to discuss and present proposals.

### **Community Involvement in the Designation of a Simplified Planning Zone**

- 5.4 If the Council proposes to commence work on a simplified planning zone (see Appendix A Glossary of Planning Terms) it will undertake consultations with the neighbouring district council, the land owner and occupier, the Department for Communities and will notify the Department for Infrastructure.
- 5.5 Once details of a scheme have been prepared the Council will make copies available for inspection at the Council's office, give notice by way of an advertisement in the local press and on the Council's website, and will serve a notice on those it has consulted with.
- 5.6 Following advertising of the proposed planning zone(s) details there will be an 8 week period when representations can be made to the Council. If the Council subsequently decides not to proceed with the proposed planning zone it will publish a further advertisement to that effect and will notify all those have made representations.



- 5.7 The Council may cause an independent examination to be held to consider the representations received. Where it is proposed to hold an independent examination details including the time and place of the examination will be published in the local press. Where it is decided not to hold an independent examination the Council will notify all those who have made representations.
- 5.8 Following the independent examination the Council will produce a report and statement detailing its decision and outlining reasons for its decision. Notice of publication will be advertised in the local press and the report and statement will be available for public inspection in the Council offices.

# Appendices

## Appendix A – Glossary of Planning Terms

**Development Management:** The process for a Council to decide on planning applications.

**Development Plan:** Local Development Plans apply regional policies at the appropriate level and inform the general public, statutory authorities, developers and other interested bodies of the policy framework and land use proposals that will guide development decisions within a specified area.

**Environmental Impact Assessment (EIA):** A procedure to be followed for certain types of planning application to ensure that decisions are made in the full knowledge of any likely significant effects on the environment.

**Equality Impact Assessment (EQIA):** An assessment of the likely impact of policies and proposals on the promotion of equality of opportunity. Carried out on all local development plans to fulfil the obligations imposed on the Council by Section 75 of the Northern Ireland Act 1998.

**Independent Examination:** The independent examination conducted by the Planning Appeals Commission to test the soundness of the Local Development Plan.

**Local Policies Plan:** This provides detailed plans and policies for the development of specific geographical area.

**Major Development:** Large scale developed proposals that meet the thresholds contained within The Planning (Development Management) Regulations (Northern Ireland) 2015.

**Material Consideration:** A material consideration is any planning matter which is relevant to a particular case.

**Planning Appeals Commission:** The body which provides a Commissioner to carry out an independent assessment of the soundness of a Development Plan Document or Statement of Community Involvement. The Commission also processes planning, listed building consent, advertisement and enforcement appeals.

**Planning Committee:** the planning committee is responsible for making decisions on the bigger and more sensitive planning applications received by the Council. The planning committee is made up of a number councillors who are responsible for deciding planning applications, listed building and conservation area consents. Which items are considered by the committee is decided through the Council's Scheme of Delegation.

**Plan-led System:** The principle that decisions upon planning applications should be made in accordance with the adopted development plan, unless there are other material considerations that may indicate otherwise.

**Plan Strategy:** This is the first part of the development plan and provides a framework or overview to guide the direction of the local plan.



**Preferred Options Paper (POP):** Ideas, possibilities and alternative proposals produced at any early stage in the production of the Local Plan and issued for public consultation and have not been endorsed by the Council.

**Scheme of Delegation:** a scheme where decision making on local applications is delegated to an appointed officer rather than through the Council's Planning Committee thereby enabling speedier decisions and improved efficiency. Section 31(1) of the Planning Act (Northern Ireland) 2011 requires the Council to produce such a scheme.

**SEA Scoping Report:** A report which sets out how the Council will ensure that the likely significant effects of the development plan will be assessed including the environmental effects and alternatives that need to be considered, the assessment methods to be used as well as the scope and level of detail of information that will be included in the final environmental report.

**Simplified Planning Zone:** An area in which the Council wishes to stimulate development and encourage development. It operates by granting a specified planning permission in the zone without the need for an application for planning permission and the payment of a planning fee.

**Soundness:** A Development Plan document is likely to be sound if it meets certain tests at the Examination stage. These tests require that a document is prepared according to the correct procedures, that it conforms to other policies, and its proposals are justified, consistent and effective.

Justified means that the document must be

- Founded on a robust and credible evidence base; and
- The most appropriate strategy when considered against the reasonable alternatives.

Effective means that the document must be

- Deliverable;
- Flexible; and
- Able to be monitored.

**Stakeholders:** Individuals or organisations who have a strong interest in the issue or may be affected directly by any decisions or plans. The term is used mostly to refer to bodies that will affect the delivery of a planning document's policies and proposals.

**Strategic Environmental Assessment (SEA):** An assessment of the probable environmental impacts of the policies and proposals contained in the LDP. The assessment is carried out to ensure compliance with the European Directive 2001/42/EC on the "assessment of the effects of certain plans and programmes on the environment" and the Environmental Assessment of Plans and Programmes Regulations(Northern Ireland) 2004.

**Statutory Requirements:** Actions required to be undertaken by the Council as a result of legislation.

**Sustainability Appraisal (SA):** a sustainability appraisal considers the likely social, economic and environmental effects of policies in the development plan documents.

## Appendix B Local Development Plan Consultation Bodies<sup>6</sup>

### Statutory Consultation Bodies<sup>7</sup>

1. Northern Ireland Government Departments:
  - The Executive Office;
  - Department of Agriculture, Environment and Rural Affairs (DAERA);
  - Department for Infrastructure (DfI);
  - Department for the Economy (DfE);
  - Department of Education (DE);
  - Department of Finance (DoF);
  - Department of Health (DoH);
  - Department of Justice (DoJ); and
  - Department for Communities (DfC).
2. Adjoining Councils/Planning Authorities with common boundaries:
  - Armagh City, Banbridge and Craigavon Borough Council;
  - Lisburn City and Castlereagh Council;
  - Ards and North Down Borough Council;
  - Louth County Council; and
  - Monaghan County Council.
3. Water and Sewerage undertakers:
  - NI Water
4. Northern Ireland Housing Executive (NIHE).
5. Civil Aviation Authority (CAA).
6. Any person to whom the electronic communication code applies by virtue of a direction given under Section 106(3) of the Communication Act 2003(c).
7. Any person to whom a license has been granted under 10(1) of the Electricity (Northern Ireland) Order 1992(a).
8. Any person to whom a license has been granted under Article 8 of the Gas (Northern Ireland) Order 1996(b).

<sup>6</sup> There may be additional consultations required at specific times throughout the LDP process.

<sup>7</sup> Statutory consultees are those government bodies or other organisations with whom the Council must liaise as part of the development plan process.



## **Appendix C – Consultation on the Development Management Process**

Planning Officers frequently need to obtain specialist advice to enable them to consider the potential impacts of a development proposal before determining an application. This is referred to as the consultation process. Consultation with statutory and non-statutory bodies should be carried out only when considered necessary to inform a planning decision.

Statutory consultees (listed below) are those government bodies or other organisations with whom the Council must liaise. The need for consultations will vary between applications depending on the on the nature and scale of the proposal as well as the provision of standing advice from the consultee.

1. Department for Infrastructure (DFI);
2. Health and Safety Executive NI (HSENI);
3. The Department for Infrastructure or other water undertaker as defined under Article 13 of The Water and Sewerage Services (NI) Order 2006;
4. Licensed Aerodromes;
5. The Department of Agriculture, Environment and Rural Affairs (DAERA);
6. The Department for the Economy (DfE); and
7. The Northern Ireland Housing Executive (NIHE).

Where the Council undertakes consultations on a planning application the consultee will be required to respond within 21 days, or any other date as agreed in writing, after which time the Council may determine the application whether or not a response has been received. The exception is those developments which are subject to an Environmental Impact Assessment (EIA) where the Council cannot make a determination until 28 days have passed.

### **Non-Statutory Consultees**

Not all information required to process an application will be from statutory consultees. There will be occasions when non-statutory consultees e.g. the Environmental health section of the Council, need to be consulted.

It may also include external organisations and bodies. These consultees are not bound by the 21 day response time, however, they are encouraged to respond in a timely manner so as not to delay the planning process.

Due to the wide range of development proposals submitted to Council, each application will be carefully considered and consultations will be undertaken in line with statutory requirements. The need for consultation will vary between applications depending on the nature and scale of the proposal.

### Appendix D – Local Development Plan Process

The speech bubble indicates when you can have your say.



Draft SCI issued for public consultation.

Preferred Options Paper published for public comment.

Public exhibitions held, opportunity to review proposals and make representations on the draft Plan Strategy.

All representations made available for inspection. Opportunity to make counter-representations.

Opportunity to have your representation and/or counter representation considered at the Independent Examination.

Publication of The Plan Strategy, Dfl's Direction and Independent Examiners Report.

Public exhibitions held, opportunity to review proposals and make representations on the new draft Local Policies Plan.

All representations made available for inspection. Opportunity to make counter-representations.

Opportunity to have your representation and/or counter representation considered at the Independent Examination.

Publication of The Local Policies Plan, Dfl's Direction and Independent Examiners Report.

## Appendix E – Planning Application Process

The speech bubble indicates when you can have your say.

Pre-application



The Council encourages applicants to undertake pre-application community consultation with the community. In the case of major applications community consultation is mandatory.

Application



The Council will accept or decline the application based on validation criteria.

Advertising &  
Neighbour  
Notification



Plans published online on the Planning Portal. Neighbours notified. Statutory consultees and other relevant bodies invited to make comments. Press advert in local newspapers.

Written and emailed comments can be submitted both during the advertising/neighbour notification period and during the consultation period.

When responding it is important that your response relates to planning matters known as material considerations. Some examples of material and non-material considerations can be found in Appendix D.

Application  
Review



Consultee comments and any comments from third parties can be viewed online via the planning portal

Officer Report



The case officer prepares a report on the application and provides a recommendation.

Decision



The decision will be made by the Chief Planning Officer or the Planning Committee .

If the application is decided by the Planning Committee the applicant and those who have made representations will be afforded the opportunity to speak at the Planning Committee in line with the Planning Committee Operating Protocol.

Decision Notice

Issued

The decision will be sent to the applicant or agent. It will then be published on the planning portal



## Appendix F Material and Non-Material considerations

There is no legal definition for material definitions, however they are held to include all the fundamental factors involved in land-use planning. Essentially a material consideration is one which is relevant to making a planning decision as to whether to grant or refuse an application for planning permission. Material considerations will vary depending on the specific circumstances of each case.

Generally greater weight is attached to issues raised which are supported by evidence rather than solely by assertion.

The lists below provide some examples of material and non-material considerations however it should be noted that these are not exhaustive lists.

### Material considerations

#### Can be taken into account

- Regional and local Planning Policies.
- Adopted and emerging Development Plans.
- Planning history on the site
- Case law.
- Loss of sunlight and overshadowing.
- Overlooking and loss of privacy.
- Roads issues (e.g. increased traffic movements).
- Layout, density, design/appearance, character.
- Effect on a listed building or conservation area.
- Noise, smell or other disturbances.
- Cumulative impact.
- Capacity of infrastructure.

### Non-material considerations

#### Cannot be taken into account

- Private issues between neighbours.
- Opposition to business competition.
- Loss of property value.
- Loss of view.
- Moral objection.
- History of the applicant.
- Matters covered by other legislation.
- Restrictive covenants.
- Opposition to the principle of development if permission has been granted by an outline application or on appeal.

## **Appendix G – List of Local Newspapers for Advertisement**

Local Newspapers which the Council currently advertises planning applications in (weekly):

- Armagh & Down Observer
- Crossmaglen Examiner
- Down Recorder
- Mourne Observer
- Newry Reporter

<b>Report to:</b>	<b>Planning Committee</b>
<b>Subject:</b>	Newry, Mourne and Down Local Development Plan Preparatory Studies Paper 7: Tourism
<b>Date:</b>	2 February 2017
<b>Reporting Officer:</b>	Anthony McKay, Chief Planning Officer
<b>Contact Officer:</b>	Andrew Hay, Principal Planning Officer

### **Decisions Required**

Note the content of this report.

#### **1.0 Purpose & Background**

- 1.1 A programme of preparatory work is being undertaken as part of the Local Development Plan (LDP) process. Preparatory studies are essential in providing the evidence base for preparing the Local Development Plan (LDP). A reliable and comprehensive evidence base is vital to informing and justifying the 'soundness' of the LDP documents (Plan Strategy and Local Policies Plan) and to show how planning policies and proposals help to achieve the social, economic and environmental objectives for the plan area.
- 1.2 The SPR Committee is responsible for the Local Development Plan. All LDP papers are reported to the SPR Committee for noting or decision. All LDP papers will also be presented to the Planning Committee for noting. Depending on the subject matter, a LDP paper will also be presented to any other relevant Council Committee for noting.
- 1.3 'Paper 7: Tourism' was reported to the SPR Committee on 19/1/17, and given the subject matter, it has also been presented to the ERT Committee on 16/1/17.
- 1.4 The paper provides members with an overview of matters relating to tourism in the Newry, Mourne and Down District Council area, including the area's tourism assets and growth areas.
- 1.5 The paper builds on the existing evidence base and provides information on:
- The regional policy context for tourism;
  - The key Government Department, agencies and other bodies with a role in tourism in Northern Ireland and their related strategies and plans;
  - An overview of tourism policy within the existing local area plans and masterplans;
  - An overview of the tourism base and growth areas in Newry, Mourne and Down; and
  - Key findings and conclusions.
- 1.6 Members are asked to note the content of this report. Any comments received will be considered. The paper will be subject to any changes considered necessary in response to any valid comments received at this or any other Committee to which it is presented.



2.0	<b><u>Key Issues</u></b>
2.1	'Paper 7: Tourism' informs members about tourism within the District, by providing information on the existing tourism infrastructure and current and proposed tourism initiatives. This will assist the Council in the development of the LDP.
2.2	The paper allows members to commence consideration of the priorities for formulating a sustainable tourism policy, in the context of planning and the LDP, to grow tourism in a manner which, in line with the Regional Development Strategy (RDS), balances the economic benefits of tourism with the environmental and social impacts.
2.3	Through utilising existing environmental, historical, cultural and geographic assets, tourism can be a key economic driver capable of stimulating further growth and development opportunities. Tourism can benefit the assets on which it depends for example through assisting in the financing of conservation or enhancement initiatives. In towns and cities, tourism can contribute positively to urban regeneration. In rural areas tourism is important to the development of the rural economy by offering, for example, opportunities for farm diversification.
2.4	Sustainable tourism development is brought about by balancing the needs of tourists and the tourism industry along with protecting the assets of the destination. This requires management and the land use planning system has a key role in managing tourism-related development through planning policies that provide a framework for identifying appropriate development opportunities and safeguarding tourism assets from harmful development.
2.5	The information gathered and the key findings will be used to inform the preparation of the LDP. The LDP will also take account of the Council's Community Plan and Tourism Strategy.
2.6	The LDP will contain policies to safeguard tourist assets, together with policies for tourism development such as tourist accommodation and amenity facilities, and the criteria for consideration of such proposals.
2.7	In accordance with the RDS, the LDP will promote a sustainable approach to the provision of tourism infrastructure to conserve, protect and where possible enhance the District's natural environment and built heritage.
2.8	Data gathered as part of this and other preparatory studies will be used to establish the baseline of the social, economic, and environmental characteristics of the plan area and enable the Council to identify the issues which need to be addressed by the LDP. Furthermore, it will provide a sound basis on which to formulate the plan strategy, policies and proposals within the LDP that will be subject to independent public examination.
3.0	<b><u>Recommendations</u></b>
3.1	Members are requested to note the content of this report.
4.0	<b><u>Resource Implications</u></b>
4.1	N/A
5.0	<b><u>Appendices</u></b>
	<ul style="list-style-type: none"> <li>• Paper 7: Tourism</li> </ul>



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin

**Newry, Mourne  
and Down**  
District Council

**Local Development Plan  
Preparatory Studies**

**Paper 7: Tourism**

**January 2017**





<b>Contents</b>	<b>Page Number</b>
<b>Purpose and Content</b>	2
<b>1.0 Introduction</b>	3
<b>2.0 Regional and Local Policy Context</b>	
(a) Programme for Government 2011-2015 (PfG)	4
(b) The Regional Development Strategy 2035 (RDS)	5
(c) Strategic Planning Policy Statement (SPPS)	6
(d) Planning Policy Statements (PPSs)	6
(e) Newry, Mourne and Down District Council Corporate Plan	7
(f) Newry, Mourne and Down District Council Draft Community Plan	7
(g) Newry, Mourne and Down District Council Draft Tourism Strategy	8
<b>3.0 Area Plans and Master Plans</b>	
Ards and Down Area Plan 2015	9
Banbridge/Newry and Mourne Area Plan 2015	9
Downpatrick Masterplan	10
Ballynahinch Masterplan	11
Newry City Masterplan	12
South East Coast Masterplan	13
<b>4.0 Departments, Agencies and Organisations with roles regarding tourism</b>	
(a) Department of Enterprise, Trade and Investment (DETI) now Department for the Economy (DfE)	15
(b) Department of Agriculture and Rural Affairs (DARD) now Department of Agriculture, Environment and Rural Affairs (DAERA)	16
(c) Department of the Environment (DoE) now Department for Communities (DfC) and DAERA	16
(d) Department of Culture, Arts and Leisure (DCAL) now Department for Communities (DfC)	18
(e) Department for Social Development (DSD) now Department for Communities (DfC)	19
(f) Department for Education and Learning (DEL) now Department for the Economy (DfE)	19
(g) National Trust	19
<b>5.0 Northern Ireland and Newry, Mourne and Down Tourism Industry</b>	20

<b>6.0 Newry, Mourne and Down Tourism Assets</b>	
Activity Tourism	28
-Golf	28
-Angling	29
-Hiking and Walking	29
-Mountain Biking	30
-Watersports	30
-Activity Centres	31
Cultural Tourism	31
-Built Heritage	32
-Natural Heritage	32
-Christian Heritage	33
-Festivals and Events	34
-Food Tourism	35
-Screen	35
-Theatre	35
-Literature	36
-Pubs and Nightclubs	36
Visitor Information Centres	36
<b>7.0 Key Findings and Conclusions</b>	37
Appendix 1 National Trust Assets	40
Appendix 2 Country Parks, Parks and Forests	42
Appendix 3 Beaches	46
Appendix 4 Activity Centres	48
Appendix 5 Children and Family	50
Appendix 6 Festivals and Events	52

**Purpose:** To provide Newry, Mourne and Down District Council with an overview of Tourism in the district including the area's tourism assets and growth areas and how this fits in the context of regional and local plans.

**Content:** The paper provides:

- i. An overview of the regional policy context for tourism.
- ii. Identification of Key Departments, Agencies and bodies with a role in tourism in Northern Ireland and their related strategies and plans;
- iii. An overview of tourism policy within existing local area plans and masterplans;
- iv. An overview of the tourism base and growth areas in Newry, Mourne and Down; and
- v. Key Findings and conclusions



## 1.0 Introduction

- 1.1 The purpose of this paper is to inform members about tourism within the District, by providing information on the existing tourism infrastructure and current and proposed tourism initiatives. This will assist the Council in the development of the Local Development Plan (LDP). It also provides an overview of regional planning and policy context in relation to tourism and includes other Government policy objectives in relation to this key sector, namely; the NI Executives Programme for Government 2011-15 (PfG), the Economic Strategy (2012), the Draft Tourism Strategy (2010) and the Council's vision taken from its Corporate Strategy (2015-2019) in addition to the current Draft Community Plan and Draft Tourism Strategy. It also identifies a number of key Departments, agencies and bodies with a tourism role in Northern Ireland and provides an overview of their strategies and plans for the District.
- 1.2 The paper allows members to commence consideration of the priorities for formulating a sustainable tourism policy in the context of Planning and the LDP to grow tourism in a manner which, in line with the Regional Development Strategy (RDS), balances the economic benefits of tourism with the environmental and social impacts.
- 1.3 There was a downgrade to the global Travel & Tourism outlook for 2016, compared to the forecast reported in 2015, with direct Travel & Tourism Gross Domestic Product (GDP) now expected to grow by 3.3%. This is in line with macro economy revisions (the world GDP growth forecast for 2016 is down from 3.1% last year to 2.8% under current forecasts). Despite this downgrade, Travel & Tourism sector growth is still expected to outpace global economic growth for the sixth consecutive year.
- 1.4 Tourism statistics published by NISRA show that in the year to June 2016 visitors spent £789m in the NI local economy with 72% coming from external visitors - making tourism worth £571m as an export business. This is an increase of 5% in overall visitor spend when compared to the year to June 2015. Figures indicate that visitors have generally been staying longer and spending more leading to an increase in overall visitor expenditure in both the first half of 2016 and the year to June 2016. The increases in nights and spend have been driven by a continued increase in external visitors particularly from GB and overseas. Total visitor numbers fell slightly during January to June 2016 driven mostly by falls in domestic overnight trips.
- 1.5 Through utilising existing environmental, historical, cultural and geographic assets, tourism can be a key economic driver capable of stimulating further growth and development opportunities. Tourism can benefit the assets on which it depends for example through assisting in the financing of conservation or enhancement initiatives. In towns and cities tourism can contribute positively to urban regeneration. In rural areas, tourism is important to the development of the rural economy by offering, for example, opportunities for farm diversification.

- 1.6 The World Tourism Organisation (WTO) promotes sustainable tourism and defines this as: *"tourism that meets the needs of present tourists and host regions while protecting and enhancing opportunity for the future"*. It goes on to state that: *" the objective of sustainable tourism is to retain the economic and social advantages of tourism development while reducing or mitigating any undesirable impacts on the natural, historic, cultural or social environment."*
- 1.7 Sustainable tourism development is brought about by balancing the needs of tourists and the tourism industry along with protecting the assets of the destination. This requires management and the land use planning system has a key role in managing tourism-related development through planning policies that provide a framework for identifying appropriate development opportunities and safeguarding tourism assets from harmful development.

## **2.0 Regional and Local Policy Context**

### *(a) Programme for Government 2011-2015 (PfG)*

- 2.1 On 12 March 2012, the First Minister and Deputy First Minister (OFMDFM) published the Programme for Government: Building a Better Future. Included within the key commitments and strategic priorities set out for the Assembly term 2011 to 2015 is a key commitment to increase visitor numbers from 3.2 million to 4.2 million and tourist revenue to £676 million by December 2014. Through various Government Department Strategies, frameworks have been put in place to achieve the aims underpinning the PfG, which is to grow a sustainable economy, invest in the future, tackle disadvantage, improve health and wellbeing, protect people and the environment, build a strong and shared community and deliver high quality services. The Government therefore recognises the potential of the tourism industry to deliver significant economic growth in the future.
- 2.2 A draft PfG 2016-2021 was published on 28 October 2016 and was out for consultation until 23 December 2016. It recognises the economic importance of tourism and the huge growth potential in the tourism and hospitality industry. One of the key indicators is 'to improve our attractiveness as a destination' and will be measured by the 'total spend by external visitors'.
- 2.3 Aligned with the PfG the former Department for Enterprise, Trade and Investment (DETI) published the 'Economic Strategy: Priorities for Sustainable Growth and Prosperity' on 13<sup>th</sup> March 2012. The Strategy sets out the economic vision including a framework for growth and key priorities for growth and prosperity.
- 2.4 The Strategy reaffirms the PfG and includes developing the potential of the tourism industry through focusing investment on strategically significant areas and developing the quality of the visitor experience. The Strategy sets a collective goal for the sector to double the income earned from tourism by 2020.
- 2.5 DETI also published a draft Tourism Strategy for Northern Ireland to 2020 which is outlined in section 4 of this paper.

*(b) The Regional Development Strategy 2035 (RDS)*

- 2.6 The Regional Development Strategy 2035 was published in March 2012. It provides an overarching strategic planning framework to facilitate and guide the public and private sectors and ultimately shall influence Council decisions and investments for years to come. The RDS aims to protect and enhance the environment for current and future generations. It recognises that Northern Ireland's environment is one of its greatest assets which benefits in terms of the economy and quality of life. All new plans and planning policies must take account of the RDS. The following Regional Guidance (RG) in the RDS is relevant to this paper:
- 2.7 RG 4 – Promote a sustainable approach to the provision of tourism infrastructure by:
- Promoting a balanced approach that safeguards tourism infrastructure while benefiting society and the economy;
  - Improving facilities for tourists in support of the Tourist Signature Destinations, including The Mournes and the St. Patrick and Christian Heritage Trail, as identified in the former Department for Enterprise, Trade and Investment's draft Tourism Strategy 2010;
  - Encouraging environmentally sustainable tourism development.
- 2.8 RG 11 – Conserve, protect and, where possible, enhance our built heritage and our natural environment – which are key assets for attracting tourism and would continue to make a valuable contribution to our Tourism economy, as well as to the wider environment and society.
- 2.9 The spatial framework of the RDS identifies The Mournes, Strangford Lough and Coast and the Ring of Gullion as Strategic Natural Resources. It identifies Newry as a main hub and as the South Eastern City gateway due to its land border with the ROI and the major port of Warrenpoint which it has potential to cluster with. It also has potential to cluster with Dundalk given that both are located on the Belfast-Dublin corridor.
- 2.10 The RDS also recognises Downpatrick as a key tourism centre of regional significance due to its historical and archaeological interest largely connected to St Patrick. It notes it has potential to cluster with Newcastle which, with its surrounding natural landscape, has year round activity based tourism opportunities for walking, climbing, fishing, cycling and golf. However, it notes that Newcastle's location positioned between 2 Special Areas of Conservation, the Eastern Mournes and Murlough National Nature Reserve means that any development in and around the town needs to take account of the potential environmental impact.
- 2.11 The RDS also recognises that the expansion of rural tourism and associated development that is both sustainable and environmentally sensitive should be encouraged as it can provide further jobs and opportunities in rural areas (SFG13).



*(c) Strategic Planning Policy Statement (SPPS)*

- 2.12 The Strategic Planning Policy Statement for Northern Ireland (SPPS) was published on the 28<sup>th</sup> September 2015. The SPPS reduces 20 separate planning policy statements to one. This provides the policy on key issues including tourism.
- 2.13 The Regional Strategic Objectives for tourism are:
- Facilitate sustainable tourism development in an environmentally sensitive manner;
  - Contribute to the growth of the regional economy by facilitating tourism growth;
  - Safeguard tourism assets from inappropriate development;
  - Utilise and develop the tourism potential of settlements by facilitating tourism development of an appropriate nature, location and scale;
  - Sustain a vibrant rural community by supporting tourism development of an appropriate nature, location and scale in rural areas; and
  - Ensure a high standard of quality and design for all tourism development.
- 2.14 In preparing Local Development Plans (LDPs) the SPPS recommends that Councils should consider how best to facilitate the growth of sustainable tourism in their areas and bring forward a Tourism Strategy. This will be tailored to the needs and assets of their local area and informed by early engagement with relevant stakeholders. Such a strategy should reflect the wider Government tourism initiatives (e.g. Signature Destinations) and may address the following: how future tourism demand is best accommodated; safeguarding the key tourism assets; identification of potential tourism growth areas; environmental considerations; and contribution of tourism to economic development conservation and urban regeneration.
- 2.15 The SPPS states that policies to safeguard tourist assets will be contained in the LDP, together with policies for tourism development such as tourism accommodation, amenity facilities, and holiday parks, and the criteria for consideration of such proposals. There should be a general presumption in favour of tourism development within settlements.
- 2.16 In the countryside there is a need, in the interests of rural amenity, and wider sustainability objectives, to manage the level of new build for tourism purposes. The guiding principle should be to facilitate tourism development where it supports rural communities and promotes a healthy rural economy and tourism sector.

*(d) Planning Policy Statements (PPSs)*

- 2.17 Planning Policy Statement 16 Tourism (PPS 16) was published in 2013 and is the main planning policy document relating to tourism development. It aims to manage the provision of sustainable and high quality tourism developments in appropriate locations within the built and natural environment and shares the objectives of the

SPPS. PPS16 allows for: appropriate tourism development in settlements; tourist amenities in the countryside where it is in association with a particular tourism attraction or the activity itself requires a countryside location; hotel, guest house and tourist hostels in the countryside where it replaces an existing rural building or new build on the periphery of a settlement; major tourist development in the countryside in defined exceptional circumstances; and self-catering accommodation in a number of scenarios.

- 2.18 Due to the importance of our natural and built heritage assets in relation to the tourism industry both Planning Policy Statement 2 Natural Heritage (PPS 2) and Planning Policy Statement 6 Planning, Archaeology and the Built Heritage (PPS 6) are frequent key policy considerations in planning applications for tourism. Other Planning Policy Statements that provide scope for tourism development in the countryside are Planning Policy Statement 8 Open Space, Sport and Outdoor Recreation (PPS 8) and Planning Policy Statement 21 Sustainable Development in the Countryside (PPS 21).

*(e) Newry, Mourne and Down District Council Corporate Plan*

- 2.19 The Council's mission as detailed in the Corporate Plan 2015-19 is to lead and serve a District that is prosperous, healthy, as well as sustainable from an economic, environmental and social perspective. The Council's responsibilities in relation to the environment will also play a key role in contributing to the tourism success of the District as well as making it an attractive place to live. The Corporate Plan recognises that the tourism potential is enormous in this district with three Areas of Outstanding Natural Beauty in Strangford & Lecale, Slieve Gullion, and the Mourne, numerous Blue Flag beaches, and an unrivalled link to St Patrick. The Council's challenge is to increase visitor numbers, dwell time and spend as part of an overall economic growth plan.

- 2.20 The Corporate Plan places a strong emphasis on tourism with a key strategic objective being:

*"By 2019 we will have become one of the premier tourism destinations on the island of Ireland".* Achievement of this ambitious objective depends, not only on the Council, but also on a wide range of businesses, organisations and individuals within the local area, and on statutory agencies that operate in the area.

- 2.21 The Council's 'Economic Regeneration and Investment Strategy 2015-2020' identifies tourism as one of five integrated themes. The tourism objectives of this strategy are to become the destination of choice in NI, to become NI's premier outdoor/ adventure destination and to become one of NI's finest events destinations.

*(f) Newry, Mourne and Down District Council Draft Community Plan 'Living Well Together'*

- 2.22 Community Planning came into operation on 1st April 2015 as part of the full implementation of local government reform. The new duty of community planning requires councils as the lead partner to be responsible for making arrangements for

community planning in their areas and it requires statutory bodies to participate in the process. The Council, statutory bodies and local communities will develop and implement a shared vision for promoting the well-being of the area, promoting community cohesion and improving the quality of life of its citizens.

- 2.23 The Community Plan is to be the overarching strategic plan for integrated planning and delivery of services in Newry, Mourne and Down. It provides a framework for the other strategies and plans the Council will put in place to contribute towards the outcomes in the community plan and it is based on a detailed analysis of future risks and opportunities for Newry, Mourne and Down.
- 2.24 A key outcome for the draft Community Plan is that all people in Newry, Mourne & Down benefit from prosperous communities. The level of tourism revenue in the District has been identified as indicator for achieving this outcome with the level of overnight visitors, average spend per trip by visitors and hotel occupancy level being used to measure progress.
- 2.25 The Local Government Act (2014) introduced a statutory link between the community plan and a Council's Local Development Plan. The preparation of the LDP must take account of the community plan. It is intended that the LDP will be the spatial reflection of the community plan and that the two should work in tandem towards the same vision for a council area and its communities and set the long term social, economic and environmental objectives for an area.

(g) Newry, Mourne and Down Draft Tourism Strategy 2017-2021

- 2.26 The Council published its Draft Tourism Strategy for the District in December 2016. It is a 5 year strategy that sets out the strategic direction for the tourism industry within the District. The draft strategy aims to build upon the strengths and opportunities of the district and overcome the challenges by:
- developing EPIC (Experiential, Personalised, Iconic and Immersive and Creative) moments,
  - Building a unified and entrepreneurial industry that is customer focused,
  - Ensuring the development of tourism is undertaken sustainably and contributes to the enhancement of social, cultural and environmental values.
- 2.27 The vision of the draft strategy is: By 2021 *'NMD is a premier, year-round mountain and maritime destination in Ireland recognised for its EPIC experiences in outdoor adventure, its rich tapestry of cultural heritage, myths and unique stories, and its authentic local life'*.
- 2.28 The strategic framework of the draft strategy seeks to target the GB and overseas market segments that are identified as the best prospects for international tourism growth at NI level and within NMD ie. the 'Culturally Curious', 'Great Escapers' and 'Social Engineers' with the development of the area as a 'destination under the headline of 'Mountains, Myths and Maritime'.



## 2.29 The Destination Experiences are:

- The Mourne- Gullion Experience- catalyst projects include applying to UNESCO for Geopark designation for Mourne, Slieve Croob AONB and Gullion AONB; Newcastle uplift facility to higher Mournes; Lift assisted access for mountain biking and expanding training facilities and capacity; The Newry Canal 'Blueway' opportunity to open the canal to small boats and canoes between Pontzpass and Lough Neagh (21miles); and connecting with the Great Eastern Greenway to link Newry and Carlingford (approx. 13.8miles).
- The Mourne Coastal Experience- catalyst projects include improving access to water and a focus on coastal flavours.
- Gateway Communities- the strategy recognises the role of towns and villages in the creation of the destination. It identifies Downpatrick, Newcastle, Newry, Warrenpoint/ Rostrevor and Crossmaglen as gateway and hub communities. It aims to build upon the existing masterplans for these communities (which, with the exception of Crossmaglen, are outlined in section 3 below). The draft strategy notes Crossmaglen is a strategic gateway into NMD from South Armagh and has a stronger association with the 'Story of Ireland' and its myths and legends than many other established destinations in NMD or indeed Ireland. It aims to continue to build the local arts, culture and heritage along with outdoor recreation and water based activities.

## 3.0 Area Plans and Master Plans

- 3.1 The Ards and Down Area Plan 2015 and the Banbridge/Newry and Mourne Area Plan 2015 are the current statutory plans for the District and provide the framework against which to assess development proposals.

### **The Ards and Down Area Plan 2015 (ADAP)**

- 3.2 The ADAP recognises the District has excellent growth potential which rests firmly on the beauty of the landscapes and variety of interests and heritage features to be enjoyed. One of the Plan's principal objectives was to encourage the development of the District's tourism potential however no specific plan policies with regards to tourism development were included. It refers to the signature projects of St Patrick/ Christian Heritage and The Mournes and identifies Strangford Lough as a growth opportunity. The principal attractions of the District were listed as follows:
- Strangford Lough/St. Patrick's country
  - The Lecale Coast
  - Slieve Croob and the Mourne Mountains

### **The Banbridge/Newry and Mourne Area Plan 2015 (BNMAP)**

- 3.3 The BNMAPs overall Tourism Strategy includes the promotion of the development of sustainable tourism. This means facilitating tourist development in suitable locations without adversely impacting on environmental and man-made assets

which attract tourists. The Plan has not generally sought to designate local policy areas for tourism as proposals for tourism development will be considered in accordance with the prevailing regional policies. The plan offers no specific plan policies with regards to tourism development in the area. It does however note cross border trade and shopping as a growth opportunity. It also notes development opportunity sites were identified to accommodate tourist and leisure facilities in towns.

- 3.4 Newry City and the five main towns within the District also have their own Town Centre Masterplans which were completed by the former Department for Social Development (DSD) in conjunction with the local government and concerned with urban regeneration initiatives in each respective town centre.

### **Downpatrick Masterplan**

- 3.5 The Downpatrick Masterplan was published in July 2010. The Masterplan focuses on achieving the agreed vision for the town by 2030, which is that *"Downpatrick will be rejuvenated as an energetic, vibrant and forward-thinking Town in which all its residents can take pride. Its unique historic environment, particularly its early Christian heritage, will be leveraged and complemented by exemplary development, establishing Downpatrick as a special visitor destination. The Town and surrounding area will also take advantage of its natural setting. Its buildings, streets and spaces will be attractive, safe and friendly, providing a focus for community life and an attraction to the increasing numbers who visit"*.
- 3.6 The Masterplan states that Downpatrick has an immensely rich heritage and is also blessed with substantial qualities in its natural environment. As such it considers the Town to have enormous potential to become one of the leading tourist destinations in the UK and Ireland. However, it noted that analysis found that visitors stay for very short periods of time and do not explore the historic Town beyond the Cathedral and Saint Patrick Centre. The limited hotel accommodation in Downpatrick was identified and it was deemed necessary to address this to encourage longer visits from tourists. The evening economy was also noted as being in need of improvement.
- 3.7 The Masterplan states that tourism development will be comprehensively supported through the development of the Town's heritage offer as well as wider environmental, transport and retail developments. It intends that tourism should be the primary driver of the rejuvenation of the Town Centre. It recognises that making the most of the Town's rich cultural and historic assets to grow a sustainable visitor economy will be a challenge and it sets out an ambitious plan to achieve this.
- 3.8 The main proposals in the Downpatrick masterplan included:
- A major new retail development in the Grove area to create a first class shopping environment in the heart of Downpatrick;
  - New people friendly streets to improve linkage throughout the town;
  - Continued support for public realm improvements and development opportunity sites;

- Redevelopment of the Gaol site for schools and a hotel;
- A Quoile River Country Park. This will introduce a network of walking and cycling links between key destinations such as St Patrick's Centre, the Mound of Down and Inch Abbey with wetlands, boardwalks, greenways and linear parks;
- An extension of Quoile wetland and open water;
- Protection and enhancement of the Downpatrick and County Down Railway (NI's only standard gauge heritage railway) with extended railway lines, and;
- A range of proposals to reduce traffic congestion to make the town centre more accessible.

3.9 The Masterplan also notes that Downpatrick is well situated within a wealth of tourism opportunities many of which are located within Newry, Mourne and Down district including the St Patrick's Trail, Strangford Lough and the Mourne Mountains. It recognises the potential to capitalise more fully on this location.

### **Ballynahinch Masterplan**

3.10 The Ballynahinch Masterplan was published in October 2014. Like many towns and villages across Northern Ireland, Ballynahinch faces certain challenges such as difficult town centre trading, a lack of high quality public open space and town centre vehicular congestion. On the other hand, the strong sense of community, rich history, attractive main streets and wonderful surrounding landscape presents significant opportunities for this historic town.

3.11 The Masterplan was commissioned to help address these challenges and identify opportunities. It provides the format for taking a fresh look at the town in a holistic manner so that key aspects of its social, physical and economic character can be understood and appreciated.

3.12 Ballynahinch has a relatively limited tourism market. The pivotal focus of the town is the market square and market house which was built in 1795. A £2million Public Realm upgrade project completed in 2015 included the upgrade of the Square which plays a vital role within the Town.

3.13 Further development and expansion of the popular farmer's market provides an opportunity in tourism and food sectors and could attract more visitors and extend dwell time within the town with the promotion of the Town as a premier food destination. The evening economy within Ballynahinch is also somewhat limited.

3.14 The masterplan recognised the importance of conserving the built heritage and enhancing Ballynahinch's character. It identified the opportunity provided by the Drumlin landscape to provide public access and create a high quality parkland and a unique visitor attraction.

3.15 The main proposals included;

- Providing access to the Drumlins to create a high quality parkland and a unique visitor attraction,
- Refurbish historic buildings and monuments such as the Old Mill and ruins of the Old Windmill and co-ordinate themed events from them.



- Bypass to reduce congestion,
- Develop and promote an events programme promoting the history of the Town (Battle of Ballynahinch, The historic market and the old railway) to increase footfall and potential spend.
- Improved public realm and frontage improvements,
- New street and river park
- LOTS (living over the shop) to increase vibrancy and occupancy, and;
- Proposes exploring the merit of designating a Town Centre Conservation Area.

### **Newry City Masterplan**

- 3.16 The Masterplan for Newry was published in October 2011 and is a key reference for regeneration and development decisions relating to Newry City Centre over a 10 – 15 year period. It sets out short, medium and long term actions that will enable the City to achieve its aims and objectives. Tourism is key to a number of these including: realising Newry's potential as an international tourist destination as a hub to explore the wider area; capitalising upon its role as a gateway to the island of Ireland from the sea and to NI via its land border; keeping the city centre as vibrant as possible, and; sustaining its role as a retail destination.
- 3.17 It recognises that Newry's location and surrounding rich landscape is ideally suited to tourism. It has excellent transport connectivity with Belfast and Dublin (and their three airports) with both being accessible by road and rail within almost an hour. Warrenpoint Harbour immediately to the south is also becoming an increasingly important freight terminal (following the publishing of the masterplan the port has also been docked at by three cruise ships). While it is set within a particularly attractive landscape with the Mourne, Gullion and Cooley Mountain ranges all within close proximity, along with the dramatic Carlingford Lough a few kilometres to the south. It also notes that the city performs relatively well in retail benefitting from its cross border catchment area.
- 3.18 However, it also noted the city faces a number of challenges such as the survival of independent retail alongside high street chains, the successful accommodation of vehicles whilst maintaining environmental quality and the means by which to prevent its older buildings falling into disrepair.
- 3.19 The Masterplan proposals for the city centre included:
- Creating a world class waterfront by capitalising on the Clanrye river and the Newry canal that runs through the city centre. This was to include the re-opening of the Newry Canal to boat traffic as part of a national connection between Lough Neagh and Carlingford Lough with a view to bringing an influx of visitors and building upon the success of the canals towpath which is recorded as one of Ireland's most visited attractions;
  - Nurturing a unique, creative quarter for the arts and culture around the Town Hall, Basin Quay and the Arts Centre;
  - Regenerating Newry's primary streets including Hill Street and Abbey Way with public realm upgrades and improving the connections from attractions such as Bagenal's Castle and St Patrick's Cathedral with the rest of the city centre;

- Revitalising key areas through health and education at Monaghan Street and Upper Edward Street;
- Establishing a new network of city parks to include commissioning archaeological works at Heather Park with a view towards a potential tourist attraction based on its location on Gallows Hill where public hangings traditionally took place;
- Integrating the Buttercrane and the Quays into the city centre as evidence suggests visitors fail to visit other parts of the city centre, and;
- Developing a new flagship city quarter comprised of high-quality mixed-use development in the Albert Basin.

### 3.20 Other city wide proposals included:

- Developing a policy to afford a degree of protection to the setting of Newry's City Centre from inappropriate development given the visual prominence of the valley slopes;
- Newry super greenway to link the majority of Newry's neighbourhoods with each-other and the city centre, and;
- A number of initiatives aimed at reducing congestion in the city e.g the Southern Relief Road to link Warrenpoint Road and A1 bypass, city centre gateway car parks and additional signage.

### **South East Coast Masterplan**

3.21 The Masterplan for the South East Coast was published in January 2013. It provides guidance on the future strategic development of the South East Coast as well as specific guidance on the location and form of development in the Town Centres of Newcastle, Kilkeel and Warrenpoint over the next 20 years.

3.22 The South East Coast Masterplan vision is *"to become an area with a strong national and international reputation for being a high quality coastal landscape of great scenic, natural, historic and leisure value; and an area that provides an enjoyable place to live, to work, to explore, and to play in"*.

3.23 The delivery of this statement is to be achieved by enabling the key towns of Newcastle, Kilkeel and Warrenpoint to collectively and individually embrace and prosper from their association with both their coastal setting and the wider character of the Mourne Mountains as an Area of Outstanding Natural Beauty. It takes account of the Mourne Coastal Trail which is part of the Northern Ireland Tourist Board and former DETI's strategic approach to developing the Mournes as a signature destination and aims to develop a distinctive proposition for each of the centres to entice visitors.

### 3.24 The proposals included:

- In Newcastle, the plan proposes to build on the success of the new promenade by expanding the range of beachside activities available, showcasing local arts and crafts talents, introducing new play areas and establishing a programme of annual events; all of which will be designed to encourage overnight stays and extend the tourism season. It also notes the

development of the proposed 'Donard Gondola', as a premier tourist attraction will allow all visitors to explore and enjoy the Mourne Mountains.

- In Killeel, home to one of the largest fishing fleets on the island of Ireland, the plan proposes to promote the working harbour as an attraction for tourists to visit and experience the fish market for themselves. The redevelopment of the Nautilus Centre which incorporates a seafood cookery school, a maritime visitor attraction and tourist office will be complemented by the promotion and development of the profile of Killeel's seafood to international recognition. Creating a new improved state of the art play park and improved esplanade and access points to the beach will help to drive year round interest in the town.

The masterplan also references 'Sustainable Killeel 2020' that identifies new opportunities for fishing and engineering sectors. It states that developments in the fishing, renewable energy and aquaculture sectors should take account of Killeel as a centre for tourism and help the region develop as a centre for eco-tourism.

- In Warrenpoint, the plan seeks to promote and develop the town's reputation as a hub for watersports and activities, utilising its location on Carlingford Lough. Developing a marina would be a major attraction for the town as it would support boat trips and visiting cruise ships. While extending the promenade would link the Town Square and retail hub to the water's edge. The plan also seeks to revitalise the public spaces within the town centre, creating event space and making it more attractive, people friendly and less car dominated.

- 3.25 The town centre initiatives detailed in the Masterplan include shop front improvement schemes, retail performance programmes, development of vacant and derelict sites, introduction of town centre markets, restore projects, town centre revitalisation projects, urban development grants, vacant unit animation schemes, and a purple flag programme focusing on entertainment and hospitality.
- 3.26 The potential of the proposed Narrow Water Bridge to open up the entire South East corner for tourism was noted as significant while the potential for additional cross border tourism generated from plans for a new car ferry from Greencastle, Co. Down to Greenore, Co Louth was noted.



#### 4.0 Departments, Agencies and Organisations with roles regarding tourism

*(a) Department for Enterprise, Trade and Investment (DETI) now Department for the Economy (DfE).*

- 4.1 The Department for the Economy is the key player in the formulation and delivery of economic development policy in terms of tourism in Northern Ireland as it hosts Tourism NI (trading name of the NI Tourist Board). In February 2010, it published 'A Draft Tourism Strategy for Northern Ireland to 2020'. The aim was to provide strategic direction and targets for the development of NI's tourism experience to the year 2020 and a targeted Action Plan to deliver it. At the core of the strategy was the intention to grow income from visitor numbers with tourist revenue increased from £536 million in 2010 to £1 billion by 2020.
- 4.2 The Draft and associated Action Plan set out priorities for action under three pillars of People, Product and Places, and Promotion along with a cross-cutting theme of Partnership through a multi-stakeholder approach to lead and partner each action.
- 4.3 The Draft Tourism Strategy for Northern Ireland to 2020 identified nine key tourism destinations, two of which are applicable to the District:
- Mourne Mountains
  - Strangford Lough (St. Patricks Trail)

Each of these destinations also has a Management Plan. Both '*The Destination Mourne Mountains Management Plan 2013 – 2018*' and '*The Destination Strangford Lough Management Plan 2013 – 2018*' objectives are to maximise the potential to attract and encourage visitors to stay longer and spend more, by strengthening tourism performance and appeal across the whole of the plan areas.

- 4.4 The Draft Tourism Strategy for NI to 2020 was due to come into effect on 1<sup>st</sup> April 2011; however, it has not yet received clearance from the Executive due to the instigation of the Hunter Review- an independent review of the NI Tourist Board and wider tourism structures commissioned by DETI.
- 4.5 The Hunter Review was published in June 2014 which resulted in a rebranding of the NITB has since been rebranded to Tourism NI. The Review made a number of recommendations which fell into 3 themes:
- i. Setting the strategic direction for tourism
  - ii. Building closer relationships within the tourism sector; and
  - iii. Closer alignment with Invest NI.
- 4.6 It was anticipated that Tourism NI will have a much greater presence at local level, developing strong relationships and increasing its knowledge of the needs of local tourism partners particularly in light of the recent changes in local government which has seen Councils assume increased powers and responsibilities for Community Planning and Local Development Plans, including local economic development. Collaborative working with the new Councils and the establishment of

strong partnerships are considered essential ingredients for Tourism NI in order to maximise the tourism potential of each of the 9 Key Tourism Destinations.

*(b) Department for Agriculture and Rural Development (DARD) now Department of Agriculture, Environment and Rural Affairs (DAERA).*

- 4.7 Other Government Departments also play an important role in Tourism Development. DAERA is the overarching body responsible for the Forestry Service of NI and the Loughs Agency, each of which hold a role in the promotion of tourism in Northern Ireland through their management of important natural assets.
- 4.8 Forestry Service encourages access to, and the use of, forests within Northern Ireland, while at the same time protecting and conserving them and associated areas of special natural and heritage interest. Such uses include the sustainable use of timber but also includes maintenance of open access to forests for both recreational and tourism purposes.
- 4.9 DAERA also manage the Rural Development Programme (RDP) 2014 – 2020. The latest Rural Development Programme for Northern Ireland will run from 2014 – 2020 and a budget of up to £623 million has been agreed with the Northern Ireland Executive for its implementation. The RDP evaluates the current economic and social situation within the rural areas of Northern Ireland and as a result the document identifies key areas for support. One such area that is deemed worthy of support is the promotion of economic growth in rural areas by supporting rural businesses and rural tourism. This should be enabled by the observation and support of the following priorities as indicated in the RDP:
- Encouraging farm diversification in rural areas as a way of stimulating further income generation. The incidence of diversification is considerably lower in NI (10%) than is the case for England where, using a similar definition, about 18% of farms were found to have some diversified activity in 2010 (Source: DARD 2007 EU Farm Survey).
  - Encouraging tourism in rural areas.
  - Increasing recreational access to woodland.
  - Help preserve the cultural and social uniqueness and beauty of rural villages.
  - Promoting social inclusion, poverty reduction and economic development in rural areas.

*(c) Department of the Environment (DoE) now Department for Communities (DfC) and DAERA.*

-NIEA

- 4.10 The Department of the Environment (DoE) was responsible for the Northern Ireland Environment Agency (NIEA) which has a role to play in regards to tourism given

their role in the protection of our monuments and built heritage which are important tourism assets. This responsibility has now transferred to DfC while others noted below have transferred to DAERA.

- 4.11 The District has more than 280 scheduled sites and monuments protected under planning policy for their historical value. In addition, there are 42 State Care Monuments that are maintained for both public amenity and conservation. Monuments and sites in both urban and rural environments are a tangible link to our past; they hold information on how our predecessors lived. For this reason, they are fascinating places that we need to protect and cherish for future generations.

In Newry, Mourne and Down, these sites include:

- Ballykeel Dolmen and Cairn
- Slieve Gullion Passage Tomb
- Jordan's Castle, Ardglass
- Ballynoe Stone Circle
- Dundrum Castle
- Inch Abbey
- Narrow Water Castle
- Struell Bath Houses and Wells
- Loughinisland Churches

-Northern Ireland Biodiversity Strategy (NIBS)

- 4.12 The DoE's Northern Ireland Biodiversity Strategy (NIBS) 2005–2009, set out the Executives commitment to conserve and enhance Biodiversity whilst striving to halt Biodiversity Loss by 2016. The NIBS 2002 set out three recommendations for the Tourism Sector in Northern Ireland in regards to setting and impact on Biodiversity assets. These were;

- Prepare and implement integrated rural development, tourism development and environmental conservation strategies, where wildlife interests and tourist potential coincide.
- Implement Integrated Sensitivity Zones and carrying capacity estimates into all strategic and area planning



- Ensure that the impacts of recreational activities are well understood and that these impacts are ameliorated through the development of codes of conduct for individual recreational activities or bylaws.

- 4.13 The DoE published a new Biodiversity Strategy for Northern Ireland in July 2015. The mission statement of the strategy is '*To make progress towards halting overall biodiversity loss, establish an ecosystem approach and help business and society in general have a greater understanding of the benefits that nature can bring to everyday life in Northern Ireland*'. A number of the associated actions are due for completion by 2016 therefore the intention is to review the strategy following this. The review will look at what has been achieved, what has been successful and changing circumstances. It will identify key challenges and any new initiatives or threats that have emerged. Newry and Mourne Council published a Biodiversity Plan in 2009 and Down District Council published a plan in 2012.
- 4.14 The District contains a plethora of environmental assets. Among these assets are the Mourne, Strangford and Lecale and Ring of Gullion Areas of Outstanding Natural Beauty, the sand dune landscape at Murlough Nature Reserve and the wetland habitats and species found on Carlingford Lough. With 62 Areas of Special Scientific Interest, this region contains some of Northern Ireland's most precious natural environment features, habitats and wildlife. There are many more valuable assets located throughout the district, including those that are not given special protection. Magnificent beaches, such as Murlough, sensitive coastal habitat, forests like Tollymore – these and the area's many other open spaces all require similar attention so that we sensitively manage and utilise these assets to their full potential.

- Outdoor Recreation NI

- 4.15 The NIEA also supported (through competitive Natural Environment Fund Grant Programme) Outdoor Recreation NI, an umbrella organisation for Walk NI, Mountain Bike NI, Canoe NI and NI Orienteering to deliver a number of activity tourism projects which adds to the quality of the regions reputation as an activity holiday destination.

(d) Department for Culture, Arts and Leisure (DCAL) now Department for Communities (DfC)

- 4.16 The former Department of Culture, Arts and Leisure (DCAL) was the Government Department responsible for arts and creativity, museums, architecture and built environment policy and through its role in these fields has a direct hand in influencing cultural tourism to Northern Ireland and also through its role in the organisation of festivals and events. Many of its responsibilities have now transferred to the Department for Communities. The District benefits from facilities such as The St. Patrick's Centre in Downpatrick and Bagenals Castle in Newry,

which each have a dedicated Visitor Centre providing information about opportunities to explore the heritage and culture of the region and wider afield.

*(e) Department for Social Development (DSD) now Department for Communities (DfC)*

- 4.17 The former Department for Social Development (DSD) now Department for Communities (DfC) has strategic responsibility for urban regeneration and community and voluntary sector development amongst other roles. The Regional Development Office, a Department within DfC, is responsible for developing, promoting and implementing programmes to help regenerate towns and villages outside Belfast and the North West. Its responsibilities include town centre reinvigoration including comprehensive development schemes and environmental improvement schemes.

*(f) Department for Employment and Learning (DEL) now Department for the Economy (DfE)*

- 4.18 The Department for the Economy is responsible for the promotion of learning and skills in Northern Ireland and for policy in Further to Higher Education, Training and Employment Rights. The Department has a direct role in the provision of employees and employment opportunity in terms of appropriate skills and training, which in turn directly influences all aspects of the economy, including the Tourism Sector.
- 4.19 In recognition of the growth in the tourist sector, DEL established a "Future Skills Action Group" which brought together key stakeholders from the industry, to identify current and future skill trends and growth requirements for the industry. In April 2010, the "Hospitality and Tourism future Skills Action Group Review" was released. This document sets out an action plan to increase skills and training relating to tourism employment within Northern Ireland.

*(g) National Trust*

- 4.20 The National Trust is a conservation organisation with charitable status that works to preserve and protect historic places and spaces in the public interest. The Trust owns a number of heritage properties including historic houses, gardens and estates. It is one of the largest landowners in the UK, owning many beauty spots, many of which are open to the public free of charge. The Trust owns a number of properties in the District- Rowallane Gardens, Castle Ward, Strangford Lough, Murlough National Nature Reserve, The Mourne, and Derrymore House. (Additional information on these properties is included in Appendix 1).

## 5.0 Northern Ireland and Newry, Mourne and Down Tourism Industry

- 5.1 With a population of around 171,500 and a coastline of approximately 100 miles, the District is the third largest Council area in Northern Ireland. Although primarily made up of the former Newry & Mourne and Down District Council areas, the new Council also includes the electoral ward of Ballyward which has transferred from the former Banbridge District Council area.
- 5.2 The District is an area rich with tourism assets, natural beauty and cultural heritage. The juxtaposition of the Mourne Mountains and the sea is unique. The area also contains many of the provinces main tourist attractions; including the Mourne Mountains, Ring of Gullion, Slieve Croob, Kilbroney Park and Strangford Lough/St. Patrick's country.
- 5.3 The District has a great variety of places to visit including forest parks, historic houses and gardens, historic monuments and visitor centres. These offer opportunities for touring and diverse individual and recreational activities. As a result tourism within the area is based on both the natural and built heritage, which ranges from countryside, forest and coastline to conservation areas, historic buildings and ancient sites.
- 5.4 Tourism is an integral part of the local economy with the sector generating £54m in 2014 and £47.7m in 2015. In 2013 there was an estimated 4,780 tourism related jobs across the District accounting for 9.3% of total employee jobs within the District. Figure 1 below shows how this compared to the other Local Government Districts (LGDs) with the District being second only to Belfast in terms of the number of jobs in Tourism Characteristic Industries.

*Figure 1: Employee Jobs in Tourism Characteristic Industries in LGD's 2013*



Source: NISRA



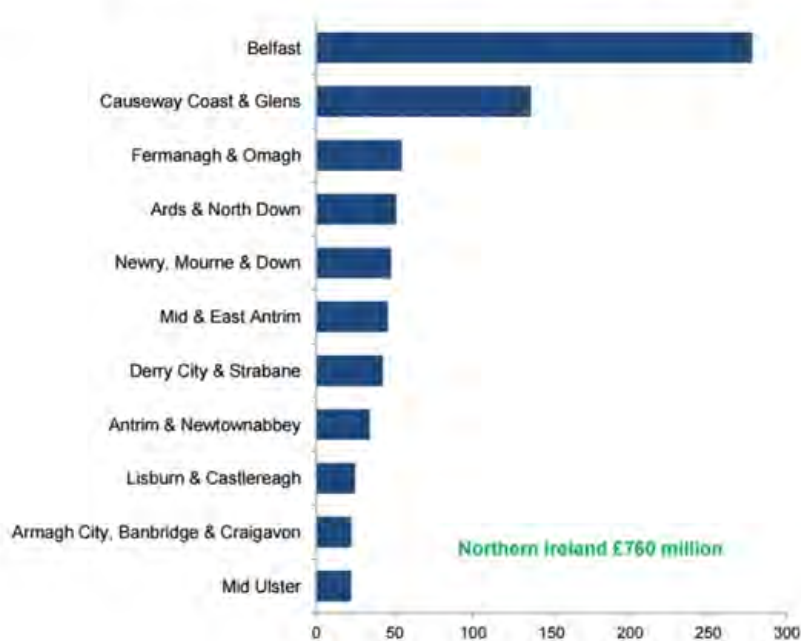
- 5.5 Figures released by the Northern Ireland Statistics & Research Agency (NISRA), coupled with Tourism NI research, show that 2015 was positive for the tourism sector. In 2015 there were 4.5 million overnight trips in Northern Ireland. This figure includes trips to Northern Ireland by external visitors and domestic trips taken by local residents. The number of overnight trips shows no change on 2014. Expenditure associated with these trips was £760million, up 1% on 2014. In 2015 overnight trips to Northern Ireland by external visitors stood at 2.3 million. This is the highest number on record and a 5% increase on 2014.
- 5.6 More than 400,000 visitors from overseas came to Northern Ireland during the first quarter of 2016, according to Tourism Ireland. The figures were compiled by NISRA and represent an 8% growth on figures from the same period last year. As well as the increase in overseas visitors, there has been a marked increase of 10% in revenues, which meant that £93m was brought into the local economy.
- 5.7 The strength of the tourism market in the District can be measured in terms of the number of trips, nights and spend. Figure 2 (below) shows the number of overnight trips, nights and expenditure in the District for 2012-2015. It shows that expenditure from overnight trips accounted for £47.7m in the District in 2015. Figure 3 (overleaf) shows how this compared to the 11 Local Government Districts (LDGs) with the District being ranked fifth. It also accounted for 6% of the overall spend in Northern Ireland. However, the average spend per overnight trip in the District was £118.03 compared to the Northern Ireland average of £168.60. As a result the District ranked last of the 11 Local Government Districts in terms of overnight expenditure per trip (NISRA, 2015). This suggests that the District attracts lower spending markets. Figure 4 (overleaf) shows that the District performed well in terms of the number of overnight trips with it being ranked third of all LGDs. However, despite having a high number of trips the average length of the trips at 2.6 nights is lower than NI average of 3.25 nights.

*Figure 2: Estimated no. of Overnight Trips/ Nights & Expenditure in Newry, Mourne and Down and Northern Ireland 2012-2015*

	2012		2013		2014		2015	
	NI	NMD	NI	NMD	NI	NMD	NI	NMD
<b>Trips</b>	4,024,505	454,092	4,069,440	453,109	4,513,136	571,000	4,531,618	404,442
<b>Nights</b>	13,857,763	1,424,090	14,393,835	1,464,543	15,082,371	1,488,281	15,470,769	1,056,896
<b>Spend</b>	£686.3m	£64.8m	£715.2m	£49.8m	£744.9m	£54m	£764.1m	£47.7m

*Source: Northern Ireland Passenger Survey*

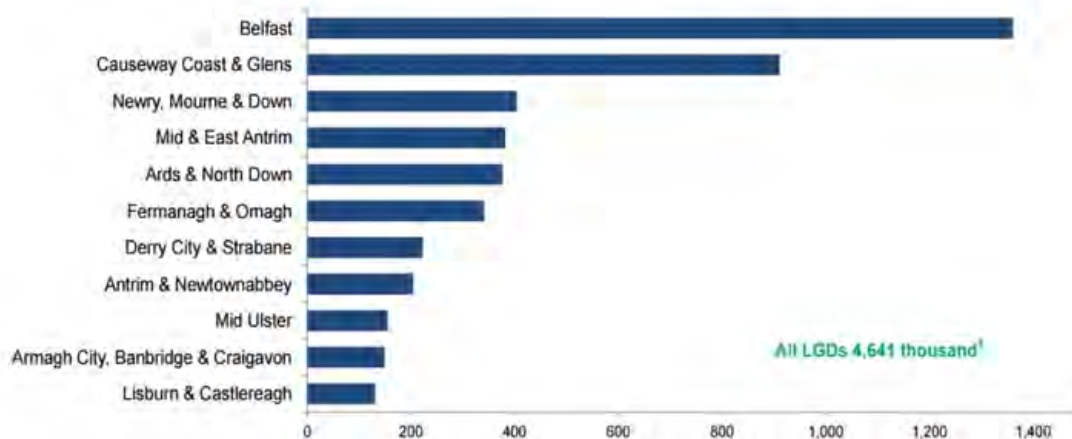
*Figure 3: Expenditure (£) on Overnight Trips by Local Government District, 2015*



Expenditure (£Million)

Source: Local Government District Tourism Statistics 2015, NISRA

*Figure 4: Overnight Trips by Local Government District (thousands), 2015*



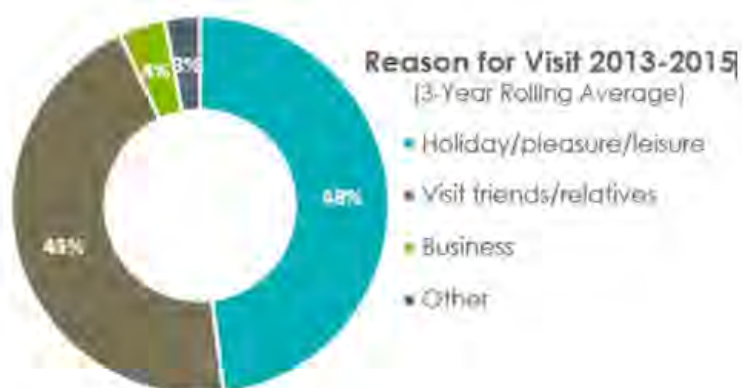
Overnight Trips (Thousands)

Source: NISRA, Northern Ireland Passenger Survey 2015



5.8 Figure 5 below shows the breakdown of the trips taken in the district and the reason for them. It shows that the top reason for an overnight stay in the District was for holiday/pleasure/leisure purposes with 48% of people visiting the District between 2013 and 2015 staying for this reason. This was above the Northern Ireland average of 44%. The second biggest reason for visiting was visiting friends or relatives at 45% again above the Northern Ireland average of 41%. The figure also shows that the District had a lower than the NI average number of people visiting for business purposes with only 4% of overnight trips being for this purpose compared to the NI average of 9%.

*Figure 5: Reasons for visiting in Newry, Mourne and Down, 2013-2015*

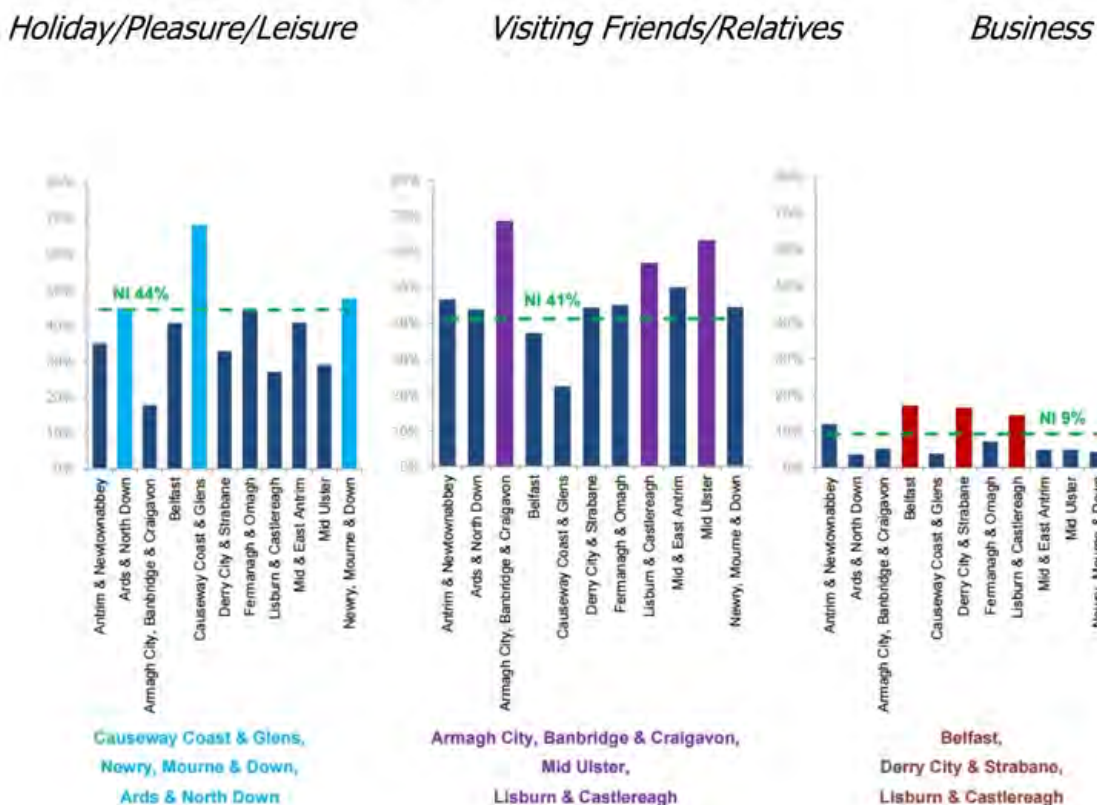


Source: NITB

5.9 The graphs overleaf (Figure 6) show the breakdown of the trips taken and the reasons for them for the 11 LGDs. It shows that the region is clearly a popular destination with people visiting for holiday/ pleasure/ leisure purposes with the district being ranked 2<sup>nd</sup> only to Belfast in this category. It also shows the district is ranked 7<sup>th</sup> and 9<sup>th</sup> respectively for the number of trips taken for visiting friends/relatives and business purposes.



*Figure 6: Reason for Overnight Trips in Northern Ireland within Local Government District (3 year rolling average)*



Source: Local Government District Tourism Statistics 2015, NISRA

5.10 As shown in Figure 7 below tourists from within NI account for the majority of the tourism market in the District with 66% of visitors during the period 2012-2015 coming from NI. It also shows 16% coming from GB, 13% from ROI and the remaining 6% share being from mainland Europe and North America combined.

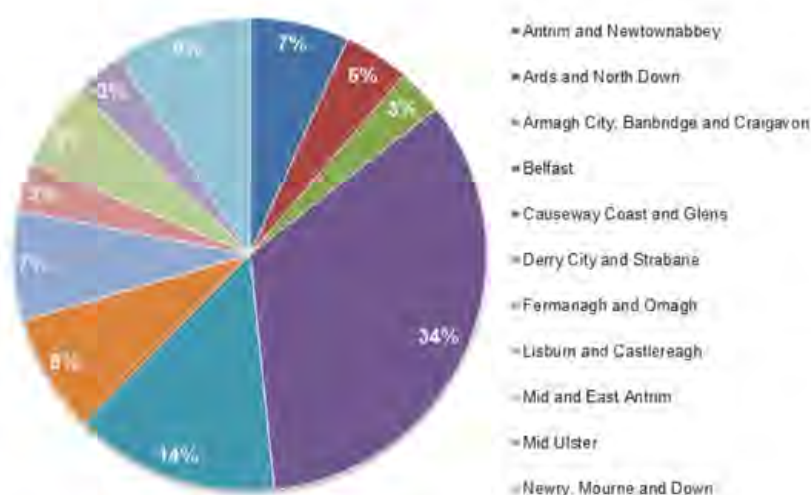
*Figure 7: Origins of visitors to Newry, Mourne and Down, 2013-2015*



Source: NITB

5.11 The availability of commercial accommodation is an indicator of the supply side of tourism. Figure 8 below shows that Belfast accounted for the highest share of accommodation rooms with 34% of the rooms stock in Northern Ireland. Causeway Coast and Glens accounted for the second highest room stock (14%) with Newry, Mourne and Down third (9%).

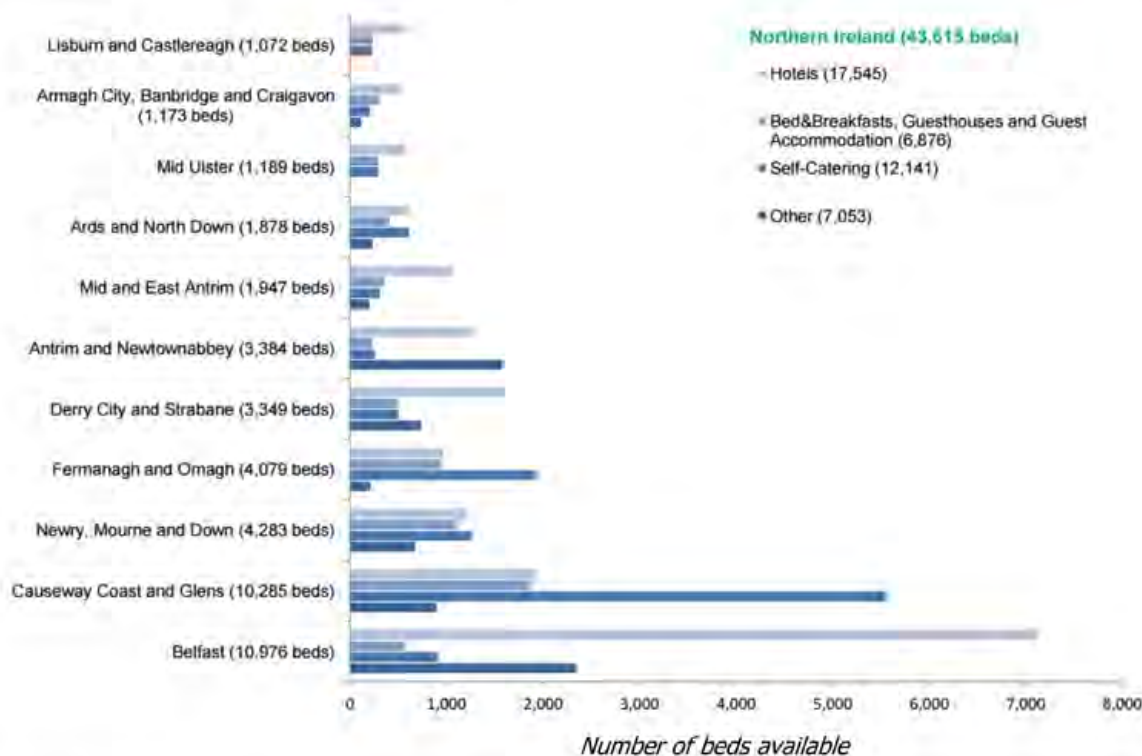
*Figure 8: Room Stock within Local Government Districts, 2015*



*Source: Local Government District Tourism Statistics 2015, NIRSA*

5.12 Figure 9 (overleaf) shows the number of beds available in licensed accommodation by type for the LDGs. It shows that the District has the second highest number of beds available in Bed and Breakfasts, Guesthouses and Guest Accommodation of all Government Districts. Using the figures in the graph below shows that the District accounts for 9.8% of the total number of beds available in licensed accommodation in NI in 2015.

*Figure 9: Number of Beds available in Licensed Accommodation by Accommodation Type and Local Government District, 2015*



Source: Local Government District Tourism Statistics 2015, NISRA

- 5.13 Accommodation occupancy rates are an indicator of the demand for accommodation in the District. The average annual hotel room occupancy rate for the District in 2015 was 55% and in 2014 it was 52% (NISRA). During 2015, the demand for hotel bedrooms in the district was broadly on a par with the Northern Ireland average in the summer season (May to September). However, outside of these months, the demand for bedrooms in the District lags some way behind the benchmark results. There was a significant decline in bedroom demand in the District, such that the average annual occupancy rate was 55% as against 67.3% across Northern Ireland.
- 5.14 Figure 10 (overleaf) shows the breakdown of accommodation stock in the District by type up to the end of 2015.



*Figure 10: Accommodation Stock by type in the District- Year End 2015*

NEWRY, MOURNE AND DOWN DISTRICT COUNCIL	TOTAL	UNITS	ROOMS	BED-SPACES
<b>HOTELS</b>				
5 STAR/4 STAR	3		358	827
3 STAR	2		37	87
2 STAR	1		18	49
1 STAR	1		16	33
UNCLASSIFIED	5		100	231
<b>TOTAL</b>	<b>12</b>		<b>529</b>	<b>1,227</b>
<b>GUESTHOUSES</b>	16		147	349
<b>BED &amp; BREAKFASTS</b>	81		246	534
<b>SELF-CATERING</b>	173	254	625	1,267
<b>HOSTELS</b>	10		177	645
<b>GUEST ACCOMMODATION</b>	17		92	227
<b>BUNKHOUSE</b>	2		7	34
<b>TOTAL</b>	<b>311</b>		<b>1,823</b>	<b>4,283</b>

Source: NITB

5.15 The Council commissioned an Accommodation Needs Analysis Study (September 2015) in which consultations were carried out across the District with current accommodation service providers, attractions, Council senior management, DETI, Tourism NI, Tourism Ireland and selected Tour operators, along with an assessment of current visitor trends. The following accommodation recommendations were made based on the findings on this report:

- More licensed guest inns required
- Mid-market hotel – Downpatrick with Spa
- Killeavy Castle, Hotel and wellness Centre – Ring of Gullion
- Multi-choice accommodation options (i.e. in forest parks)
- Budget hotel in Newcastle or upmarket hostel
- Possible budget hotel in Newry

5.16 The accommodation needs analysis and the recommendations are important to identify where gaps exist in terms of accommodation provision and to assist, where possible, in order to provide the right conditions for people to set up businesses in terms of planning, locations, job creation, rates, and incentives to encourage people to invest in the area.

## 6.0 Newry, Mourne and Down Tourism Assets

6.1 The potential to attract tourism and to sustain interest and investment has been historically based on a mixture of both private and public interests and investments. Natural and built heritage resources are often deemed to be the key players in the ability to generate and attract tourism and revenue; however the ability to attract visitors through cultural tourism such as the hosting of events and activities also plays an important role. This section of the paper will provide an overview of the districts tourism assets and growth areas.

### -Activity Tourism

6.2 Activity Tourism was identified by the NI Tourism Strategy as a key target market. It is estimated to be worth £90-100million per annum in revenue for NI tourist businesses (Source: Activities Tourism-Sharing Success, NITB 2011). It covers a range from active holidays involving canoeing, climbing, horse riding and mountaineering, to the less physical, yet still activity-focused areas of nature walking, food trails, or local culture and heritage trails. DETI and Tourism NI identify Activity and Special interest breaks as a key target market worthy of support in NI. Activities include golf, angling, walking and cycling amongst others. A number of these activities will be further investigated below. First it is important to note that the country parks, parks and forests in the district have an important role to play in the provision of activities and as an attraction for visitors. NISRA (2015) showed that country parks, parks and forests accounted for 43% of all visitors in NI 2015. Delamont Country Park which features an adventure playground, walking trails, boat trips, a shop, bbq area and visitor centre had 212,000 visits in the same period meaning it was one of the top 10 visitor attractions in this category in NI. (Additional information on this and other parks and forests in the district is included in appendix 1).

### -Golf

6.3 The Tourism Strategy for Northern Ireland 2020 highlights the opportunity for growing golf tourism nationally and internationally to position NI as a premier golf destination. There are currently eleven Golf Courses in the District; Ardglass, Downpatrick, Kilkeel, Warrenpoint, Royal County Down, Cloverhill, Mayobridge, Bright Castle, Crossgar, Spa and Ashfield.

6.4 Tourism NI developed a golf tourism strategic plan in March 2015 focusing on the success of golfing in Northern Ireland which aims to maximise the potential of Golf Tourism in NI by 2020. Golf tourism currently generates £33m a year for the economy, but the Tourism NI Golf Strategy aims to boost that figure by at least £17m.

6.5 The Dubai Duty Free (DDF) Irish Open, hosted by the Rory Foundation, returned to Royal County Down, Newcastle in May 2015 for the first time in 76 years. This is a prime example that demonstrated that Newry, Mourne and Down Council, in partnership with others, have the capacity to host major events within the District.

- 6.6 The Irish Open in Newcastle had an audience of over 100,000 and was seen by an estimated 400 million people around the world. It generated over £11 million into the local economy, particularly into the hospitality sector. By providing a visitor experience, which included accommodation, food and drink, culture, a quality natural environment and local hospitality, the District experienced increased visitor numbers as a result of hosting this professional golfing tournament.

*-Angling*

- 6.7 Angling represents a key product to deliver growth and competitiveness for tourism in Northern Ireland and the District. Angling is the 6<sup>th</sup> biggest sport in the UK according to the "A Strategic Review of Angling in Northern Ireland, 2013" commissioned by DCAL. Although angling does not have the visibility of many other activities, such as walking and cycling, based on the number of licences issued, the number of visiting anglers from outside NI appears to be slowly increasing. Evidence shows that the visiting angler is as valuable to the NI economy as a visiting golfer, walker, cyclist or horse-rider and all these groups spend more than the average 'non sporting' visitor.
- 6.8 The District has some of the country's best waters for angling which places it in a prime position to avail of the tourism opportunities that angling can bring. The main beneficiaries of increased angling tourism in the District would be service providers including pubs; restaurants; hotels; holiday lets; and B&Bs. With some notable exceptions there is a lack of awareness among these providers of the potential opportunities to service visiting anglers which would attract new summer business and also extend their season.
- 6.9 Fishing communities in Kilkeel and Ardglass received a major boost in October 2015 through a Maritime Heritage Tourism initiative with the project providing benefits such as Heritage guide training, signage, seating, information panels, free Wi-Fi and media Apps. The aim of the project was to attract and retain visitors who will bring revenue into the ports and their wider communities.

*-Hiking and Walking*

- 6.10 The district offers numerous locations and opportunities for hiking and walking while enjoying the distinctive landscape. The most well-known location within the district is likely to be the Mourne which contains 12 peaks and includes Slieve Donard, NI's highest mountain. The area is partly owned by the National Trust and sees a large number of visitors every year for hiking, cycling and rock climbing. Walk NI identifies the Mourne Mountains as one of six top walking destinations in NI. (Strangford Lough is also identified making the District particularly popular for this activity).
- 6.11 The Mourne tourism profile is made up mostly of day visitors and visitors from within NI with 61 % of visitors being families while 21% are couples and 30% of all those visiting participates in hiking/ walking.



- 6.12 The Destination Mourne Mountains Tourism Management Plan 2013-2018 aims to achieve the vision of the Mournes as 'The Outdoor Playground for the North of Ireland'.
- 6.13 Tollymore Forest Park is an example of how parks are important in the provision of activities. There are four official walking trails within the forest. All trails start and end in the car park. They offer a range of distances and difficulties from the Arboretum Path which is half a mile long to the Mountain and Drinns Trail which can be combined to a total of 8.5miles. The Ulster Way also passes through the forest.
- 6.14 An example of a tourism project in the District is Bunkers Hill, Castlewellan. Bunkers Hill is a small, recently felled forest at the edge of Castlewellan Town. In November 2014 a new 2km multi-use trails and play trail was officially opened at Bunkers Hill Forest. The project was developed by Outdoor Recreation NI on behalf of Down District Council. The new trail is designed for use by the local community and visitors from further afield, and takes in the most glorious views of Dundrum Bay, Slieve Croob and the Mourne Mountains.

*- Mountain biking*

- 6.15 Mountain biking and cycling generally is experiencing a surge in popularity. There are now approximately 100km of official purpose built mountain bike trails across Northern Ireland with an estimated visitor usage of some 100,000 people a year. (Source: "Mountain Biking Guide" as produced by NITB in January 2013).
- 6.16 Two of Northern Irelands three National Mountain Bike Trails are located in the District; Rostrevor Mountain Trails which offer a 27km red trail and 19km black loop, both packed full of technical trail features and panoramic views of mountains and coast; and the Castlewellan Mountain Trails which offer 9km red trail and a 4km green trail, 4.5km blue and purpose-built pump track making it the ideal destination for all ages and mountain biking abilities. There is also a Regional Trail located in Castle Ward as well as a local facility based in Tollymore.

*-Watersports*

- 6.17 With over 100 miles of coastline the District is home to Strangford Lough, Carlingford Lough and a number of beaches that offer water-based activity opportunities. Strangford Lough is the largest sea lough in the British Isles, covering an area from Angus Rock to the sand flats at its northern end, some 20miles (33km) away. It is one of only three Marine Nature Reserves in the UK and is a popular tourist destination offering activities such as leisure sailing, kayaking, fishing, bird watching and diving. It is one of nine canoe trails in NI (Source: Canoe NI) and covers 80 nautical miles taking in the beautiful surroundings, heritage and wildlife. The District also benefits from the South East Coast Canoe Trail.

- 6.18 Beaches are popular tourist attractions as they offer family friendly activity. Beaches in the District include Murlough, Cranfield, Tyrella, Warrenpoint and Newcastle. (Additional information on these beaches is included in Appendix 3). Murlough is the most visited beach in the District with 241,000 visitors in 2014 making it one of the top 10 tourist destinations in NI (excluding country parks, parks and forests, NISRA 2014). The blue flag beach is 5 miles in length and is a key attraction that is popular for swimming, sunbathing and other forms of recreation. The beach is backed by ancient sand dunes that are designated as a National Nature Reserve.
- 6.19 There are a number of other water-based activities that are available at the other beaches for example kayaking, banana boating, jet skiing, pier jumping and canoeing.
- 6.20 The inland rivers and lakes also provide opportunities for water based activities such as wet bouldering, open canoeing, kayaking and canyoning.
- 6.21 Access to Strangford Lough, Carlingford Lough and a number of beaches in the District is limited and as a result prevents the potential for activities such as boating and yachting from being fully realised.

#### *-Activity Centres*

- 6.22 There are numerous facilities within the District offering a wide selection of activities in the Mourne and Ring of Gullion area. These range from climbing, coastering and bouldering, high ropes and zip lines to mountain biking, 4 x 4 off road driving, zorbing, paintballing orienteering and archery. These facilities offer activities to youth/ sports groups, hen/ stag groups and corporate team building. (A list of popular facilities can be found in Appendix 4).
- 6.23 The District has plenty on offer to suit children and families. With many activities throughout the District, suitable for all age groups, such as canoeing, climbing or kayaking there are also centres that cater for children and families. (Additional information on some of the facilities available is in Appendix 5).

#### **-Cultural tourism**

- 6.24 Cultural tourism has been described by the Organisation for Economic Co-operation and Development as 'one of the largest and fastest growing global tourism market... [it is] increasingly being used to promote destinations and enhance their competitiveness and attractiveness'. Cultural tourism is said to include movements of people 'to specific cultural attractions such as heritage sites, artistic and cultural manifestations, arts and drama outside their normal place of residence (Richards, 1996). Some examples of the districts cultural tourism assets are noted below.

*-built heritage*

- 6.25 Built heritage refers to Listed Buildings, Monuments, Parklands, Gardens, Demesnes, Conservation Areas and Local Landscape Policy Areas. The district has an abundance of built heritage assets which are a strong attraction for outside visitors to come to the area. There are a total of 2016 archaeological sites and monuments, 643 listed buildings, 35 historic parks, gardens and demesne, 924 industrial heritage sites, 33 Areas of Significant Archaeological Interest/ Areas of Archaeological Potential, 10 Conservation Areas, 27 Areas of Townscape Character and 216 LLPAs in the district.
- 6.26 Examples include the National Trust estate of Castle Ward House and Demesne which is located on the Shore of Strangford Lough. It includes an eccentric 18<sup>th</sup> Century mansion and estate with 820 acres of landscaped gardens, a fortified tower, Victorian laundry, theatre, restaurant, shop, saw mill and a working corn mill. The estate was the No. 1 destination in the District in 2015 (NISRA, 2015) which demonstrates the importance and draw of built heritage assets in generating visits.

*-natural heritage*

- 6.27 The District enjoys a wealth of natural assets, many of which have special designations afforded to them to protect their distinctiveness and quality. As previously noted the Mourne Mountains and the Strangford Lough (St Patrick Trail) were identified as two of the nine key destinations within the Draft Tourism Strategy for NI to 2020. The Mourne Mountains, Strangford Lough and the Ring of Gullion were also identified as Strategic Natural Resources in the RDS 2035.
- 6.28 In addition to these there are a number of sites that are significant in terms of their natural heritage value and as a result have various designations in order to protect their distinctive character. These designations are noted in more detail in the Environmental Assets preparatory Environmental Assets paper. In brief they include 3 Special Protection Areas (SPAs), 11 Special Areas of Conservation (SACs), 4 Ramsar Sites, 62 Areas of Special Scientific Interest (ASSIs), 2 National Nature Reserves, 5 Nature Reserves, 1 Marine Conservation Zones (MCZs) (Strangford Lough), 1 proposed MCZ (Carlingford Lough) and 3 Areas of Outstanding Natural Beauty (AONBs).
- 6.29 The ability of natural heritage to attract visitors is evident in the number of visits to some of the Districts assets. For example Murlough National Reserve which is a fragile 6000 year old sand dune system at the edge of Dundrum Bay and the Mourne Mountains was the No. 1 attraction in the District in 2014 (NISRA). It consists of a network of paths and boardwalks through the dunes, woodland and heath. It is an excellent area for walking and bird watching due to its spectacular location.



*-Christian Heritage*

- 6.30 The District enjoys an unrivalled link to St Patrick and Christian heritage which offer significant tourism potential. The St Patricks Trail is a 92 mile signed tourist driving trail that connects the key sites with strong links to St Patrick's life, landscape and legacy. It is an excellent way of telling the story of St Patrick's journey and is identified as one of five signature destinations identified by Tourism NI as offering the best opportunities for tourism growth and to create world class excellence for Northern Ireland. The attractions along the Saint Patrick's Trail for the District area include;
- 6.31 St. Patrick's Centre is a permanent interpretative exhibition centre featuring interactive displays on the life and story of Saint Patrick, the patron saint of Ireland. It provides the only permanent exhibition centre in the world devoted to Saint Patrick. In the exhibition, entitled *Ego Patricius*, Saint Patrick's own words are used to illuminate the arrival of Christianity in Ireland and its development through his mission. It also reveals the artwork and metalwork which were features of the Early Christian period, as well as the major impact of Irish missionaries in this period in Europe. The St Patrick centre acts as a hub for tourism in the area, and a focal point for a wide range of educational, religious and cultural interest.
- 6.32 Down Cathedral is a Church of Ireland cathedral located beside the St Patrick Centre. It stands on the site of a Benedictine Monastery, built in 1183. St Patrick's remains are buried in the graveyard. The Cathedral hosts major festivals and services for the Diocese, the highlight being the annual St Patrick's Day celebrations on 17th March.
- 6.33 Down County Museum is located in the restored eighteenth century County Gaol of Down. The museum collects, conserves and interprets those objects which best illustrate the history, culture and environment of County Down. Every year the museum also organises, a range of special exhibitions on a variety of topics. The museum also has an extensive education programme with activities for school and community groups.
- 6.34 Inch Abbey and Quoile Pondage. Inch Abbey is a large, ruined monastic site situated on the edge of the Quoile River with the buildings mainly dating back to the 12<sup>th</sup> and 13<sup>th</sup> centuries. Quoile Pondage, where the river joins Strangford Lough, is a freshwater nature reserve with a visitor centre next to the ruined Quoile Castle.
- 6.35 Struell Wells is a remarkable complex of holy wells, set in a secluded rocky valley along the line of a flowing stream. Though known as St Patrick's Wells, the association is traditional rather than historical, arising from their nearness to Saul, 1.5 miles away. The waters were believed to have curative powers and the site has a ruined church, 2 bath-houses (one for men, one for women) and two roofed wells, all fed by the stream.

- 6.36 Saul Church is a restoration building on the site to commemorate the 1500th anniversary of the landing of St Patrick and was opened on All Saint's Day 1933. Throughout the year visitors and pilgrims, intrigued by the history and beauty of this locality are welcomed. The high point each year is the celebration of St Patrick's Day on 17th March when the Church welcome visitors of all Christian backgrounds to worship.
- 6.37 Bagenal's Castle is a sixteenth century fortified house and adjoining nineteenth century warehouse located in Newry. The legacy of Patrick's work can be found in Bagenal's Castle. It was at this site, in 1157, that the Cistercian abbey was founded. Little remains of the abbey today, but excavations have revealed human remains, pottery and a 12th century slab of granite bearing a Celtic cross. In 2015 Bagenal's Castle were awarded a Silver Award in the Green Tourism Business Scheme.

*-Festivals and Events*

- 6.38 Festivals and events are very useful tools to help drive tourism, extend the tourism season and enhance the District's profile; they are also good at facilitating networking and links with global brands. The showcasing of events, such as home-grown festivals, to major international events such as the Irish Open 2015 is a major driving force at attracting visitor numbers to an area. In terms of the impact of the economy, there is a direct correlation between the ability to attract visitor numbers to the generation of increased spend. In terms of lasting legacies and social impact, such forms of tourism also provide platforms for the visitor to interact with the local culture, local people and explore our scenic landscapes and settlements.
- 6.39 The district delivered an extensive programme of events last year (2016) with highlights including the staging of the Skiffie World Rowing championships on Strangford Lough, the annual Festival of Flight in Newcastle and a new 'Wake the Giant' event in Warrenpoint based on a myth of a sleeping giant reposing on the Cooley Mountains.
- 6.40 The season of 'Giant Adventures' also played host to a number of other music and cultural gatherings across the district including the Mourne International Walking Festival, Fiddlers Green International Music Festival, Blues on the Bay, Soma Arts and Cultural Festival, Lur Cinn Fleadh, Rostrevor Choral Festival, Ballynahinch Game and Harvest Festival, Hans Sloane Chocolate Festival and Hallowtides. (Additional information on some of the festivals and events held is included in Appendix 6).

*-Food Tourism*

- 6.41 Food is a vital part of the tourism experience for visitors coming to Northern Ireland. In 2008, the Northern Ireland Passenger Survey indicated that more was spent on food and drink than on any other category, including accommodation with 33% of the £540 million spent by overseas and domestic tourists being spent on food and drink. Actions have already been taken to boost food tourism with the launching of the Mournes Food Cycle Trail, the Strangford Lough and Lecale Partnership' Seafood Report and the work of the Mourne Seafood Cookery School.
- 6.42 Tourism NI has sought to benefit from the growth of this category by designating 2016 as the NI Year of Food and Drink. As part of this campaign the District showcased its fantastic range of local food and drink through its own 'Taste Junction' Initiative.

*-Screen*

- 6.43 According to statistics published by DCAL in 'Experience of the arts by adults in Northern Ireland 2013/14', the most popularly attended art form in NI was to a film at a cinema or other venue (58% of respondents).
- 6.44 There are two multi-screen cinemas in the District, namely at Downpatrick and Newry. There is also a voluntary run non-profit led cinema based in Newcastle that screens lesser known films and older movies.
- 6.45 The District has also provided a number of filming locations for the Game of Thrones (one of the most popular and successful fantasy TV series ever made) including Leitrim Lodge, Tollymore Forest, Inch Abbey, Quoile River, Castle Ward and Audrey's Field. Guided and self-guided tours now operate and act as a draw to these and to other filming sites throughout NI.

*-Theatre*

- 6.46 Theatre is Northern Ireland's most popular art form, accounting for 60% of all ticket sales from 6,661 art form performances in NI in 2010-2011. The Arts Council of NI annual contribution to the entire arts sector is approximately £13 million a year. Theatre, as one part of that sector, annually accounts for ticket sales revenue in excess of £10 million.
- 6.47 The District has several hubs for theatre activity which include;
- The Down Arts Centre and Down County Museum;
  - Sean Hollywood Arts Centre;
  - Newry Town Hall;
  - Warrenpoint Town Hall; and
  - Newry & Mourne Museum.



- 6.48 These venues are host to various arts, drama, music, theatre and dance programmes and performances as well as being a centre for arts and craft workshops. Unlike other sectors of the Creative Industries, Professional Theatre and Performing Arts, make a further economic contribution to night-time economies.

*-Literature*

- 6.49 Literature was identified as one of seven sectors of significance by Tourism NI. C.S Lewis is possibly the most well know author to have connections to the District. He is believed to have found the inspiration for his Narnia depicted in 'The Lion, the Witch and the Wardrobe' from the Mourne Mountains. He is also reported to have said 'that part of Rostrevor which overlooks Carlingford Lough is my idea of Narnia' (source: Discover NI). This connection is built upon with the Narnia Trail through Kilbroney Forest Park in Rostrevor where the story of Narnia is brought to life in a short family loop trail. The trail is entered like the magical world itself, through a Wardrobe, and leads to several interpretative stations with themes including The Tree People, The Beavers' House, the Citadels and many more.

*-Pubs and Nightclubs*

- 6.50 The night time economy of the Districts larger towns are largely fuelled by the popularity of pubs and nightclubs in the region. The Purple Flag project was initiated in Northern Ireland by Pubs of Ulster and the Association of Town Centre Management with funding support through NITB's Tourism Innovation Fund. Purple Flag is a new accreditation scheme that recognises excellence in the management of town and city centres at night. Purple flag status is similar to Blue Flag for beaches. Purple flag towns and cities must be welcoming to everyone, offer safe ways for visitors to travel home, provide a good mix of venues and be appealing in the evenings.
- 6.51 Newry was granted Purple Flag status in December 2013 and joined the four other Northern Ireland towns and cities of Belfast, Enniskillen, Bangor and Derry-Londonderry. Newry was particularly recommended for their approach to planning and policy, as it has implemented a shared data based planning tool which allows all of the different partners in the community, including local businesses and the Council, to feed into the planning tool and identify opportunities for collaboration. The centre was also commended for having an excellent dining offer, late night venues, high levels of co-ordination between partners and clear leadership.

*-Visitor Information Centres*

- 6.52 Visitor Information Centres (VIC) provide access to a wealth of detailed, up-to-the-minute information, as well as numerous useful services such as accommodation and tour bookings. All the offices perform to national and regional standards and offer free help and advice from trained tourism experts. There are a number of important VIC's found in the District:

- Newry VIC is situated in Bagenal's Castle, a 16th century house and adjoining 19th Century warehouse sympathetically restored to house the Museum and the VIC.
- Downpatrick VIC is situated in the St Patrick Centre, Market Street. In addition to providing visitor information the centre is also a local distributor of DAERA Fishing Licence & Permits.
- Newcastle VIC is located on Central Promenade in the centre of the town.
- Kilkeel VIC is located in the Nautilus Centre which also houses the Mourne Maritime Visitor Centre, Tracing your Mourne Roots Exhibition and the Mourne Seafood Cookery School.

## 7.0 Key Findings and Conclusions

7.1 Below is a summary of the key findings that will be used to inform the Local Development Plan.

The District:

- benefits from a wealth of built, natural and cultural heritage assets including an unrivalled link to St Patrick which are strong incentives in attracting visitors.
- is a popular destination but primarily with domestic visitors from NI who visit the area for holiday/ pleasure/ leisure purposes.
- experiences a high number of visits however, a lower than average number of nights are spent per stay and the lowest average spend per trip of all LGDs.
- ranked second of all LGD in terms of the number of jobs in tourism characteristic industries in 2013.
- is recognised for its adventure and outdoor based recreation and its world renowned golf courses and further potential for growth exists particularly as this is a highly seasonal market.
- has the potential to grow boating and yachting opportunities that are currently limited by poor access to waterways and coastline.
- is strategically located between Belfast and Dublin and has port access at Warrenpoint which has further potential to attract the cruise market.
- accounts for 9.8% of available beds in licensed accommodations in NI and although it experiences lower than the NI average occupancy research has indicated that there is a need for additional accommodation in the District including a hotel in Downpatrick to enable visitors to stay and explore the Town and surrounding area.

7.2 These key findings will be used to inform the preparation of the LDP. The LDP will also take account of the Council's Community Plan and Tourism Strategy that are currently in draft form.

7.3 As previously noted the LDP, in line with the SPPS, will contain policies to safeguard tourist assets, together with policies for tourism development such as tourism accommodation, amenity facilities, and holiday parks, and the criteria for

consideration of such proposals. It can also give consideration to identifying potential growth areas.

7.4 In accordance with the RDS 2035 the LDP will promote a sustainable approach to the provision of tourism infrastructure to conserve, protect, and where possible enhance the District's natural environment and built heritage.

7.5 There are many benefits to be gained from adopting a more sustainable approach to tourism:

#### Environmental Benefits:

- Safeguarding the resource for the benefit of future generations, and
- The protection and enhancement of the special landscapes and features that together form much of Northern Ireland's appeal to visitors.

#### Community Benefits:

- Real opportunities for community involvement in tourism and the creation of a better climate for development.
- Supporting the local economy and local services – for example, helping to support local transport systems in rural areas.
- Creating new business opportunities.

#### Benefits to the Tourism Industry:

- Enhanced appeal of Northern Ireland for visitors from those market areas which have a high proportion of discerning and ecologically aware consumers, for example North European countries.
- Opportunities for the development and promotion of environment friendly activity tourism such as cycling, walking, birdwatching, many water based activities, and newer interests including conservation holidays.

#### Benefits to the Visitor:

- The development of a quality tourist service;
- Better relationships with the local community, and
- Closer involvement with, and better understanding of, both the people and the holiday destination.

(Source: NITB - A Sustainable Approach)

7.6 Proper management and conservation of the resources of the District in a sustainable way is vital if future generations are not to be denied the opportunity to use and enjoy them. This is of particular relevance in the context of sensitive landscapes such as the Ring of Gullion and other locations, which are being threatened by a combination of visitor pressure and an associated demand for



development. The District contains some of Northern Ireland's most dramatic scenery, and has a rich natural and man-made heritage. If the potential of these resources is tapped successfully, there could be a substantial spin-off to other sectors of the local economy.

## **Appendix 1: National Trust Assets**

### **Rowallane Garden**

- A1.1 Rowallane Garden is located immediately south of Saintfield, County Down. The gardens are a mix of formal and informal spaces with many unusual vistas and unique plants from across the world. The Garden, of some 50 acres in total, features a walled garden, a natural Rock Garden Wood, wildflower meadows, a Farmland Walk (taking in the summit of Trio Hill) and a Woodland Walk, as well as a tea-room in the old farm stables, which features a bell-tower. The estate house is the headquarters of the National Trust in Northern Ireland.

### **Castle Ward**

- A1.2 Castle Ward is an eccentric 18th-century mansion and estate looking out over the tranquil waters of Strangford Lough. Castle Ward is open to the public and includes 332 hectares (820 acres) of landscaped gardens, a fortified tower house, Victorian laundry, theatre, restaurant, shop, camping pods, saw mill and a working corn mill. It has a shore on Strangford Lough. Castle Ward was the Winner of Highly Commended Best Visitor Experience, NI Tourism Awards 2014. Events held at Castle Ward include: Pumpkinfest, International Bread Festival, Santa's Grotto and many various Craft Fairs.
- A1.3 Castle Wards sprawling medieval walls and castle gate entrance together with stunning surrounding landscapes have attracted many Hollywood film production companies to film onsite, namely; Game of Thrones TV show, Dracula Untold movie and Frankenstein Chronicles TV show.

### **Strangford Lough**

- A1.4 The largest sea lough in the British Isles, covering an area from Angus Rock at its mouth on the Irish Sea, to the vast sand-flats at its northern end 20 miles (33 kilometres) away. It is one of only three designated Marine Nature Reserves in the United Kingdom. Strangford Lough is a popular tourist destination noted for its fishing and scenery. Strangford Lough is used for activities of leisure - sailing, kayaking, bird watching and diving. There are canoe trails in place and a 'Strangford Lough Activity Map' has been launched as a part of a series of maps produced by the Ordnance Survey of Northern Ireland.

### **Murlough National Nature Reserve**

- A1.5 Murlough National Nature Reserve is a fragile 6000 year old sand dune system located at the edge of Dundrum Bay and the Mourne Mountains. It consists of a network of paths and boardwalks through the dunes, woodland and heath. It is an excellent area for walking and bird watching due to its spectacular. In 2014, Murlough attracted 241,000 visitors making it the No. 1 visitor attraction in the Newry, Mourne and Down Council area. There are two car parks at Murlough, one public with no facilities and the other owned by the National Trust. The National Trust car park includes a toilet block and café. Although a very popular destination,

the National Trust's priority for the site is conservation and consequently there are no plans to increase the site's facilities. The existing facilities provide a welcome destination and point of interest for walkers.

### **The Mournes**

- A1.6 The Mourne mountains contain twelve peaks and include Slieve Donard, Northern Ireland's highest mountain. The area is partly owned by the National Trust and sees a large number of visitors every year. The Mournes are visited by many tourists, hill walkers, cyclists and rock climbers. The Mournes are also one of the nine designated destinations within Northern Ireland.

### **Derrymore House**

- A1.7 Derrymore House is an 18th-century thatched cottage and estate located in Bessbrook. Derrymore is surrounded by unique parkland of magnificent oaks and is full of history, beauty and enchantment. Part of the Ring of Gullion waymarked trail, there are a number of walks to enjoy and breath-taking vistas of the Newry Viaduct and the Mourne Mountains.



## **Appendix 2: Country Parks, Parks and Forests**

### **Slieve Gullion Forest Park, Adventure Playpark and The Giant's Lair**

- A2.1 Slieve Gullion Forest Park covers an area of 2500 acres. The Forest Park offers walking trails, a scenic drive, an Adventure Play park, Giant's Lair children's story trail and Courtyard with coffee shop. The area has some of the best biodiversity in the region and has a multitude of protected areas and visitors have the chance to see wildlife on the Red Squirrel Safari.
- A2.2 The Slieve Gullion Forest Adventure Park provides award winning play facilities for children and young people and has also attained the 'Green Apple Environment Award' and 'NITB Best Tourism Partner Initiative Award'.

Also located within the forest park is The Giant's Lair. The Giant's Lair is an innovative magical living storybook. The Trail takes visitors on a journey of intertwined fairy house and arts features creating a fantastical childhood land of mystery, dragons, giants, witches and fairies. The art in the Giant's Lair is all inspired by the rich tapestry of local legend and mythical folklore on over a mile of woodlands within the Forest Park.

### **Kilbroney Park**

- A2.3 Kilbroney Park is 92 acres in area and offers a wide range of facilities and services, which includes tennis courts, children's play area, playing fields, an arboretum, barbeque and picnic areas and cafe and a well serviced caravan and camping site. There are three waymarked trails, which vary in length from two kilometres to seven kilometres, and take the visitor to various areas within the forest to enjoy the many magnificent views and beauty of the woodlands.
- A2.4 These trails in Kilbroney Park bring to life the story of Narnia and other stories, myths and legends associated with this special area of the Mourne. The Narnia legends are interpreted along a short family loop trail, entered like the magical world itself, through a Wardrobe, and leading the visitor to several interpretative stations with themes including, The Tree People, The Beavers' House, The Citadels and many more. A more challenging walk has been created to the legendary Cloughmore Stone, linking another important legend - that of the Giant Fionn McCumhail - to the Narnia theme.
- A2.5 The Council produced a draft Masterplan (August 2015) for the park which identifies proposals for the development of Kilbroney Park and Rostrevor Forest. The Masterplan draws focus on projects which have a spatial dimension and sets out how different areas of Kilbroney Park and Rostrevor Forest will work together to provide an enhanced resource for local people and a compelling experience for visitors.

### **Donard Forest Park**

- A2.6 There are currently no facilities for recreational activities provided in Donard Forest but the public are welcome to visit this forest on foot. Donard Forest was planted in 1927 and consists of scots and corsican pine, with herbaceous plants and woody shrubs hidden below the tree canopy. This area is the habitat for the Holly Blue butterfly and a wide range of bird species. The Glen River Bridge provides a picturesque viewpoint for the many cascades and waterfalls. Nearby are some ornamental trees including monkey puzzle and giant red wood.

### **Tollymore Forest Park**

- A2.7 Tollymore Forest Park was the first state forest park in Northern Ireland, established on 2 June 1955. Tollymore Forest Park caters for many outdoor activities including walking, caravanning/camping, horse riding and orienteering and the park has designated areas for camping and caravans.
- A2.8 There are four official walking trails within the forest each marked with different coloured sign posts. All the trails start and end in the main car park. The blue trail (Arboretum Path) is half a mile long and passes through the arboretum. The red trail (River Trail) is three miles long and follows the Shimna River up one side as far as Parnell's bridge and then back along the other side. The black trail (Mountain Trail) is five and half miles long and the black trail 1 (The Drinns Trail) adds another three miles to the black trail by passing behind The Drinns (two forested hills) and following the boundary wall. The Ulster Way also passes through the forest.
- A2.9 In March 2015 Tollymore opened a new Nature Play Space for the kids called the 'Big Deer' which is designed for four to eleven year olds. It consists of an impressive wooden play space featuring a giant timber Fallow Deer, castle turret, folly tower and hollow tree all connected through a series of rope-bridges, tunnels, spider webs, basket swings and slides. There are also picnic facilities available.

### **Castlewellan Forest Park**

- A2.10 Castlewellan Forest Park caters for many outdoor activities including walking, caravanning and camping, horse riding, orienteering and many others. The park offers camping and caravanning sites with tarmac and grass pitches for the caravan or camping enthusiast.
- A2.11 One of the Forest Park's key attractions, the Peace Maze, is one of the world's largest permanent hedge mazes, representing the path to a peaceful future for Northern Ireland. Planted in 2000 with community involvement, it is maturing quickly and visitors attempt to solve their way to the peace bell in the centre of the maze.

A2.12 A brand new play structure has recently been installed in the forest park (March 2015). 'Animal Wood' is designed for four to eleven year olds and is located beside the Peace Maze. Featuring a short path, Animal Wood provides lots of opportunities for playing on wild woodland animals including a badger and its den, a red squirrel and a giant spider. In addition it boasts a wooden play structure with a tower in the image of The Moorish Tower where children can enjoy the climbing wall, fireman's pole and rope-bridge over to a hollow tree stump slide and Red Kite nest.

### **Delamont County Park**

A2.13 The Park features an adventure playground, walking trails, boat trips, a shop, bbq area and visitors centre. It also features a miniature Thomas the Tank Engine Railway. There are five waymarked walks: Mullagh Walk 1km; Garden Walk 1.2km; Strangford Walk 2km; Corbally Walk 4km; and Longwalk 7km. It also provides all year round events such as Magnificent Birds of Prey Display, Silly Tilly Magic Show, Model Aircraft Display, Medieval Artisan Food & Craft Market and Crossgar Vintage Tractor Club. Statistical figures show that Delamont was rated within the top 10 for Country Park/Park/Forest/Gardens in Northern Ireland, attracting 221,000 visitors in 2014.

### **Drumkerragh**

A2.14 There are currently no facilities for recreational activities provided at Drumkerragh but the public are welcome to visit this forest on foot. Drumkeeragh Forest is seven miles south west of Ballynahinch on the lower slopes of Slieve Croob. The forest has mixed coniferous trees. From the forest there are extensive views across County Down. An extensive forest road system allows walkers to access most of the forest.

### **Mournes**

A2.15 The Mournes are visited by many tourists, hillwalkers, cyclists and rock climbers. The Destination Mourne Mountains Tourism Management Plan 2013-18 was published by the Destination Forum Group made up of public and private stakeholders including the former Down District Council, Newry and Mourne District Council and Banbridge District Council. It outlines a collective vision and set of actions to grow tourism at a local level within the signature destination and also fulfil national targets set out in the draft 2020 Tourism Strategy.

A2.16 The Mournes tourism profile is made up of mostly day visitors and visitors from within Northern Ireland with 61% of visitors being families while 21% are couples and 30% of all those visiting participate in hiking/walking. The Tourism Plan identifies that the Mourne Mountains' strengths are:



- Walking and Climbing,
- Scenery, beautiful landscape and views,
- Mountain biking and cycling,
- Seaside, beaches and Newcastle,
- The Mourne and other mountains,
- Silent Valley and
- Outdoor recreation and activities.

A2.17 Playing on these strengths, the vision for the Mourne is "The Outdoor Playground for the North of Ireland" and the objective is to "maximise the Mourne potential to attract and encourage visitors to stay longer and spend more".

To achieve this vision, key actions are listed under 4 strategic themes:

1. Investment & Infrastructure,
2. Marketing & Promotion,
3. Distinct Visitor Experiences and
4. Building Business Engagement & Sustainability.

A2.18 Key locations in the Mourne Signature Destination are;

- Newcastle
- Silent Valley and Ben Crom
- Tollymore Forest Park
- Dundrum Castle
- Slieve Croob
- Castlewellan Forest Park
- Slieve Donard Resort & Spa Slieve Donard
- Rostrevor Forest
- Tollymore Mountain Centre
- Dundrum Bay Murlough
- Nature Reserve
- Kilbroney Forest Park

## **Appendix 3: Beaches**

### **Murlough National Nature Reserve**

- A3.1 This 5 mile stretch of golden sands is still a key attraction and is hugely popular for swimming, sunbathing and other forms of recreation. In 2014, there were 241,000 visitors to Murlough, a drop of 33% on the previous year figures. However, as detailed in section 6.18, Murlough is still the current most popular beach in County Down and is also rated in the top 10 tourist destinations within Northern Ireland in the NISRA 2014 statistics.

### **Cranfield Beach**

- A3.2 Cranfield beach is an attractive sandy beach with Blue Flag status. Due to the estimated 4000-5000 caravan users who stay in the area over the summer, the beach, the café and local amenities are well used. On many days in the summer Cranfield struggles to cope with the number of visitors. East Coast Adventure host outdoor activities at Chesnutt Caravan Park every summer at the weekends but this is open to the public as well as people staying in the caravan park. Tourists regularly walk from Cranfield to Greencastle on an informal path but few go north towards Kilkeel.

### **Tyrella Beach**

- A3.3 Tyrella Beach is a small, enclosed beach within Dundrum Bay, Downpatrick, County Down. It is a wide, flat, sandy beach two kilometres long and backed by 25 hectares of mature dunes in a conservation area offering scenic walks and an insight into the habitat of local flora and fauna. Tyrella Beach has been awarded the prestigious Seaside Award annually since 1997 and has also maintained the Blue Flag award in 2011 due to the management and cleanliness of the beach. It has also retained its Green Coast Award since 2008. An ideal destination for locals and visitors alike, the clean waters invite water sport enthusiasts and the beach provides a safe haven for families and groups who wish to picnic in a clean environment. The beach boasts a car free zone, off-beach parking facilities and a lifeguard on duty for safe bathing in the summer months and holidays. There is also a tourist information centre nearby offering advice to visitors on the immediate and surrounding area.

### **Warrenpoint Beach**

- A3.4 Warrenpoint Beach is located alongside the Mourne Mountains on the shores of Carlingford Lough. It is a gently sloping shingle beach with well-developed facilities that include shopping and a promenade popular with all types of walkers. It is host to a range of activities including Kayaking, Banana Boating, Jet Skiing, Pier Jumping and canoeing. It is also home to a large salt water swimming pool, one of the last remaining in Northern Ireland.

- A3.5 A planning application, LAO7/2015/0369/F, was submitted on 29th May 2015 for the proposed refurbishment of the saltwater swimming pool. The proposal includes the restoration of the Edwardian kiosks with a new public event space, units for a café, additional space for water sport activities and modernised changing facilities. No decision has been made on the application but it is currently recommended for approval (correct as of 9th January 2016).

### **Newcastle Beach**

- A3.6 Newcastle Beach is a popular tourist destination located on the South Down coast. Newcastle Beach comprises of sand, pebbles and larger stones and is approximately 2.5 km in length. The major part of Newcastle Beach is backed by a promenade and the seaside town of Newcastle, which has lots of shops, amusements and other attractions. The beach has a very gentle slope with the Mountains of Mourne in the background.



## **Appendix 4: Activity Centres**

### **East Coast Adventure Centre**

- A4.1 East Coast Adventure Centre has a mountain centre nestled just outside the village of Rostrevor, a water sports centres on the shores of Carlingford Lough in Warrenpoint, a Mountain Bike Hire and Uplift service located at the Rostrevor MTB Trails in Kilbroney Forest Park and a Driving Range, Archery and Zip Line Centre located on the grounds of Mourne Park, Kilkeel.

### **Tollymore National Outdoor Centre**

- A4.2 Tollymore National Outdoor Centre is Sport Northern Ireland's National Outdoor Centre. It offers a range of one day and weekend courses in rock climbing skills, learning to lead and multi pitch climbing, Canadian canoeing, kayaking and sea kayaking, mountain biking, orienteering and coasteering. The centre also offers accommodation.

### **Acton Adventures, Poyntzpass**

- A4.3 Acton Adventures was established in 2005 to open the game of paintball to the people of Northern Ireland. However over the past number of years it has expanded and now offers a full range of corporate and team building activities. Action Adventures offer packages for clubs and team, stags and hens, corporate events and group of friends. Catering and accommodation can also be provided.

### **Greenhill Y.M.C.A. National Centre**

- A4.4 Greenhill YMCA is an outdoor education and residential centre set in a 17 acre site on the slopes of Slieve Donard. Greenhill deliver programmes for schools, colleges, youth groups, cross community groups and church groups and have been established for over 100 years. Activities take place either in the extensive grounds on site or the surrounding area: i.e. The Mourne Mountains, Castlewellan Forest Park and Lake and Tollymore Forest Park. Greenhill has been awarded the Adventure Activity Associations 'Adventuremark' which is awarded only to those Activity Centres that have been inspected and proven to have met the necessary standards for the safe delivery of Adventure Activities as defined by the Adventure Activities Industry Advisory Committee. Accommodation can also be provided within this centre.

### **Life Adventure Centre, Castlewellan**

- A4.5 Life Adventure Centre provides activities such as canoeing and Kayaking, Hill Walking and Rock Climbing, Trail and Mountain Biking, Wet Bouldering and Coasteering, Archery and Clay Pigeon Shooting, Raft Building and Team Quests and camping. The Centre is an 'Adventure Mark' accredited provider, members of the

Institute of Outdoor Learning, affiliated to the 'Association of Mountaineering Instructors' and Silver Recipients in the 2015 'Irish Responsible Tourism Awards' for Best Adventure Provider. They have also been awarded Gold in the Green Tourism Awards 2014.

### **26 Extreme, Warrenpoint**

- A4.6 26 Extreme specialise in the planning of some of the largest outdoor events in Ireland including the Causeway Coast Marathon, The Mourne Way Marathon and the Coast to Coast Multisport Race across Ireland.
- A4.7 On 12th June 2016, the Council in association with 26 Extreme, presented a new Mountain Bike event 'In the Red' for the Rostrevor Trails, as part of the Northern Ireland Festival of Cycling 2016.

### **Rock and Ride Outdoors, Kilcoo**

- A4.8 Rock and Ride Outdoors is Ireland's leading outdoor company providing Mountain Biking, Rock Climbing and Mountaineering courses, coaching and qualifications throughout Northern Ireland and beyond. It is located in Kilcoo and is comprised of three of Ireland's most qualified instructors, Rock and Ride Outdoors offers programmes for anyone from total beginners looking to start a new sport to aspiring instructors looking to make their living in the outdoor industry.

### **Flagstaff Adventures, Newry**

- A4.9 Flagstaff Adventures provides the following Outdoor Activities located in the beautiful Ring of Gullion. It is set on a 120 acre site offering activities such as 4 x 4 Off Roading, Clay Pigeon Shooting, Archery and Paintballing. The centre provides these activities for Large Youth / Sports Groups, on a Hen or Stag parties, or Corporate or Team Building activities from work.

### **Clearsky Adventure Centre**

- A4.10 Clearsky Adventure Centre is an outdoor pursuits centre located in the medieval 'Old Castle Ward' area of the Castle Ward Estate on the shoreline of Strangford Lough. A vast range of outdoor activities are on offer at the activity centre for schools, groups, family fun days, businesses & individuals. These activities include; archery, rock climbing, raft building, laser clay pigeon shooting, orienteering, climbing and abseiling, coasteering, Kayaking and safari boat tours are also on offer. The Centre has recently been awarded the 'Adventuremark' Accreditation.

## **Appendix 5: Children and Family**

### **Sheepbridge Family Entertainment Centre, Newry**

- A5.1 Sheepbridge centre has a state of the art children's indoor play area, called Cheeky Monkeys with a 4 tiered climbing frame, ball pools, bumper boats, battery operated go karts and slides. There is also a Space Quest laser tag arena and the centre has the only bowling alley in Newry and the surrounding area with 10 state of the art, glow in the dark lanes and a retro bowling theme.

### **Newcastle Rock Pool**

- A5.2 The Rock Pool in Newcastle has been open for more than 80 years and is the last open-air sea water swimming pool in Ireland. The pool is open for eight weeks during the summer months.

### **Coco's Adventure Playground, Newcastle**

- A5.3 Coco's consists of an adventure playground, sports court, snake slide, Free Fall, tube slides, assault course and toddlers area including bouncy castle. Coco's is open all year round and is popular for hosting kids birthday parties.

### **Funky Monkeys, Downpatrick**

- A5.4 Funky Monkeys combines a fun playground with a yummy "healthy-eating" cafe offering stay and play, birthday parties and weekly educational classes. The centre is specifically for children aged 0-8 years old, and has an arts and crafts area, and a separate toddler area too.

### **Funny Farm Adventures, Castlewellan**

- A5.5 Funny Farm Adventures is a park with a 6 acre themed Maize Maze, which is the only one of its kind in Northern Ireland. Also available, Mini Digger, Football Wall, Rope Maze, Garden Games, Barrel Train, Laser Clay Shooting, Archery etc.

### **Mourne Archery Centre, Castlewellan**

- A5.6 A place where you can learn the sport of archery with the help of trained archery leaders.

### **Seaforde Gardens and Tropical Butterfly House**

- A5.7 The Tropical Butterfly House is set in beautiful grounds, with hundreds of free flying tropical butterflies, also parrots, reptiles and insects. There are avenues of mature trees, a maze set in the middle of an old walled garden and a children's play area.



**Formula Karting: Indoor Grand Prix Kart Racing, Newry**

- A5.8 Formula Karting, Newry is one of the biggest indoor karting track in Europe. It has tracks on 2 Levels available for racing with overpasses, tunnels, underpasses, ramps, bridges and banked corners. Suitable for teen parties, kids parties, youth or school groups, family day out or just an evening out with friends.

## **Appendix 6: Festivals and Events**

### **B/E Aerospace Festival of Flight**

- A6.1 The B/E Aerospace Festival of Flight is one of the major highlights in Northern Ireland's event calendar, attracting many thousands of visitors. The Festival is a full programme of events in Newcastle that take place in August. The airshow is the centre piece of the Festival where the crowds watch as the sky over Dundrum Bay is filled with the roar of engines.

### **St Patrick's Day**

- A6.2 St. Patrick has been identified as a key signature destination by Tourism NI that will give stand out for Northern Ireland in out of state tourism markets. Downpatrick has been identified as a core hub for this project. Downpatrick boasts a seven day programme of events for the St Patrick's Celebrations including the St Patrick's Day Cross-Community Carnival Parade which attracts over 30,000 spectators. With over 50 events to choose from and a wealth of free entertainment on offer, Downpatrick's St Patrick's Celebrations has something for everyone including a range of concerts, exhibitions, sporting and family events. Tourism NI has recently agreed to award 3 years financial assistance in connection to the St. Patricks festival to the District, in partnership with Armagh, Craigavon and Banbridge Borough Council.
- A6.3 St. Patricks Day in Newry also provides family entertainment with live music, street entertainment, street theatre, comedy, and street performances of Irish Dancing.

### **Kingdom of Mourne Festival, Kilkeel**

- A6.4 This is a two-week festival that is held annually mid-July and mid-August. This festival improves local community relations and it is also a major attraction for holidaymakers. Events include sheep dog trials, street hockey, children's fancy dress, sand castle competitions, vintage vehicles, live open air & pub entertainment, tennis coaching, exhibitions and demonstrations, fishing competitions and a fireworks display.

### **Warrenpoint Blues on the Bay Festival**

- A6.5 The Blues on the Bay Festival takes place in Warrenpoint over the last bank holiday weekend in May. It attracts Blues & Jazz performances and includes many acts throughout the weekend in the selected bars. Music workshops also feature throughout the weekend.

### **Walking festivals**

- A6.6 The Mourne International Walking Festival in June and the Wee Binnian Walking Festival in September offer a wide variety of walks ranging from excellent road and track walks to guided mountain rambles and hikes.

### **Fiddler's Green Festival, Rostrevor**

- A6.7 Fiddler's Green Festival is a family-established annual celebration of Irish music and culture with an international flavour, which takes place in the village of Rostrevor. The Festival includes the annual Hall of Fame award, presented to the person or group who has made a significant contribution to Irish music or culture. The nightly folk club features the best of Irish & International Folk performances.

### **Hallowtides**

- A6.8 Hallowtides is a programme of events with both private and public organisations getting behind the successful and popular festival. It runs in both Newcastle and Downpatrick. The programmes include live music and entertainment, fancy dress completions, pumpkin contests and fire work displays.

### **Warrenpoint International "Maiden of the Mourne" Festival**

- A6.9 This is a two-week festival that happens somewhere between mid-July and mid-August. This festival offers something for all the family, with a range of events including band concerts, outdoor entertainment, sporting events & top celebrity performances, parades, children's events and The Maiden of the Mourne Competition featuring entrants from across the world.

### **Felie Chamlocha**

- A6.10 The South Armagh village of Camlough hosts an action packed festival of music, dancing, storytelling, as well as a series of fun events for all including a tug-of-war, waiter races, duck derby, and of course a fancy dress donkey derby. There are also traditional music workshops, children's art workshops, bus trips, and street parties and are lots of sporting events, including soccer & GAA tournaments, lake swims, road bowls, fishing and shooting contests.

### **Annalong Harbour Hooley**

- A6.11 Annalong Harbour Hooley is a weekend festival beginning mid-August. The main event is the Mackerel Massacre (a fishing competition), followed by a raft race, street theatre, vintage car show, talent competition for children and the Solid Gold Show. This event attracts people on a local and national basis.



### **Sticky Fingers Festival 'A celebration of Arts for Early Years'**

A6.12 Sticky Fingers Annual Festival based in Newry runs throughout the month of October and offers a whole month full performances, workshops and music. The Festival is offered to children from 0 to 12 years old and it has become a landmark event.

### **Boley Fair Hilltown**

A6.13 The Boley Fair celebrates rural traditions and aims to bring rural skills and past-times of a bygone era to a wide audience of local people and visitors alike. Over the five-day period, fair goers can participate in a wide variety of events including music, dancing, sports, traditional skills and family events. The annual festival is centred on the Sheep Show that traditionally takes place on the second Tuesday in July.

### **Kilbroney Vintage Show**

A6.14 The Kilbroney Vintage Show has been running since 1985, and is now recognised as the premier event of its kind in Ireland. Over 1,500 old vehicle enthusiasts descend on Kilbroney Park with their vehicles; there is also a funfair and novelty shows for children, including Clowns, Magic Shows and Face Painters. 2015 marked the 30<sup>th</sup> Anniversary of the Kilbroney Vintage Show.

### **Circuit of Ireland**

A6.15 In March 2015, Downpatrick held the launch of the Circuit of Ireland, one of the top five sporting events in Northern Ireland. Large crowds gathered to see off the 140 rally cars in the morning followed by rally competitors arriving in St Patrick Square. There was a full programme of entertainment, including a bouncy castle, face painters, balloon modellers, live music and a climbing wall.

### **Ballynahinch Harvest and Country Living Festival**

A6.16 This event, set up to celebrate the pig, potato and pageantry, which Ballynahinch town was once popular for gives children the chance to get up close and personal with their favourite animals. Visitors are entertained by live music, street performers, and face painting. This year's festival took place on Saturday 19<sup>th</sup> September 2015, and included The Great Ballynahinch Bake Off which saw baking enthusiasts compete for the best apple tart and scones in town.

### **International Clowns Festival, Downpatrick**

A6.17 This event has been held in different locations all over Europe in recent years but this is the first time it has come to Ireland and arrived in Downpatrick for 2015. More than 40 acclaimed clowns descended on the town, entertaining locals and visitors. In addition to the clowns, there were also be pantomimes, jugglers,

magicians, puppeteers, acrobats, bubble artists, stilt walkers, balloon sculptors and face painters.

#### A6.18 **Herring Gutters Festival, Harbour Inn, Newcastle**

This local festival is suitable for all the family and runs for one weekend over the summer months July or August. The entertainment includes, The Big Wheaten Bread Bake-off, craft stalls, car treasure hunt, Irish dancers and live traditional folk music.

<b>Report to:</b>	<b>Planning Committee</b>
<b>Subject:</b>	Newry, Mourne and Down Local Development Plan Preparatory Studies Paper 9: Public Utilities
<b>Date:</b>	2 February 2017
<b>Reporting Officer:</b>	Anthony McKay, Chief Planning Officer
<b>Contact Officer:</b>	Andrew Hay, Principal Planning Officer

### **Decisions Required**

Note the content of this report.

#### **1.0 Purpose & Background**

- 1.1 A programme of preparatory work is being undertaken as part of the Local Development Plan (LDP) process. Preparatory studies are essential in providing the evidence base for preparing the Local Development Plan (LDP). A reliable and comprehensive evidence base is vital to informing and justifying the 'soundness' of the LDP documents (Plan Strategy and Local Policies Plan) and to show how planning policies and proposals help to achieve the social, economic and environmental objectives for the plan area.
- 1.2 The SPR Committee is responsible for the Local Development Plan. All LDP papers are reported to the SPR Committee for noting or decision. All LDP papers will also be presented to the Planning Committee for noting. Depending on the subject matter, a LDP paper will also be presented to any other relevant Council Committee for noting.
- 1.3 'Paper 9: Public Utilities' was reported to the SPR Committee on 19/1/17, and given some of the subject matter, it has also been presented to the RTS Committee on 25/1/17.
- 1.4 The paper provides members with an overview of matters relating to public utilities and implications for land use planning in the Newry, Mourne and Down District Council area. The paper builds on the existing evidence base and provides information on:
  - The regional and local policy context for public utilities and key service providers in the District;
  - An overview of the provision of public utilities in the District; and
  - An outline of the main proposals for public utilities within the District.
- 1.5 Members are asked to note the content of this report. Any comments received will be considered. The paper will be subject to any changes considered necessary in response to any valid comments received at this or any other Committee to which it is presented.

#### **2.0 Key Issues**

- 2.1 'Paper 9: Public Utilities' informs members on the provision and spare capacity of public utilities up to 2030 in order to assist judgements on the allocation of land for development in the Local Development Plan, and to ensure that sufficient land is allocated to meet the anticipated needs of the community. It sets out the regional context for public utilities and an examination of existing physical infrastructure of the District. It examines the role of Government Department and statutory bodies, including the Council, who have a



responsibility for various public utilities and associated service provision in relation to meeting existing needs and in terms of future supply.

- 2.2 The paper allows members to commence consideration of the land use implications of public utility provision and how public utilities can be addressed in the Plan within the context of the Regional Development Strategy (RDS) and the Strategic Planning Policy Statement (SPPS).
- 2.3 The provision of public utilities within the plan area is primarily the responsibility of a number of Government Departments and statutory bodies, and the Council. The paper addresses public utilities under the following themes:
- Telecommunications
  - Energy Supply
  - Waste Management
  - Flood Risk, Drainage, Water Supply and Sewerage.
- 2.4 The paper provides an overview of utility provision within the District and looks at the existing provision and spare capacity of public utilities. Utility provision in the LDP must take account of regional planning framework set out by the RDS and the SPPS.
- 2.5 In accordance with regional and operational policy, the LDP will seek to locate new developments which maximise the efficient use of existing utility infrastructure whilst keeping the environmental impact to a minimum. Where proposals to develop new or replace existing public utilities are known these should be identified in the Plan. Where provision of an existing public utility is limited and there are no known plans to upgrade during the plan period, development may be constrained as a result. In allocating any land for new development, these factors will inform where new development can go.
- 2.6 The paper identifies the key elements within each of the above public utility themes to be considered in the preparation of the LDP.
- 2.7 Data gathered as part of this and other preparatory studies will be used to establish the baseline of the social, economic, and environmental characteristics of the plan area and enable the Council to identify the issues which need to be addressed by the LDP. Furthermore, it will provide a sound basis on which to formulate the plan strategy, policies and proposals within the LDP that will subject to independent public examination.

### 3.0 **Recommendations**

- 3.1 Members are requested to note the content of this report.

### 4.0 **Resource Implications**

- 4.1 N/A

### 5.0 **Appendices**

- Paper 9: Public Utilities



Comhairle Ceantair  
**an Iúir, Mhúrn  
agus an Dúin**

**Newry, Mourne  
and Down**  
District Council

**Local Development Plan  
Preparatory Studies**

**Paper 9: Public Utilities**

**January 2017**

<b>Contents</b>	<b>Page No</b>
Purpose & Content	3
<b>1.0</b> Introduction	4
<b>1.3</b> Main Stakeholders in Public Utility Provision	4
<b>2.0</b> Regional Policy Context	5
<b>2.2</b> The Regional Development Strategy 2035 (RDS)	5
<b>2.14</b> Planning Policy	8
<b>3.0</b> Newry, Mourne & Down Council Plans & Strategy	9
<b>3.1</b> Newry Mourne & Down District Corporate Plan 2015 - 2019	9
<b>3.2</b> Newry, Mourne & Down Community Plan 2030 'Living Well Together'	9
<b>3.7</b> Newry Mourne & Down Economic Regeneration & Investment Strategy	10
<b>4.0</b> Telecommunications & Broadband	10
<b>4.5</b> Broadband	11
<b>4.16</b> Mobile Data Coverage	14
<b>5.0</b> Energy Supply	15
<b>5.7</b> Renewable Energy	17
<b>5.11</b> Wind	17
<b>5.16</b> Solar (Photovoltaic)	19
<b>5.17</b> Hydro Electricity	19
<b>4.18</b> Tidal	19
<b>5.20</b> Heat	20
<b>5.21</b> Biomass	20
<b>5.22</b> Biogas	20
<b>5.26</b> Connections to Electricity Grid	21
<b>5.30</b> Natural Gas	22
<b>6.0</b> Waste Management	24
<b>6.2</b> Strategic Planning Policy Statement	24
<b>6.14</b> Waste Management Plan	26
<b>6.18</b> Waste Processing within Newry, Mourne & Down District Council	27
<b>7.0</b> Flood Risk, Drainage & Water Supply	28
<b>7.1</b> Flood Risk	28
<b>7.13</b> Drainage	30
<b>7.17</b> Sewage Facilities Waste Water Treatment Works (WWTW)	32
<b>7.25</b> Water Supply	33
<b>8.0</b> Conclusions	34



## **APPENDICES**

- Appendix A:** Housing Evaluation Framework
- Appendix B:** Wind Turbine Application Determinations within NM&D Between 2002 and 2015
- Appendix C:** Northern Ireland Electricity Heat Map
- Appendix D:** 1/100 Year Climate Change Floodmap Downpatrick
- Appendix E:** 1/100 Year Climate Change Floodmap Newcastle
- Appendix F:** 1/100 Year Climate Change Floodmap Newry
- Appendix G:** Waste Water Treatment Works Capacity in NM&D

## **Public Utilities**

**Purpose:** To provide the Council with an overview of matters relating to public utilities and implications for land use in the Newry, Mourne & Down District Council area.

**Content:** The paper provides:

- (i) The regional & local policy context for public utilities and key service providers in the District;
- (ii) An overview of the provision of public utilities in the District;
- (iii) An outline of the main proposals for public utilities.

## 1.0 Introduction

**1.1** The purpose of this paper is to inform members on the provision and spare capacity of public utilities up to 2030 in order to assist judgements on the allocation of housing growth and other development in the Local Development Plan. It sets out the regional context for public utilities and an examination of existing physical infrastructure of the new Council area. It examines initial responses from a number of Government Departments and statutory bodies, including the Council, who have a responsibility for the various public utilities in relation to future supply. This paper allows members to commence consideration of how public utilities can be addressed in the Plan within the context of the Regional Development Strategy (RDS) and the Strategic Planning Policy Statement (SPPS).

**1.2** The provision of public utilities within the District is primarily the responsibility of a number of Government Departments and statutory bodies as well as the Council. The main utilities covered in this paper are:

- Telecommunications
- Energy Supply
- Waste Management
- Flood Risk, Drainage, Water Supply and Sewerage

**1.3** The provision of public utilities involves a large number of stakeholders, including Government Departments, Statutory Bodies, Councils and the private sector, depending on the utility in question. The roles and responsibilities may be summarised as follows:

<b>Public Utility</b>	<b>Flood Risk, Drainage and Water Supply</b>
<b>Organisation</b>	<b>Areas of Responsibility</b>
Department for Infrastructure (DFI), Rivers Agency	Drainage and flood defence
Department of Agriculture, Environment & Rural Affairs (DAERA), NIEA Water Management Unit	Protection of the aquatic environment, through activities including monitoring water quality, controlling effluent discharges, taking action to combat or minimise the effects of pollution.
NI Water	Mains water and sewage treatment
<b>Public Utility</b>	<b>Energy Supply including Renewable Energy</b>
<b>Organisation</b>	<b>Areas of Responsibility</b>
Department for the Economy (DfE)	Regulatory role in relation to energy provision
Northern Ireland Electricity (NIE)	Electricity asset owner of the transmission and distribution



	infrastructure
Private sector	Energy supply
<b>Public Utility</b>	<b>Telecommunications</b>
<b>Organisation</b>	<b>Areas of Responsibility</b>
Ofcom	Regulatory role in relation to telecommunications provision
Department for the Economy (DfE)	Telecommunications Strategy
Private sector	Telecommunications supply
<b>Public Utility</b>	<b>Recycling and waste management</b>
<b>Organisation</b>	<b>Areas of Responsibility</b>
Department of Agriculture, Environment & Rural Affairs (DAERA)	Waste Management Strategy
Department of Agriculture, Environment & Rural Affairs (DAERA) NIEA	Permits, licences and exemptions
Councils	Waste management facilities and infrastructure
Private sector	Recycling and waste disposal

## 2.0 Regional Policy Context

**2.1** The Regional Policy context is provided by the Regional Development Strategy (RDS) 2035 and regional planning policy statements. This section highlights the RDS policy objectives in relation to telecommunications, energy supply, waste management and water, sewerage and flood risk. The relevant policies of the Strategic Planning Policy Statement (SPPS) and Planning Policy Statements (PPS) are set out under the relevant utility headings (sections 3.0, 4.0, 5.0 and 6.0).

### The Regional Development Strategy 2035 (RDS)

**2.2** The RDS sets out clear policy aims and objectives regarding public utilities when allocating housing growth and emphasises the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure.

### Telecommunications

**2.3** Policy RG3 of the RDS recognises the need for an efficient telecommunications infrastructure to give Northern Ireland a competitive advantage. Northern Ireland's core communication network is of high quality which is necessary for sustainable economic growth and investment. Therefore it is important to continually improve international and internal connectivity. The RDS 2035 envisages that next generation broadband services will be available to provide support for 85% of businesses.

**2.4** Spatial Framework Guidance (SFG) 14 of the RDS also recognises that rural areas can be disadvantaged by their remote location in terms of access to essential services. Further innovation and advancements upon the existing rural telecommunication infrastructure will work to lessen this disadvantage.

The key policy aims of the RDS 2035 regarding telecommunications are:

- Invest in infrastructure to facilitate higher broadband speeds, whilst also considering the impact such infrastructure may have on the environment;
- Improve telecommunications services in rural areas to minimise the urban/rural divide;
- Increase the use of broadband; and
- Capitalise on direct international connectivity to support foreign direct investment and to provide a competitive edge.

### **Energy Supply including Renewable Energy**

**2.5** Policy RG5 of the RDS seeks to deliver a sustainable, reliable and secure energy supply to all sectors across the region. The development of new generation or distribution infrastructure will seek to avoid adverse environmental effects, particularly on or near protected sites.

The key policy aims of the RDS regarding renewable energy are:

- Increase the contribution of renewable energy sources, both onshore and offshore, to the overall energy mix;
- Strengthen the grid in order to support the increasing number of renewable electricity installations;
- Encourage new gas infrastructure including provision of natural gas to further enhance the provision of energy supply;
- Work with neighbours to provide competitive regional electricity and gas markets in the EU's internal markets; and
- Develop smart grid initiatives to improve the responsiveness of the electricity grid to trends in customer demands.

### **Waste Management**

**2.6** Policy RG10 of the RDS is directed by the Waste Framework Directive (WFD) (2008/98/EC) which provides the overarching legislative framework. Article 4 of this Directive sets out a 'Waste Hierarchy' as a priority order for waste management. The primary purpose of the Waste Hierarchy is to minimise adverse environmental effects of waste and to increase resource efficiency in waste management and policy.

**2.7** The Waste Hierarchy seeks to minimise the amount of waste brought to landfill through reducing, reusing and recycling waste. Waste disposal should only happen as a fifth and final option (Figure 1).

**2.8** To manage waste sustainably RG10 promotes the use of the 'proximity principle' which emphasises the need to treat or dispose of waste as close as possible to the point of generation in an effort to minimise the negative effects of waste transportation.

Figure 1: Waste Hierarchy



### Water, sewerage and flood risk

**2.9** Policy RG12 of the RDS promotes a more sustainable approach to the provision of water and sewerage services and flood risk management. Increased population, changes in household formation and climate change continue to put pressure on our water resources and drainage systems which may lead to discrepancies in water demand and availability as well as potential impacting on water quality. Planning for the provision of water and sewage infrastructure and treatment facilities is both a practical and environmental necessity for regional development.

**2.10** The Housing Evaluation Framework (HEF) (Appendix A), a tool used to assist judgements on the allocation of housing growth, includes a 'resource test' which states that studies should be carried out to assess and detail physical infrastructure such as water, waste and sewage, including spare capacity. This is to ensure that the infrastructure is adequate to support the provision of future housing.

The key policy aims of the RDS regarding water and sewerage are:

- The integration of water and land use planning. Land use planning should be informed by current water and sewerage infrastructure and the capacity of that infrastructure to absorb future development. This will involve the planning authority working in conjunction with NI Water;
- Manage future water demand by reducing waste. To help manage future water demand in new developments, initiatives such as grey water recycling and rainwater harvesting should be promoted;



- Encourage sustainable surface water management. This will involve the encouragement of initiatives such as Sustainable Drainage Systems (SuDS) in significant development proposals. SuDS endeavour to use natural systems with low environmental impact (such as evapotranspiration) to dispose of dirty water and surface water in order to reduce the amount of water being released back into water courses.

**2.11** In relation to development and flood risk, Policy RG8 of the RDS emphasises the need for mitigating the risk of flooding by avoiding those areas known to be at risk. This position is reflected in the HEF with the Environmental Capacity test including assessment of potential flood risk areas to guide the allocation of land for housing growth.

**2.12** Furthermore, Policy RG1 of the RDS states that when allocating land for economic growth and employment, areas which are at risk of flooding should be avoided, where possible.

**2.13** The RDS is complemented by the Strategic Planning Policy Statement (SPPS). The SPPS does not introduce any significant changes to any of the previous Planning Policy Statements (PPSs) which relate to the provision of public utilities, but helps to shorten and simplify the guidance for councils. The position in terms of the SPPS is summarised within the relevant subject area below.

### **Planning Policy**

**2.14** The following Planning Policy provides the planning policy context for the assessment and determination of utility developments and include:

- PPS 10 - Telecommunications
- PPS 11 - Planning and Waste Management
- PPS 15 - Planning and Flood Risk
- PPS 18 - Renewable Energy
- PPS 21 - Sustainable Development in the Countryside
- A Planning Strategy for Rural Northern Ireland

The key issues from these policy documents and guidance relevant for the LDP preparation include:

- Facilitating the continued development of telecommunications infrastructure but ensuring that visual and environmental impact is kept to a minimum;
- The Council may consult with telecommunications operators over the plan period to ascertain the extent of network coverage in plan area. The Council could consider the allocation of certain sites for the provision of tall masts to encourage site sharing;
- Promoting the development, in appropriate locations, of waste management facilities to meet need as identified by the Waste Management Plan;

- Consideration of the impact of existing or proposed waste management facilities when zoning land for development and ensuring incompatibility of adjacent land uses are avoided. The COMAH Directive (EU Directive 96/82/EC) requires development plans to ensure that appropriate distances are maintained between hazardous substances and residential areas of public use / open space;
- A presumption against development within designated floodplains;
- Promotion of development of renewable energy resources which will not negatively impact on the environment, landscape or amenity of nearby land uses;
- Careful consideration must be given to distinctive landscape areas when considering wind energy proposals;
- Integration of new electricity powerlines and cables into the existing landscape and townscape; and
- Development relying on non-mains sewage will only be acceptable were it does not create or add to a pollution problem.

### **3.0 Newry, Mourne & Down District Council Plans & Strategy**

#### **Newry, Mourne and Down District Council Corporate Plan 2015-2019**

**3.1** The Newry, Mourne and Down District Council Corporate Plan 2015-2019 sets out 8 strategic priorities to be delivered over the plan period. The advocacy for increased broadband and mobile coverage has been identified as one of the key actions for the Council over the plan period.

#### **Newry, Mourne & Down Community Plan 2030 'Living Well Together'**

**3.2** Community Planning came into operation on 1st April 2015 as part of the full implementation of local government reform. Community planning is a process led by a council in conjunction with partners and communities to develop and implement a shared vision for their area, a long term vision which relates to all aspects of community life and which also involves working together to plan and deliver better services which make a real difference to people's lives.

**3.3** The Local Government Act introduces a statutory link between the community plan and a council's local development plan, in that the preparation of the LDP must take account of the Community Plan. It is intended that the LDP will be the spatial reflection of the Community Plan and that the two should work in tandem towards the same vision for a council area and its communities and set the long term social, economic and environmental objectives for an area.

**3.4** The community Plan is to be the overarching strategic plan for integrated planning and delivering of services in Newry Mourne and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards the outcomes in the community plan and it is based on a detailed analysis of future risks and opportunities for Newry, Mourne & Down.

**3.5** With regard to Public Utility provision, a key outcome for the draft Community Plan is that all people in the Newry, Mourne & Down District get a good start in life and fulfil their lifelong potential. The level of connectivity within the District has

been identified as an indicator for achieving this outcome with the level of broadband connectivity a key measure.

**3.6** A clean and quality sustainable environment has also been identified as a key outcome and the use of renewable energy sources e.g. wind, sun will be central to delivery of this which will be discussed in detail in section 5.0

### **Newry, Mourne and Down Economic, Regeneration & Investment Strategy**

**3.7** The Newry, Mourne and Down Economic, Regeneration & Investment Strategy sets out the vision to make the area a vibrant, dynamic and connected region for investment, tourism and culture. Rural Development and Regeneration has been identified as one of the strategy's five key themes.

**3.8** In order to meet the strategic priority of improving infrastructure across rural areas for the needs of rural communities, rural services and rural businesses, the Council will review existing broadband research and data to identify current provision and support broadband research & data with consultation with relevant bodies to identify all infrastructural needs and requirements within the rural areas.

**3.9** The Council will work with Government Departments and statutory bodies to encourage and support the delivery of initiatives across the region which will seek to improve rural infrastructure in order to meet the requirements of rural communities, rural services, and rural businesses.

### **4.0 Telecommunications & Broadband**

**4.1** Modern telecommunications are an essential and beneficial element of everyday living for the people of and visitors to this District. It is important to continue to support investment in high quality communications infrastructure which plays a vital role in our social and economic well-being. Northern Ireland's core telecommunications network is recognised as world class with a high quality communications infrastructure considered essential for sustainable economic growth.

**4.2** Whilst the development of high quality telecommunications infrastructure is essential for continued economic growth it is necessary to minimise the impact on the environment as set out in the SPPS and PPS 10. The SPPS states that the LDP should bring forward policies which set out the detailed criteria for consideration of new telecommunications development in the local area including siting, design and impact upon visual amenity. To inform plan preparation, the Council may consult with telecommunications operators, and other relevant stakeholders, in relation to the anticipated extent of the network coverage required over the plan period. In certain circumstances and, subject to technical limitations on location and siting, the LDP may allocate specific sites for major new telecommunications development.

**4.3** The Council should take account of the potential effects of new telecommunications development, and any necessary enabling works, on visual amenity and environmentally sensitive features and locations. New masts should only be considered where site sharing is not feasible or offers an improved



environmental solution. Operators will be encouraged to site share wherever possible.

**4.4** Until the new Plan Strategy for the whole District has been adopted, elements of PPS 10 remain in place however; if there is a conflict between the SPPS and PPS 10, the SPPS should be accorded greater weight in the assessment of individual planning applications.

### Broadband

**4.5** The broadband market in Northern Ireland is fully privatised with the principal domestic and business provider being British Telecom (BT) with other providers such as Plusnet, EE, SKY, Talk Talk, Virgin Media, FUEL Business and XLN. Northern Ireland currently enjoys the best fixed line broadband infrastructure in the UK although there are some rural areas which still have limited connectivity.

**4.6** Broadband speed is the time it takes to send data to and from your computer and is measured in megabits per second (Mbps, Mbit/s or just Mb). Currently, the speeds available in the UK range from 17Mbps to 76Mbps (Megabits per second) from BT and most other providers (many use BT's network) or from Virgin Media, which has its own independent network with speeds of 50Mbps, 100Mb or 200Mb.

**4.7** Fast internet connections allows the user to move freely around the web with minimal delays for downloading, uploading, moving between sites etc. A slow connection can lead to longer download times, buffering etc. The average urban and rural broadband download speed in the UK is currently 31.3Mbps and 11.6 Mbps respectively compared to 32.5 Mbps and 18Mbps in Northern Ireland.

**4.8** The broadband speeds available are influenced by location, as fibre broadband is still in the rollout phase and the networks don't yet cover the whole country.

*Table 1: Broadband availability in Newry, Mourne & Down*

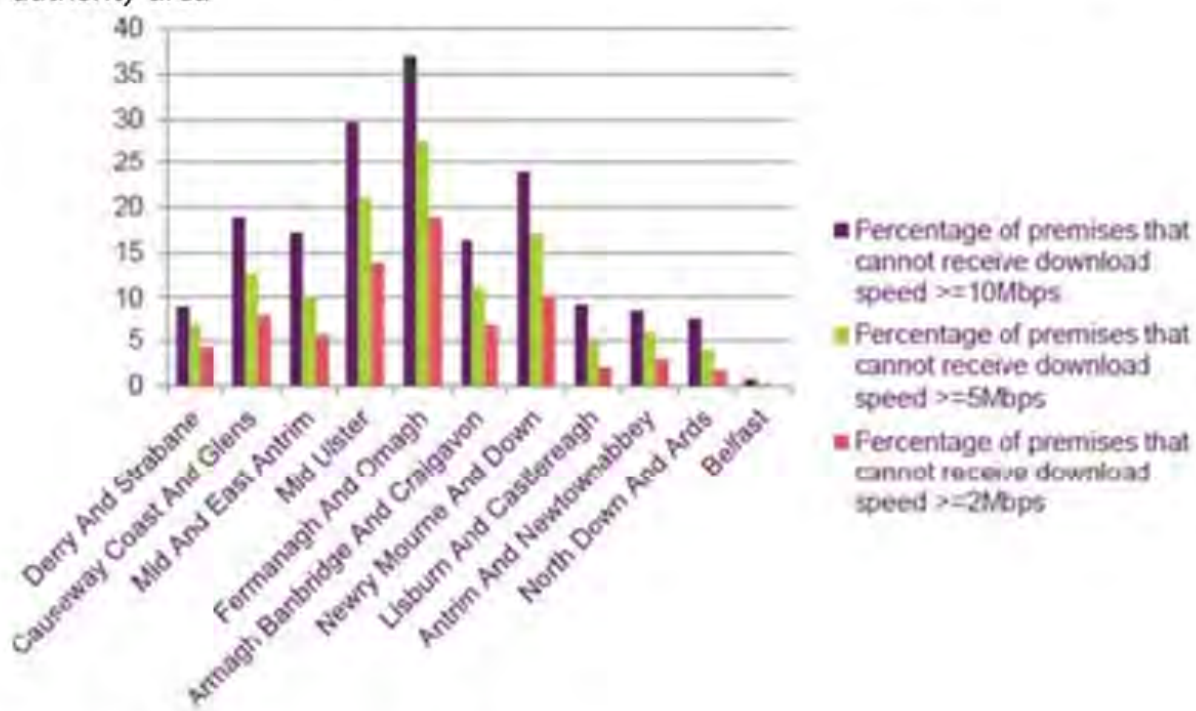
	<b>Newry &amp; Mourne</b>	<b>Down</b>	<b>NI</b>
<b>Average sync speed (Mbit/s)</b>	17.1%	18.9	18.3%
<b>Percentage getting less than 2Mbit/s</b>	18.20%	15.30%	15.6%
<b>Superfast Broadband availability</b>	95.90%	94.50%	93.8%
<b>Broadband take up:</b>	65.8% (of which 23.80% is superfast)	67.60% (Of which 26.40% is superfast)	63.9%
<b>Average data use</b>	28.1 GB/Connection/Month	26.9 GB/Connection/Month	28.9%

Source: <http://maps.ofcom.org.uk/broadband/> (figures as of 2013)

**4.9** In accordance with the aims of the RDS and the SPPS, it is vital to ensure that we continue to improve the broadband network in order to ensure that businesses remain competitive and that rural communities do not feel cut off or isolated.

**4.10** The UK Government intends to introduce a new Universal Service Obligation (USO) that should give everybody the legal right to request a broadband connection capable of delivering a minimum speed of 10Mbps (Megabits per second) by 2020. As detailed below this District does not compare favourably with other Councils. It should be noted however that as the superfast broadband rollout programme nears completion, these figures should see improvements

*Figure 2: The Percentage of premises unable to get 2, 5 and 10 Mbit/s by local authority area*



*Source Ofcom NI Report Dec 2015*

**4.11** There have been numerous improvements to the broadband network which have taken place in recent years and the District has benefited from these:

**Broadband Improvement Project**

**4.12** This project is designed to provide for the first time, improve or increase broadband services in certain areas. Work began in February of 2015 and it is envisaged that work will finish at the end of 2017. Work has already taken place to improve or provide broadband in the following areas within the Newry, Mourne & Down District;

Ardglass	Ballykinler	Ballynahinch	Ballyward
Bessbrook	Crossgar	Crossmaglen	Downpatrick
Forkhill	Jerrettspass	Keady	Kilkeel
Killeavy	Maghera	Mayobridge	Newry
Newtownhamilton	Rostrevor	Saintfield	Seaforde
Strangford			

Source: [www.nidirect.gov.uk/broadband-improvement-project](http://www.nidirect.gov.uk/broadband-improvement-project)

### Northern Ireland Broadband Fund

**4.13** This was a £1.9m fund which was set aside to help support projects which aimed to improve broadband across Northern Ireland. In Newry, Mourne & Down, the following projects benefitted from this fund:

- a) Installation of Fibre To The Cabinet (FTTC) technology to cabinets in the Crossmaglen, Downpatrick, Forkhill, and Newtownhamilton exchange areas; and
- b) Installation of a WiMAX Fixed Wireless Access Network in the District.

**4.14** The installation of apparatus to improve the Broadband network will usually constitute Permitted Development<sup>1</sup> under Part 18 of the Schedule to the Planning (General Permitted Development) Order (Northern Ireland) 2015. As such, it is not envisaged that the planning process will have an impact on the provision of such development.

### Next Generation Broadband Project

**4.15** This project aimed at delivering improved broadband services to small and medium sized enterprises across Northern Ireland. This project is now in its operational phase in that fibre deployment has been completed to all 1,265 telecommunication cabinets across Northern Ireland including Newry, Mourne & Down. Following this project BT completed fibre upgrades to a further 783 cabinets across NI under its own Next Generation Access (NGA) programme. Almost 2,500 cabinets are now fibre enabled with more than 90% of premises in Northern Ireland connected to an enabled cabinet.

<sup>1</sup> Development that does not require Planning Permission through The Planning (General Permitted Development) Order (Northern Ireland) 2015



Table 2: Broadband Improvement Schemes in N.Ireland

	Target	Number of premises in intervention	Cost (BT contribution)
Northern Ireland Superfast NI	Next Generation Broadband Project <ul style="list-style-type: none"> <li>Fibre to 1,288 roadside cabinets</li> <li>Completed in July 2011</li> </ul>	30 000 businesses and 250 000 households	£52m (BT £31m)
	NI Broadband Improvement Project <ul style="list-style-type: none"> <li>Targeting areas with less than 2Mbit/s via 450 FTTC and 150 FTTP nodes</li> <li>Due to complete December 2015</li> </ul>	45 000	£23.7m (BT £4.4m)
	Superfast Extension Programme <ul style="list-style-type: none"> <li>Targeting areas with less than 24Mbit/s via 300 FTTC and 300 FTTP nodes</li> <li>Due to complete December 2017</li> </ul>	39 000	£17m (BT £2.4m)

Source: Ofcom Connected Nations 2015 – Northern Ireland Report

### Mobile Data Coverage

**4.16** Table 3 below sets out the availability of 2G and 3G data coverage in the District as broken down by the historic LGD areas. 3G is the most common type of mobile broadband connection but 4G broadband connectivity is more recent and is the fastest mobile connection available.

Table 3: Mobile Data Coverage 2013

	Area	Geographical Coverage (no reliable signal)	Geographical coverage (all operators)	Premises coverage (no reliable signal)	Premises coverage (all operators)
3G Mobile Data Coverage	Newry and Mourne	21.60%	8.20%	12.40%	31.30%
	Down	5.60%	10.90%	6.10%	17.20%
2G Mobile Data Coverage	Newry and Mourne	24.40%	44.70%	13.80%	61.30%
	Down	1.20%	72.20%	0.60%	69.80%

Source: <http://maps.ofcom.org.uk/mobile-services/mobile-services-data-3G/>

**4.17** The roll out of 4G coverage in Newry, Mourne & Down has commenced by the three main providers EE, O2 and Vodafone. Although there has been good progress to date, the development of 4G coverage across the district remains on-going.

**4.18** Moving forward, it is for the Council to decide if they wish to adopt policies for telecommunications development which are in line with existing policy or if they want to develop a more restrictive policy, for example, having regard for the visual impact of telecommunications infrastructure. To a lesser extent than in the past, concerns amongst some concerning potential health implications also exist, however these concerns remain unfounded.

**4.20** Having evaluated the information available in respect of telecommunications, the options for the council are to:

1. Adopt policies which are in line with existing planning policy contained within Planning Policy Statement 10 (PPS 10) Telecommunications;
2. Develop a more restrictive policy, having regard to concerns over potential health implications, visual and/or environmental impact on the landscape;
3. Develop an approach which promotes the development of telecommunications infrastructure whilst also paying close attention to the impact such development will have. This may mean for example, that certain areas are designated at local policies plan stage as areas where no telecommunications development will be permitted in order to protect sensitive landscapes, provided there is not a recognised 'Not Spot' at that location i.e. no telecommunication coverage at all. Any such policy changes would be brought through the introduction of Countryside Policy Areas.

## **5.0 Energy Supply**

**5.1** The SPPS reinforces the aims of the RDS 2035 in that it seeks to increase the contribution that renewable energy can make to overall energy supply. The policy objectives are to ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed; ensure adequate protection of the region's built, natural, and cultural heritage features; and facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar Design. In relation to electricity lines, current operational policy within the Planning Strategy for Rural Northern Ireland indicates a preference for underground lines to minimise the visual intrusion of overhead lines.

**5.2** In preparing the LDP, the Council should formulate policies and proposals which support a range of renewable energy infrastructure whilst still taking into account the above mentioned policy objectives.

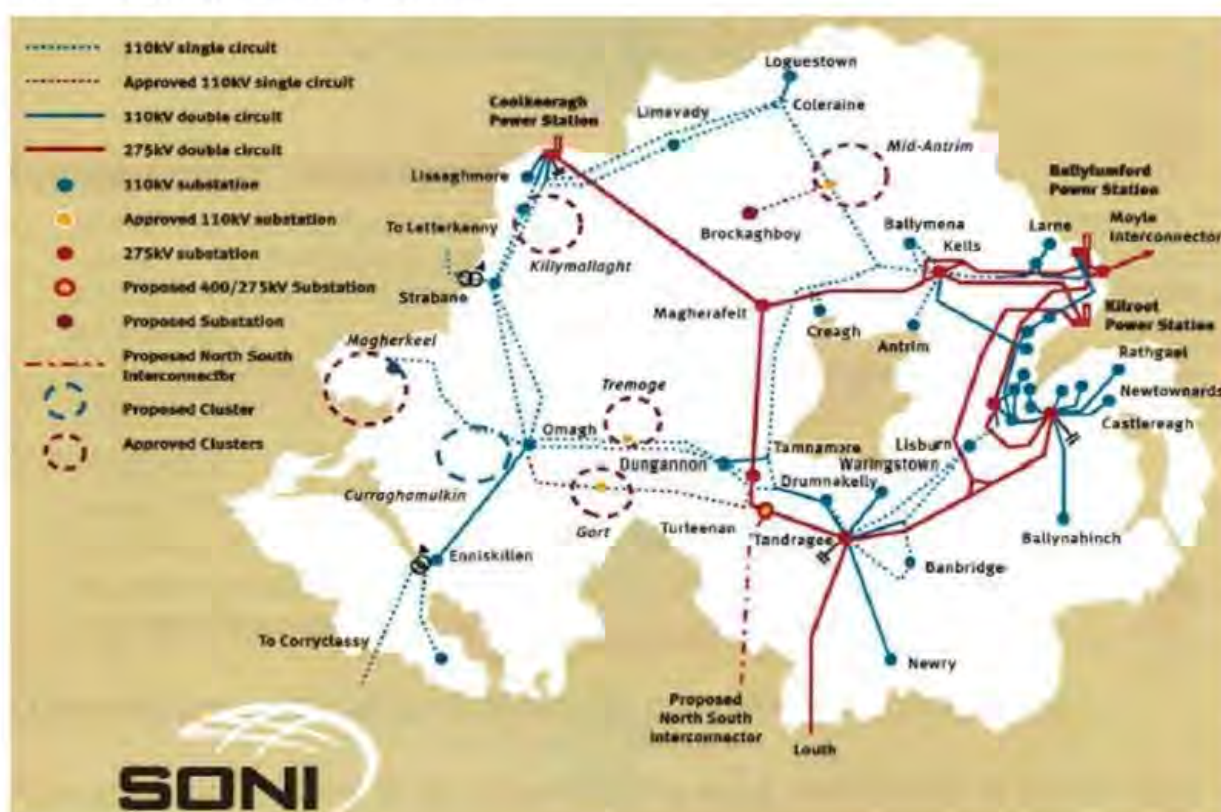
**5.3** Energy in the District is primarily produced by the use of fossil fuels from the three fossil fuel generating plants in Northern Ireland. These plants supply electricity to a wholesale electricity market for the whole island of Ireland known as the Single Electricity Market (SEM). The SEM is served by the North South Interconnector<sup>2</sup>. In addition the Moyle interconnector links Northern Ireland to the electricity grid in Britain which brings additional competition to the electricity generation market.

---

<sup>2</sup> The Tandragee – Louth 275 Kv line is currently the primary means for power to flow between Northern Ireland and the Republic.



Figure 3: NI Transmission System



Source: Soni

**5.4** SONI is responsible for the safe, secure, efficient and reliable operation of the high voltage electricity system in Northern Ireland<sup>3</sup>. SONI works in cooperation with asset owner NIE to develop the grid infrastructure. This is needed to support competition in energy, to promote economic growth and to facilitate renewable energy. No substantial SONI projects have been proposed within this District, SONI however has stated it will engage with SOLACE and Local Authorities to ensure future Developments are considered within the Council's Local Development Plan.

**5.5** To underpin economic growth in the District, it is necessary to have a modern and sustainable economic infrastructure including robust electricity connections. Whilst electricity supply in the Council area and NI as a whole is not an issue, the upsurge in the number of renewable energy developments, particularly wind turbines seeking to connect to the electricity grid, has highlighted that grid reinforcement is required to facilitate the growth of renewable energy generation. Newry, Mourne & Down's geographical location presents opportunities to create physical links to the electricity network for the Republic of Ireland.

**5.6** The SPPS is clear that overhead power lines should avoid areas of landscape sensitivity including Areas of Outstanding Natural Beauty (AONB's).

<sup>3</sup> Following a European Commission decision with respect to responsibility for planning investments for the Northern Ireland electricity transmission network, Northern Ireland Electricity Networks' (NIE Networks') transmission investment planning activities transferred to the System Operator Northern Ireland (SONI) on 1 May 2014.



## Renewable Energy

**5.7** The European Commission's Renewable Energy Directive (2009/28/EC) establishes overall policy for the production and promotion of energy from renewable sources in the EU and specifies national renewable energy targets for each country. The Strategic Energy Framework (DETI 2010) states that Northern Ireland will seek to achieve 40% of electricity consumption from renewable sources by 2020. In line with this, the Northern Ireland Executive in their Programme for Government 2011-2015 (PFG) set a target that by 2015, 20% of all electricity would be generated from renewable sources.

**5.8** For the 12 month period April 2015 to March 2016, 25.4% of total electricity consumption in Northern Ireland was generated from renewable sources located in Northern Ireland. This represents an increase of 5.5 % on the previous 12 month period (April 2014 to March 2015). In the 12 month period ending June 2009, some 8.1% of the total electricity consumption in Northern Ireland was generated from renewable sources (*Source Department for the Economy*). This figure outlines significant growth in the renewable sector over recent years, between the twelve month period ending June 2009 and the twelve month period ending April 2015, there has been a rise of around 142% in average renewable generation volumes. Therefore continued development of renewable energy resources is vital to facilitating the delivery of international and national commitments on both greenhouse gas emissions and renewable energy and progress towards the current PFG objective of living and working sustainably and protecting the environment<sup>4</sup>.

**5.9** New private forms of renewable energy development are likely to increase in use in the Newry, Mourne and Down area over the plan period and will require connection to the electricity network.

**5.10** The main sources of renewable energy are the wind, the sun (solar), moving water (hydropower), heat extracted from the air, ground, water (including geothermal energy), biomass (wood, biodegradable waste and energy crops) and gas (bio and landfill). The key issues regarding each of these energy sources are discussed below:

### Wind

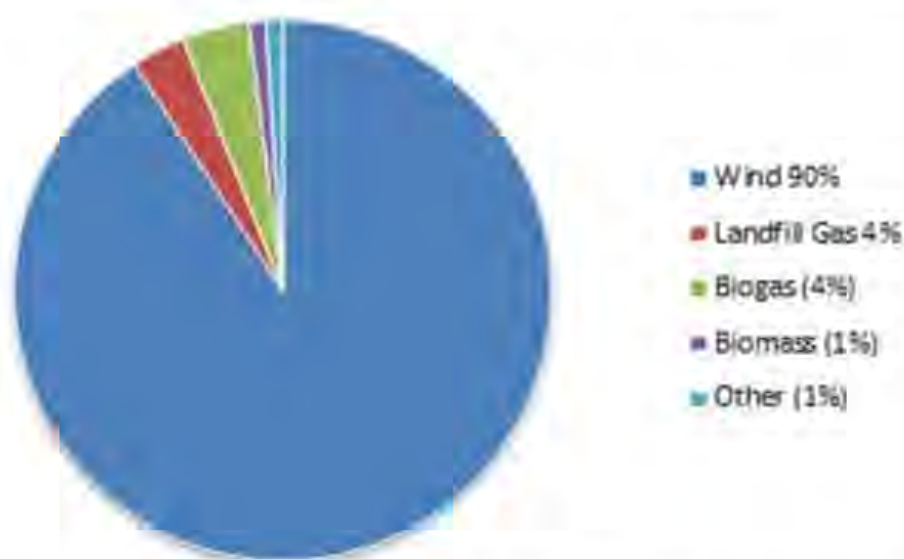
**5.11** Electricity generated by onshore wind farms is the most established, large scale source of renewable energy in NI. Over the 12 month period April 2015 to March 2016, 90% of all renewable electricity generated within Northern Ireland was generated from wind (see figure 4).

**5.12** At present there are no operational wind farms in the Newry, Mourne and Down area, this is in stark contrast to the rest of Northern Ireland where 126 windfarms have been approved. There has however been 321 individual wind turbines of varying sizes approved across the District, these figures are for between 2002 and 2015 (See map Appendix B).

---

<sup>4</sup> Draft Programme for Government 2016 – 2021 Outcome 02

Figure 4: Renewable electricity generation by type of generation April 2015 to March 2016



Other includes Hydro, Tidal, Combined Heat & Power and Photovoltaic (PV)

Source: Department for Economy

**5.13** Public attitude towards wind energy development is changing. Newry, Mourne and Down District contains some of the most scenic landscapes including the AONB areas surrounding Slieve Gullion, the Mournes, Slieve Croob, Strangford and Lecale which encompass 55% of the District. There are concerns regarding the proliferation of single turbines and resulting visual intrusion, safety and the increasing size and massing of turbines and interference through noise and flicker.

**5.14** Having evaluated the information available in respect of wind energy, the options for the Council are to:

1. Adopt policies which are in line with existing planning policy contained within Planning Policy Statement 18 (PPS 18) Renewable Energy and the Best Practice Guidance to PPS18;
2. Develop a more restrictive policy, having regard to concerns relating to impacts on AONBs and sensitive landscapes, bio-diversity and tourism;
3. Adopt a policy position that recognises the value of wind energy development but provides policy which gives greater weight to environmentally sensitive areas and greater protection to neighbouring amenity. Any such policy changes would be brought through the introduction of Countryside Policy Areas.

**5.15** As outlined earlier, Northern Ireland is on course to meet the targets of 40% of electricity consumed from renewable sources by 2020 set out by the Strategic Energy Framework and has met the 20% target set out in the 2011-15 PFG by the NI Executive. Consequently, a more restrictive policy may hinder the progress made thus far and reverse the positive trends experienced to date. By adopting option 3, the Council would be able to continue to support renewable wind energy



development whilst also safeguarding areas which are considered to be of particular scenic value and also reducing potential impacts on neighbouring properties. The impact of onshore Wind Turbine applications will be considered further in the Landscape Character and Rural Pressure Analysis Papers.

### **Solar (Photovoltaic)**

**5.16** Active solar photovoltaic (PV) technologies generate electricity from daylight. The most common form of device is a solar panel or module typically 0.5 to 1 m<sup>2</sup> in size, dark in colour and having low reflective properties. Although roof mounted is most common, modules can be mounted on sides of buildings, or on free standing support structures on the ground. A number of modules are usually connected together in an array to produce the required output, which can vary from a domestic scale panel on e.g. residential buildings / farms of just a few square metres to several hundred square metre industrial scale panels. In most cases involving dwelling houses, providing the building is not listed or in a conservation area and the installation complies with the relevant constraints, PV will be 'permitted development' and a planning application will not be required. Passive Solar Design (PSD) is an environmentally benign approach to ensure that domestic scale buildings capture maximum light and heat from the sun whilst being positioned in the landform to act as a buffer against the worst of the elements. As of 1<sup>st</sup> April 2015 55 solar applications have been processed within the District area of which 54 have been approved. One example of a larger solar application is the approved application for a 5.1MW Photovoltaic solar farm at Tullynaskeagh Road, Downpatrick. It should be noted that the number of operational panels is likely to be much higher as some panels may qualify as permitted development and therefore did not require a planning application. To date, operational planning policy regarding solar power has not raised any particular key issues.

### **Hydro Electricity**

**5.17** Water flowing from a higher to a lower level drives a turbine which produces mechanical energy. This mechanical energy is usually turned into electrical energy by a generator. There are no large scale hydroelectric schemes in the District although recently there has been an upsurge in planning applications for small scale schemes, particularly in the Newry and South Armagh area. Hydro developments anticipated will generally small in scale and subject to design, ecological and fisheries considerations being carefully assessed this type of renewable energy development is unlikely to cause significant concern.

### **Tidal**

**5.18** Tidal power or tidal energy is a form of hydropower that converts the energy obtained from tides into useful forms of power, mainly electricity. Although not yet widely used, tidal power has potential for future electricity generation. Tides are more predictable than wind energy and solar power. Among sources of renewable energy, tidal power has traditionally suffered from relatively high cost and limited availability of sites with sufficiently high tidal ranges or flow velocities, thus constricting its total availability. However technological developments and improvements, both in design (e.g. dynamic tidal power, tidal lagoons) and turbine



technology (e.g. new axial turbines, cross flow turbines), indicate that the total availability of tidal power may be much higher than previously assumed, and that economic and environmental costs may be brought down to competitive levels.

**5.19** SeaGen is the world's first large scale commercial tidal stream generator. It was four times more powerful than any other tidal stream generator in the world at the time of installation. The first SeaGen generator was installed in Strangford Narrows between Strangford and Portaferry in April 2008 and was connected to the grid in July 2008. It generated 1.2 MW for between 18 and 20 hours a day while the tides are forced in and out of Strangford Lough through the Narrows. Strangford Lough was also the site of the very first known tide mill in the world, the Nendrum Monastery mill where remains dating from 787 have been excavated. At present there are no new approvals for tidal energy within the District.

## Heat

**5.20** Ground source heat pumps operate by circulating water (or another fluid) through pipes buried in the ground. The water temperature in the pipes is lower than the surrounding ground and so it warms up slightly. This low grade heat is transferred to a heat pump, which raises the temperature to around 50°C. Water source heat pumps operate in a similar way, with the pipes being submerged in water. Air source heat pumps extract heat in the air and use a fan to draw air over coils that extract energy. Air-source heat pumps can be located in the roof space or on the side of a building. They are similar in appearance to air conditioning boxes. To date, existing operational policy has not raised any significant issues with these types of renewable energy developments subject to careful planning consideration including archaeological implications.

## Biomass

**5.21** Biomass fuels, including wood and energy crops, can be utilised to provide energy either by combustion or fermentation / digestion technologies.

There are currently three main categories of biomass plant:

- Plant designed primarily for the production of electricity;
- Combined heat and power plant (CHP); and
- Plant designed for the production of heat.

## Biogas

**5.22** Biogas typically refers to a mixture of different gases produced by the breakdown of organic matter in the absence of oxygen. Biogas can be produced from raw materials such as agricultural waste, manure, municipal waste, plant material, sewage, green waste or food waste. Biogas is a renewable energy source and in many cases exerts a very small carbon footprint.

**5.23** Emissions and waste products from biomass energy production include airborne emissions, emissions to watercourses and ash. Anaerobic digestion (AD) is a process which bacteria break down organic material in the absence of oxygen to

produce a methane rich biogas. This can be combusted to generate electricity. Thermal processes can also be used extract energy from waste. These processes use a high temperature to release the chemical energy in the fuel. Planning issues from these renewable energy developments that require consideration include:

- Visual intrusion-the plant is an industrial feature with a chimney;
- Noise from plant and traffic operations;
- Any effects on health, local ecology or conservation from the plant and air / waterborne emissions; and
- Traffic to and from the site in order to transport biomass fuel and subsequent by-products.

**5.24** Landfill gas is produced by wet organic waste decomposing under anaerobic conditions which then releases a biogas. The waste is covered and mechanically compressed by the weight of the material that is deposited above. This material prevents oxygen exposure thus allowing anaerobic microbes to thrive. This gas builds up and is slowly released into the atmosphere if the site has not been engineered to capture the gas. If the site has been engineered appropriately however, this gas can be burned and used to generate energy.

**5.25** Having evaluated the information available in respect of biomass development, the options for the council are to:

1. Adopt policies which are in line with existing planning policy within Planning Policy Statement 18 (PPS 18) and the related Best Practice Guidance to PPS18 and within Planning Policy Statement 11 (PPS 11) Planning and Waste Management in the case of biomass from waste.
2. Develop a more restrictive policy, having regard to concerns over environmental impact, visual impact and amenity impact.

### **Connections to Electricity Grid**

**5.26** The electricity network in NI is facing an unprecedented demand for the connection of renewable generation. The total amount of renewable generation already connected to the network is 729MW, with a further 455MW committed to connect. Renewable energy connection is very reliant on the existing infrastructure. However at present the transmission and distribution networks cannot provide, on an unrestricted basis, for all of this connected renewable generation.

**5.27** Since the introduction of increased Renewable Obligation Certificate (ROC) incentives for small scale generation in April 2010, there has been a large increase in the amount of small scale generation either connected to, or committed to connect to the 11kV network. NIE have produced an 11kV network heat map (February 2015) to provide guidance on capability of the 11kV network to accept further small scale generation (see Appendix C). This heat map identifies where investment is currently required. This map is a simple visual representation however it displays that in the Newry, Mourne & Down District Plan Area locations such as Lecale, Slieve Croob and Newtownhamilton are already at saturation point.

**5.28** The existing energy infrastructure needs to be overhauled to ensure it will be fit for purpose. This includes strengthening the grid and developing smart grid initiatives. The upgrading of the electricity grid will involve more overhead powerlines and power installations. The following table provides details of the various projects presently underway or planned in NI to aid renewables integration into the electricity network:

<b>Short Term Plan (STP)</b>
Increasing capacity of existing 110kV network by using Dynamic Line Rating techniques combined with selective up-rating- Work Completed.
<b>Medium Term Plan (MTP)</b>
Series of individual projects designed to reinforce 110kV network to increase capacity & remove bottlenecks-Work on-going.
<b>Renewable Integration Development Plan (RIDP) &amp; Network 25</b>
The RIDP has identified the issues which will arise due to the connection of renewable generation (in the north and west of NI) & in 2013 the project had arrived at a preferred overall scheme option. The scheme involves new extra high voltage, 275 and 110 kV infrastructure and the uprating of some existing circuits. However, phase 4 of the RIDP is now focused on the preparation of a transmission plan for the whole of NI (Network 25) supported by an associated Strategic Environmental Assessment.
<b>Generation Cluster Infrastructure</b>
To facilitate the connection of renewable generation to the grid NIE will 'cluster' their arrangements for the connection of generators (generally onshore wind farms) so that generators will share transmission network infrastructure as far as possible. Clustered connections generally involve the construction of a 110/33kV substation, connection to the 110kV network & individual 33kV generation connections. There are to be at least 7 cluster substations developed before 2020.
<b>New North South Interconnector (NSI)</b>
The proposed new interconnector will require the construction of a new 275/400kV substation & a new 400kV overhead line between Turleenan (Dungannon) and Woodland (Meath). A planning application was submitted in December 2009, the Environment Minister referred the application to the Planning Appeals Commission (PAC) and a Public Inquiry commenced in March 2012. An updated planning application, relating specifically to the works associated with the construction of overhead lines & towers was submitted to DOE in April 2013. Following a period of public consultation, this application has been returned to the PAC for recommencement of the Inquiry.

**5.29** It must be noted that in terms of the current planned and ongoing projects within Northern Ireland detailed within the RIDP & Network 25 along with the general Cluster Infrastructure, none of these works fall within this Council area.

### **Natural Gas**

**5.30** Natural gas was first introduced to Northern Ireland via the Scotland to Northern Ireland gas pipeline in 1996. Initially, natural gas was made available to customers in Greater Belfast, the immediate surrounding area and Larne where the gas distribution network has been developed by Phoenix Natural Gas (PNG). By the

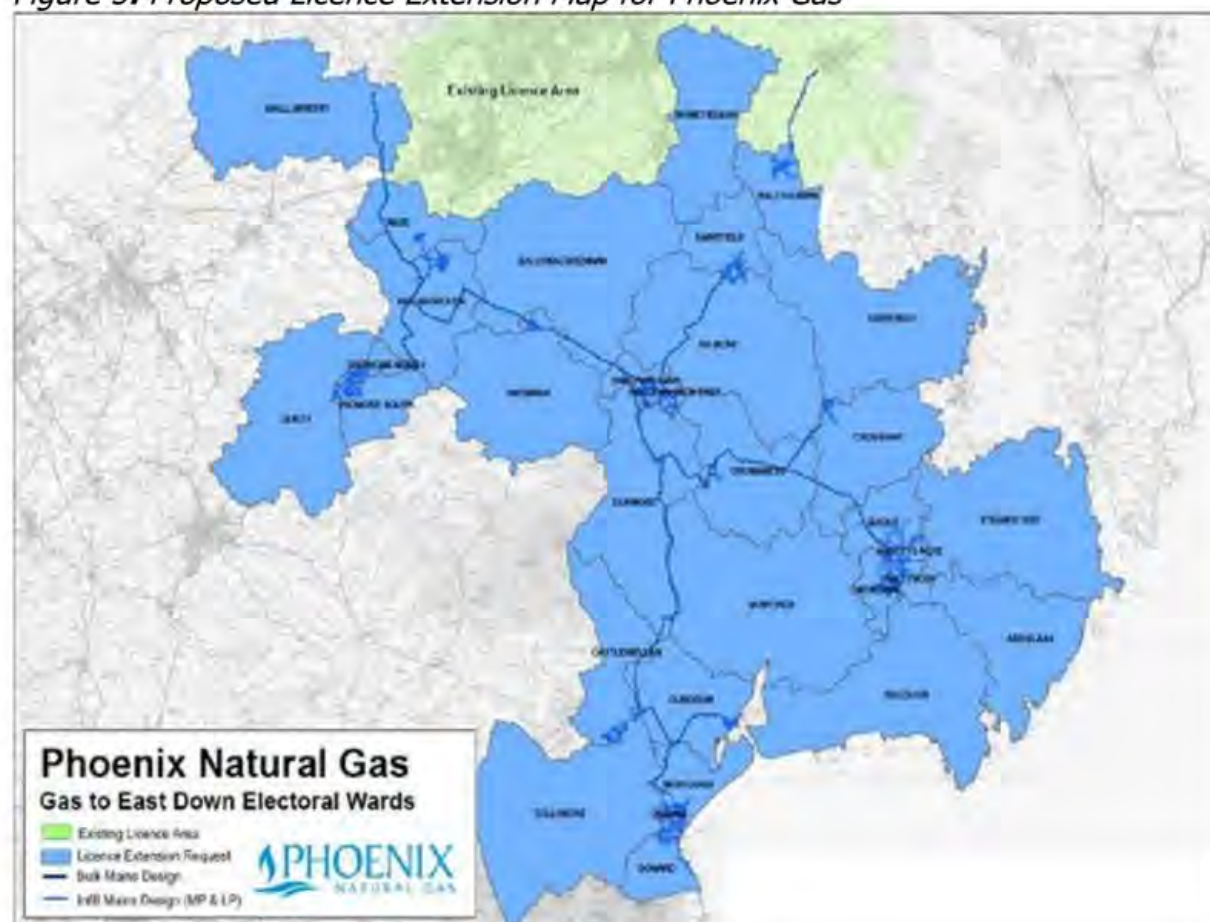


end of 2014, natural gas was available to circa 307,000 properties in this area, with around 182,000 actually connected to natural gas.

**5.31** Firmus Energy (Firmus) is engaged in work to develop the natural gas market outside Greater Belfast along the routes of the North-West gas transmission pipeline (completed November 2004) and the South-North gas transmission pipeline (completed October 2006). This work involves rolling out the gas distribution network in the 10 towns and cities across Northern Ireland including Newry, the others include Derry, Limavady, Ballymena, Ballymoney, Coleraine, Craigavon, Antrim, Banbridge and Armagh. To date, Firmus has connected around 25,000 customers in the 10 towns area, including taking natural gas to some additional urban areas, such as Warrenpoint.

**5.32** In December 2015, the Utility Regulator approved an extension of Phoenix Gas' gas conveyance licence to East Down. This proposed extension encompasses 13 new towns for development and requires capital expenditure in excess of £58m and will make gas available to around 27,000 properties. Settlements within the District to be served by the extension include Ballynahinch, Drumaness, Saintfield, Downpatrick, Castlewellan, Newcastle and Dundrum.

*Figure 5: Proposed Licence Extension Map for Phoenix Gas*



Source: Utility Regulator

## 6.0 Waste Management

**6.1** The policy framework for the delivery of Waste Framework Directive is set out in the 2013 Revised Waste Management Strategy, containing actions and targets to meet the EU Directive and related Programme for Government targets. It sets targets of achieving a recycling rate of 50% of household waste by 2020 (EU Directive target) and a recycling rate of 45% of household waste by 2025 (PfG Target). Local Authority collected municipal waste has a recycling rate target of 60% by 2020. The document also sets out a number of proposals in relation to reducing the amount of food waste sent to landfill in Northern Ireland. By encouraging more people 'to reduce, re-use and recycle' and 'let's recycle more', steady progress is being made in limiting the amount of waste sent to landfill.

### Strategic Planning Policy Statement

**6.2** The SPPS supports wider government policy and in line with the RDS, promotes the 5 step Waste Hierarchy and the proximity principle. It sets three policy objectives for waste management:

- Promote development of waste management and recycling facilities in appropriate locations;
- Ensure that detrimental effects on people, the environment, and local amenity associated with waste management facilities (e.g. pollution) are avoided or minimised; and
- Secure appropriate restoration of proposed waste management sites for agreed after-use.

**6.3** Council should set out policies and proposals in the LDP that support the above-mentioned aims and policy objectives, tailored to the local circumstances of the plan area.

**6.4** The Council must assess the likely extent of future waste management facilities for the plan area. Specific sites for the development of waste management facilities should be identified in the LDP together with key site requirements. The COMAH Directive (EU Directive 96/82/EC) requires development plans to ensure that appropriate distances are maintained between hazardous substances and residential areas of public use/open space.

**6.5** Sites and proposals for waste collection and treatment facilities must meet one or more of the following locational criteria:

- It is located within an industrial or port area of a character appropriate to the development;
- It is suitably located within an active or worked out hard rock quarry or on the site of an existing or former waste management facilities including a land fill site;
- It brings previously developed, derelict or contaminated land back into productive use or where existing or redundant buildings can be utilised;



- In the case of civic amenity facilities, the site is conveniently located in terms of access to service a neighbourhood or settlement whilst avoiding unacceptable adverse impact on the character, environmental quality and amenities of the local area; or
- It is suitably located in the countryside, it involves the reuse of existing buildings or is on land within or adjacent to existing building groups. Alternatively where it is demonstrated that new buildings/plant are needed these must have an acceptable visual and environmental impact.

**6.6** In the case of a regional scale waste collection or treatment facility, its location should relate closely to and benefit from easy access to key transport corridors and where practicable make use of the alternative transport modes of rail and water.

**6.7** LDPs should also identify the need for appropriate waste management facilities within new development. A presumption in favour of waste collection and treatment facilities, and waste disposal (land filling and land raising) will apply where a need for such development is identified through the Waste Management Strategy and the relevant Waste Management Plan (WMP). In the case of Waste Water Treatment Works, need must be demonstrated to the satisfaction of the Department or relevant authority.

**6.8** In all circumstances particular attention should be given to the potential impacts of existing and approved waste management facilities on neighbouring areas and the need to separate incompatible land uses.

**6.9** Following the Publication of the SPPS, until such times as a Plan Strategy for the whole of the Council area has been adopted; planning authorities will apply existing policy contained within Planning Policy Statement 11 (PPS 11): Planning and Waste Management together with the SPPS. Any relevant supplementary and best practice guidance will also continue to apply. Any conflict between the SPPS and any policy retained under the transitional arrangements must be resolved in the favour of the provisions of the SPPS.

**6.10** Where a council adopts its Plan Strategy, existing policy retained under the transitional arrangements shall cease to have effect in the district of that council and shall not be material from that date, whether the planning application has been received before or after that date.

**6.11** PPS 11 promotes the development, in appropriate locations, of waste management facilities to meet need as identified in the WMP. Consideration of the impact of existing or proposed waste management facilities should also be given when zoning land for development and ensuring incompatibility of adjacent land uses is avoided.

## **Arc 21**

**6.12** Newry, Mourne & Down Council falls within the Arc 21 region. Arc 21 is an umbrella waste management group for 6 councils in the east of Northern Ireland. Arc21's aim is to encourage households and businesses to 'Reduce, Re-use and Recycle' as much as possible, and deliver new waste infrastructure facilities to



manage waste efficiently and in an environmentally-friendly manner. At present Arc 21's region accounts for 54% of all Northern Ireland's municipal waste, 518,000 tonnes per annum

**6.13** Under the provisions of the Waste and Contaminated Land (Northern Ireland) Order 1997 it is the responsibility of the district councils to prepare a WMP for the forward planning of waste management requirements for collecting, recovering, treating and disposing of controlled waste within the region.

**Waste Management Plan**

**6.14** A revision of the Waste Management Plan for the Arc 21 region was determined by the Department of the Environment in September 2015. The Plan provides a framework for waste management provision and a regional network of facilities for all controlled wastes within the Arc 21 region. It establishes the overall need for waste management capacity and details the proposed arrangements to deal with the wastes produced in a sustainable manner.

Figure 6:

**Household waste recycling rate Northern Ireland, 2015/16**



Source: NIEA NI Local Authority Collected Municipal Waste Management Statistics

**6.15** The Arc 21 objectives have been set in the context of the following four principles of sustainable development:

- Social progress which meets the needs of everyone;
- Effective protection of the environment;

- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

**6.16** The principle objective of the Plan is therefore to identify options for managing waste within the Arc 21 region which draws the correct balance between:

- The provision and maintenance of sufficient capacity to deal with the waste produced;
- Meeting strategic targets for recycling and recovery, and potentially for reduction;
- The protection of the environment for present and future generations; and
- Optimising resource utilisation in the Arc 21 region.

**6.17** Application of the Waste Hierarchy to minimise waste production and policies to educate the public, industry and young people in particular, in effective resource use and reuse, recycling and composting is facilitated through the provision of 'bring facilities', bottle banks and civic amenity sites which are the responsibility of the Council.

### **Waste Processing within Newry, Mourne & Down District Council**

**6.18** In 2015/16 the Newry, Mourne & Down District Council area amassed 84,459 tonnes of municipal waste of which a total of 30,643 (36.3%) tonnes was sent for preparation for reuse, dry recycling and composting. A further 23,932 tonnes (28.3%) was sent for waste energy recovery and 29,762 (35.2%) was sent to landfill.

**6.19** The two main landfill sites within the district at Aughnagon and Drumnakelly ceased to be used for the purpose of household waste on April 2015 and May 2016 respectively. Currently 'Black Bin' waste within the district is collected by the council and transferred to private operator for sorting of material appropriate for 'Refuse Derived Fuel' and recovery of recyclable and biodegradable material. Planning permission has been granted at the Councils landfill site at Drumnakelly for a proposed Waste Transfer Station. 'Blue Bin' waste within the District is also transferred to private operators in Newry and Mallusk for processing. Commercial waste disposal is the responsibility of the waste generator and commercial facilities exist in both Killeel and Bessbrook.

**6.20** Newry, Mourne and Down District also has 10 recycling centres located across the District. These centres are located in the following settlements listed below:

Ballynahinch  
 Castlewellan  
 Downpatrick  
 Newry  
 Bessbrook  
 Killeel  
 Newtownhamilton

Crossmaglen  
Warrenpoint  
Hilltown

Outline planning permission has been granted for a more modern facility at Killough Road Downpatrick with a reserved matters application currently under consideration.

**6.21** At present there is no envisaged need for additional or expansion of existing Council operated waste facilities within the District however this will be monitored and updated as the Development Plan progresses. It should also be noted that the recycling and use of waste for energy production is a growth area in the private sector and it is highly likely that during the Development Plan period there will be applications for facilities from the private sector.

## **7.0 Flood Risk, Drainage, Water Supply and Sewerage**

### **Flood Risk**

**7.1** The EU "Floods Directive" (2007/060/EC) came into force on the 26<sup>th</sup> November 2007 and aims to establish a framework that will contribute to reducing the impact of flooding on communities and the environment. Compliance with this Directive is the responsibility of the Rivers Agency which is part of the Department for Infrastructure (DFI) and they have begun implementing the directive by establishing flood risk and hazard maps which were published in 2013.

**7.2** The EU Floods Directive confirms that development can exacerbate flood risk and states that the planning authority has a crucial role to play in managing development so as to reduce the risks and impacts of flooding. The Directive highlights the fundamental importance of preventing or restricting new development in flood prone areas.

Under the Floods Directive, flood risk is managed by:

**Prevention:** avoiding construction of houses and industries in flood-prone areas; by adapting future developments to the risk of flooding; and by promoting appropriate land-use, agricultural and forestry practices.

**Protection:** taking measures, both structural and non-structural, to reduce the likelihood and impact of floods.

**Preparedness:** informing the public about flood risk and what to do in the event of a flood.

**7.3** The SPPS states that the preparation of a LDP affords the opportunity to engage with relevant government departments with responsibility for various aspects of flood risk management thereby fostering a necessary joined up approach to addressing flooding issues. Typically, this will involve considerable engagement with Rivers Agency and the use of the most up to date information on flood risk which will usually be contained in the Strategic Flood Maps. This joined up approach



should also be extended to neighbouring councils in circumstances where flooding and flood risk crosses administrative boundaries.

**7.4** The SPPS also states that LDPs should take account not only of current flood risk but also the likelihood of flood risk in the future and should not allocate land for development which may be prone to flooding.

**7.5** Until the new Plan Strategy is adopted, PPS 15 (Planning and Flood Risk) is to be applied alongside the SPPS. PPS 15 operates a presumption against development within designated flood plains, unless the development is of regional importance or it falls into a pre-defined list of categories such as:

- A replacement building;
- An essential operational development such as utilities infrastructure;
- Sport and recreational uses;
- Minerals development; or
- Seasonal development which will not increase flood risk

**7.6** With specific reference to flooding in each river basin, in December 2015 DARD (now DFI) published specific Flood Risk Management Plans (FRMPs) for the three River Basin areas in Northern Ireland. Two of these Plans cover this District, the Neagh Bann River Basin Flood Risk Management Plan and the North East River Basin Flood Risk Management Plan.

**7.7** Flood Risk Management Plans (FRMPs) are a key requirement of the Floods Directive (Directive 2007/60/EC on the assessment and management of flood risks) and are aimed at reducing the potential adverse consequences of significant floods on human health, economic activity, cultural heritage and the environment. The FRMPs are coordinated at the River Basin District level to align with the Water Framework Directive's River Basin Management Plans and focus on managing the flood risk in the twenty Significant Flood Risk Areas (SFRAs) identified through the Preliminary Flood Risk Assessment (PFRA) for Northern Ireland that was completed by the Department in December 2011. Within this District, the FRMP's encompass the settlements of Newry, Warrenpoint, Newcastle and Downpatrick. Areas identified for further study include Rostrevor, Ballynahinch and Drumaness. In practice, the FRMP's provide the information and evidence necessary to support risk management decision making. The Plans also help promote greater awareness and understanding of the risks of flooding amongst the public, Government Departments, Councils and other organizations. The Council should ensure that the new LDP is compatible with these FRMP's.

**7.8** Rivers Agency Planning Advisory Unit also advises on the flooding potential for individual sites which are the subject of specific planning applications and where flooding is likely to occur. The Planning Advisory Unit will advise on any development where there is a potential to the proposed development or property elsewhere caused by the proposed development. The SPPS will not permit development within the flood plains of rivers or the sea unless it meets prescribed exceptional circumstances.

If not controlled in the correct way, development can increase flood risk by:

- a) Using up land which is required for flood relief pondage;
- b) Allowing new development to take place on land which is in danger of flooding and therefore posing a threat to the safety of that new development;
- c) Increasing the volume of water which is entering a particular watercourse in the form of sewage or industrial effluent runoff.

**7.9** When preparing local policies as part of the LDP process, the Council will seek to ensure that land which has been identified as being at risk of flooding is not zoned for certain types of development such as housing or industry. Such zoning would eradicate the natural function of such land as a flood relief pondage area.

Rivers Agency will be able to advise on the suitability of land for development with respect to flood risk. This includes:

- The Extent of Flood Risk.
- The Mitigation of flood risk.
- Sustainable Drainage Systems.
- Resistance measures against flooding.
- Resilience measures to reduce the impact after flooding occurs.

**7.10** The LDP should take account of the "Climate Change" Flood maps (Appendix D-F) as well as the information contained in the Strategic and Hazard Flood Maps to establish land zonings.

**7.11** There are no current works or definitive proposals for Flood Defence Schemes or Improvements to existing Flood Defence Schemes planned within the District. There are however, a number of possible schemes currently being considered at Design Stage including:

- Newcastle, Shimna River;
- Mayobridge Flood Alleviation Scheme;
- Annsborough Flood Alleviation Scheme (Phase 2).

**7.12** There is also a Feasibility Study currently on-going regarding the Newry, Greenbank Sea Defence Upgrade and a Flood Study of Newry currently being undertaken. It should be noted that subject to viability, flood alleviation schemes can take several years from identification of the requirement through to completion of work. All proposed works are subject to the availability of resources and competing priorities.

## **Drainage**

**7.13** In March 2016, the Department for Infrastructure (DfI) published a long term strategy entitled Sustainable Water: A Long-Term Water Strategy for Northern

Ireland (2015-2040) on the best way forward for managing the water sector in Northern Ireland.

The Strategy highlights that planning policies should promote sustainable water and sewerage services by making appropriate space in development plans for water and sewerage infrastructure. Future local development plans should make provision for both waste water treatment facilities and sustainable drainage systems.

The Strategy identifies four key sections:

- Drinking Water Supply and Demand
- Flood Risk Management and Drainage
- Environmental Protection and Improvement
- Water and Sewage Services

**7.14** Each of these sections sets out aims, policies and actions to achieve Sustainable Water within the lifetime of the Strategy, some of which have been identified to be implemented through the Local Development Plans (LDP), including:

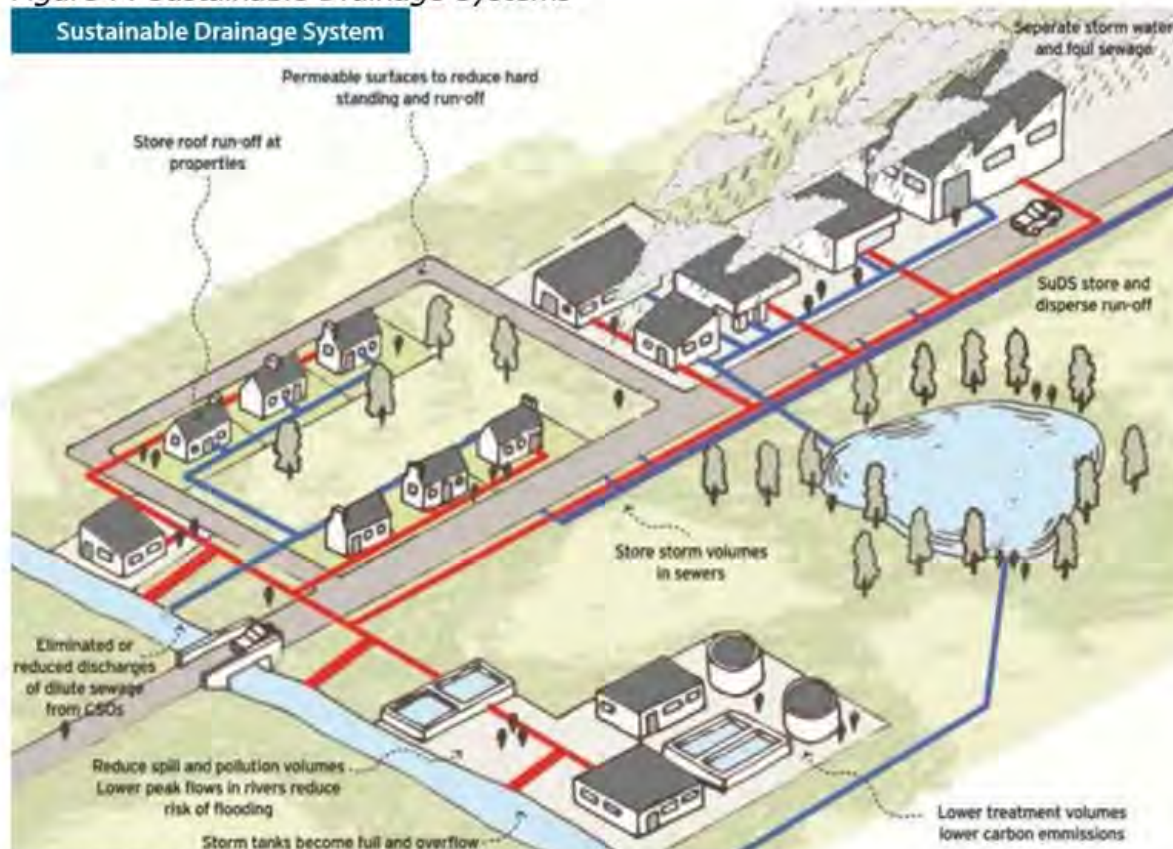
- Make space for surface water management in LDPs – e.g. when zoning suitable land, large surface water drainage schemes such as lakes, wetlands and wet woodland could be created to meet the future drainage needs of the proposed development in an area.
- LDP policy could require, either generally or for specific zonings, that schemes are put in place at design stage so as to minimise surface water runoff. It is preferable that a range of Sustainable Drainage System (SuDS) solutions be employed as these are more sustainable and often less costly than using traditional piped infrastructure. They also offer multiple benefits such as recreation and amenity provision. Examples of such are green roofs, permeable paving, soakaways, ponds and wetlands. The Diagram below shows how Sustainable Drainage Systems work (see figure 7).

**7.16** Taking account of this information, the Council may, when preparing the LDP and local planning policies, try to ensure that the following objectives are realised;

- Ensure the LDP is compatible with and complements the Flood Risk Management Plans published by DFI Rivers Agency.
- Avoid zoning land for habitable development which has been identified as being at risk of flooding, either on the Strategic / Hazard / Climate Change Flood Maps.
- Formulate planning policy which makes drainage a key element of design and which promotes the use of SuDS.



Figure 7: Sustainable Drainage Systems



Source DRD: Sustainable Water

## Sewerage Facilities – Waste Water Treatment Works (WWTW)

**7.17** The provision of sewage treatment facilities across the District is also the responsibility of NI Water.

**7.18** The RDS proposes that Newry, Mourne and Down District Council will need approximately 10,900 new houses from 2012 - 2025 so it is important to bear in mind the impact that this housing need will have on the existing sewage network capacity. Most houses are connected to the existing sewage network, under the SPPS, in all circumstances proposals for development must meet planning and environmental considerations including those for drainage and sewerage.

**7.19** Single houses in the countryside rely on septic tanks, it should be noted that Policy CTY 16 of PPS 21 states that planning permission will only be granted for developments relying on non-mains sewerage where the applicant can demonstrate that this will not create or add to a pollution problem.

**7.20** When preparing the LDP, the potential capacity of the existing sewage infrastructure in an area will have a bearing on the amount and location of new development and whether or not land is zoned for new development. An indication as to the available capacities (headroom) of existing waste water treatment works (WWTW) within the Council area was supplied by NI Water in December 2015 and will be updated through the plan process. The information provided (see appendix

G) at this stage is limited to those settlements served by public treatment facilities serving population equivalents of greater than 50.

**7.21** The information provided to date highlights that the following settlements as having no remaining capacity (headroom) within the business period 2015-2021:

Drumaness  
 Dundrum (Upgrade of this WWTW during 2015-2021)  
 Ballymaderphy  
 Glasdrumman (Armagh)  
 Glen Villas  
 Lurganare  
 Oliver Plunkett Park

**7.22** NI Water maintains all works through a capital maintenance programme and further seeks to address quality and development issues through an enhancement programme which is delivered on a prioritised basis across Northern Ireland within allocated funding. This information will need to be kept under review to ensure an accurate picture of the extent of any constraint placed on development.

**7.23** Proximity to existing WWTW will also be a factor in considering the location of new development land as part of the LDP. When selecting land for development, it is generally desirable to avoid land near established treatment works as these can cause nuisance. Guidelines established between DOE Planning and NI Water set out what can be considered acceptable distances between development and WWTWs. For example, a WWTW with a design equivalent population of 5,000 should not be within 300m of inhabited development.

**7.24** Taking account of this information, the Council may, when preparing the LDP and local planning policies, try to ensure that the following objectives are realised;

- Ensure that development land is zoned in areas where the 'headroom capacity' of existing WWTWs is such that development can be supported by sewerage infrastructure; and
- Avoid zoning land for habitable development in close proximity to existing WWTWs.

### **Water Supply**

**7.25** The responsibility for the provision of water supply across the District is the responsibility of NI Water.

**7.26** NI Water has indicated that it does not envisage any substantive issues that will impinge upon new development. This will be confirmed in a brief statement along with some additional context on on-going programme of Network strengthening and resilience improvements. Where there are instances of planned investment on major capital works e.g. water treatment works upgrade this will be highlighted within the response.



## Reservoirs

**7.27** The Reservoirs Act (Northern Ireland) 2015 aims to ensure that the existing 130-150 reservoirs in Northern Ireland are managed and operated to minimise any risk of flooding due to an uncontrolled release of water resulting from dam failure and therefore protecting people, the environment, cultural heritage and economic activity. It will impose management and maintenance requirements on owners and managers of reservoirs with a volume in excess of 10,000 cubic metres. To facilitate the management of such reservoirs, Rivers Agency has prepared reservoir inundation maps. Where development is proposed in close proximity to a reservoir, the developer will be required to submit a detailed flood risk assessment to show how the development will not be at risk of flooding from the nearby reservoir. Consequently, when preparing the LDP the Council may not wish to allocate land for development close to existing reservoirs. To do so would be to require the developer to carry out a flood risk assessment, thus complicating the planning application process.

## 8.0 Conclusions

**8.1** This paper has provided an overview of utility provision within Newry, Mourne & Down and has looked the existing provision and spare capacity of public utilities over the plan period until 2030. Utility provision in the Local Development Plan must take account of the regional planning framework set out by the RDS and the SPPS to assist judgements on the allocation of housing growth and to ensure that sufficient land is allocated to meet the anticipated needs of the community. The provision of public utilities within the plan area is primarily the responsibility of a number of Government Departments and statutory bodies as well as the District Councils; however the private sector is playing an increasingly important role. In terms of the role of the LDP it is therefore important to recognise that external providers have their own long term strategies and investment plans subject to budget constraint.

**8.2** The LDP will not designate or zone specific sites for public utilities. However in accordance with regional and operational planning policy it will seek to locate new developments which maximise the efficient use of existing utility infrastructure whilst keeping the environmental impact to a minimum.

**8.3** Where proposals to develop new or replace existing public utilities are known, these should be identified in the Plan. Where provision of an existing public utilities is limited and there are no known plans to upgrade during the plan period, development may be constrained as a result of this.

Thus the key elements of any strategy relating to the following themes are identified as follows:

## 8.4 Telecommunications

- Develop an approach which promotes the development of telecommunications infrastructure whilst also paying close attention to the impact such development will have. This may mean for example, that certain areas are designated at local policies plan stage as areas where no telecommunications development will be



permitted in order to protect sensitive landscapes, provided there is not a recognised 'Not Spot' at that location i.e. no telecommunication coverage at all. Any such policy changes would be brought through the introduction of Countryside Policy Areas.

### **8.5 Recycling and Waste Management**

- Facilitate the implementation of the Waste Management Plan when formulating Plan Strategy and Local Policies Plan.

### **8.6 Flood Risk, Drainage and Water Supply**

- Ensure that development land is zoned in areas where the "headroom capacity" of existing Waste Water Treatment Works is such that development can be supported by sewerage infrastructure.
- Avoid zoning land for habitable development in close proximity to existing WWTWs.
- Local development plans should be compatible with and compliment the Flood Risk Management Plans published by DFI Rivers Agency.
- Avoid zoning land for habitable development which has been identified as being at risk of flooding, either on the Strategic / Hazard / Climate Change Flood Maps.
- Formulate planning policy which makes drainage a key element of design and which promotes the use of SuDS.

### **8.7 Energy Supply and Renewables**

- Adopt a policy position that recognises the value of wind energy development but provides policy which gives greater weight to environmentally sensitive areas and greater protection to neighbouring amenity. Any such policy changes would be brought through the Introduction of Countryside Policy Areas.
- In relation to biomass development, adoption of current planning policy would ensure continued support for such development while ensuring potential impacts are minimised.

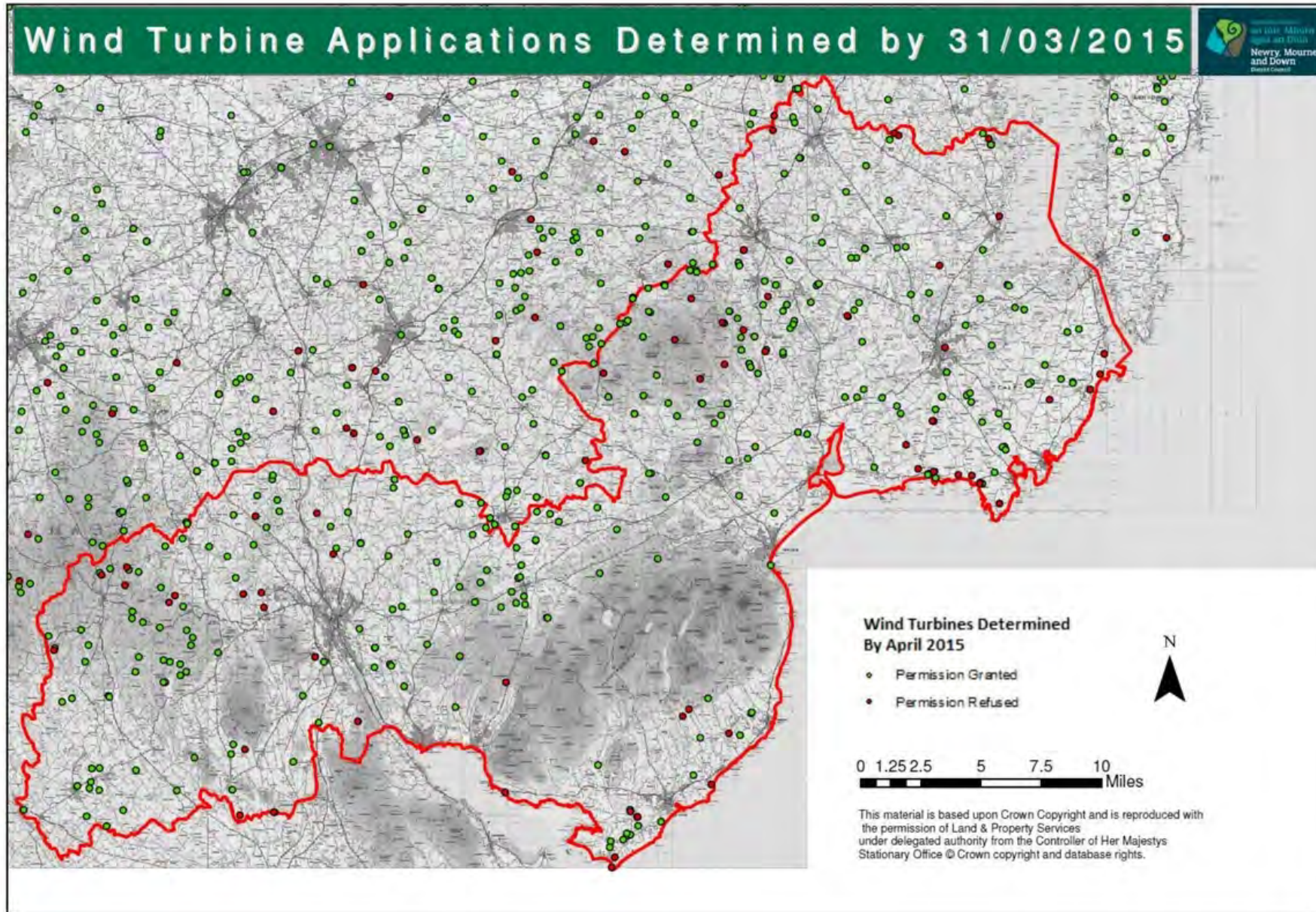
# Appendices

## Appendix A – Housing Evaluation Framework

<b>Housing Evaluation Framework</b>	
<b>Resource Test</b>	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
<b>Environmental Capacity Test</b>	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
<b>Transport Test</b>	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.
<b>Economic Development Test</b>	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
<b>Urban and Rural Character Test</b>	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
<b>Community Services Test</b>	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

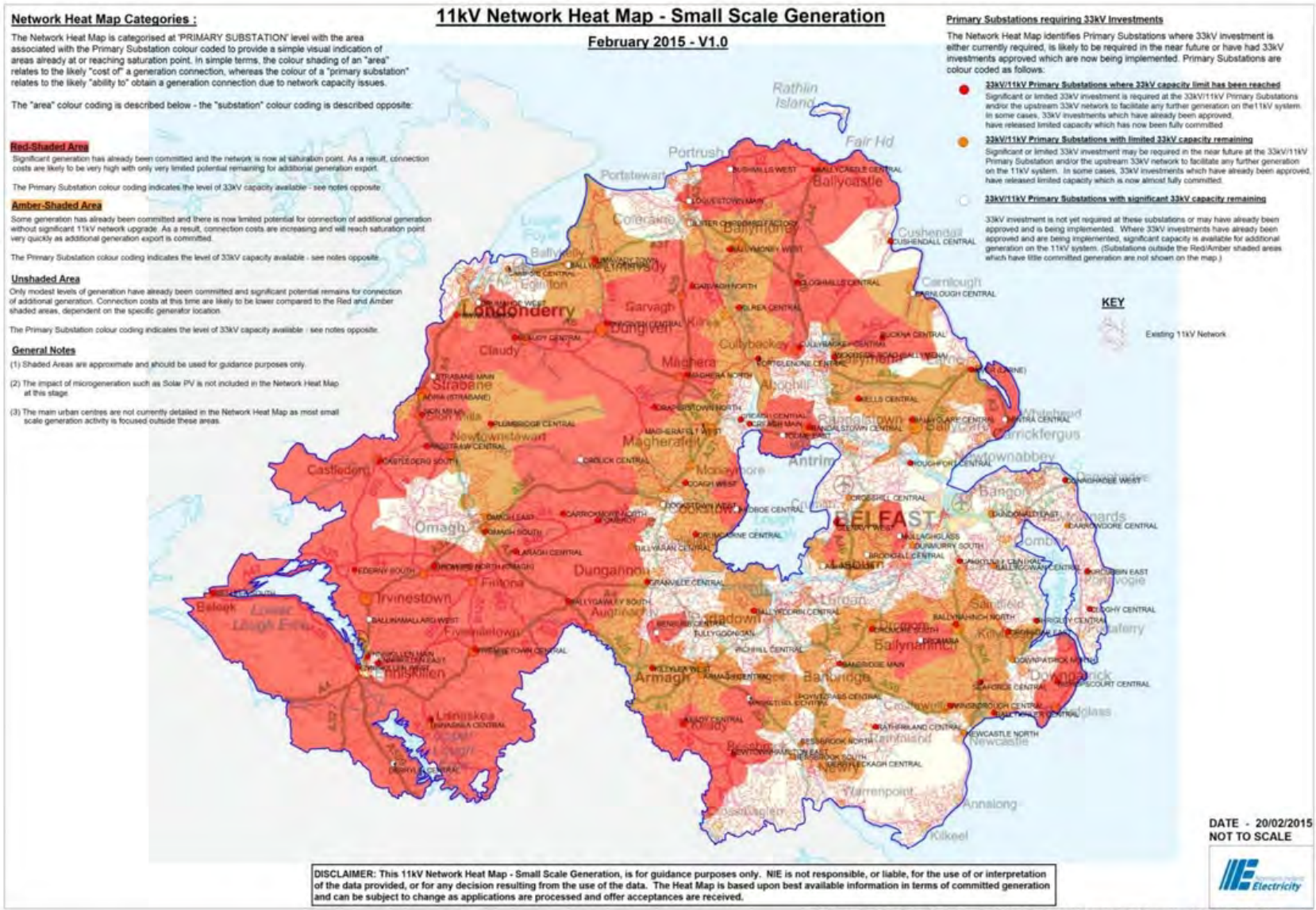


Appendix B – Wind Turbine Application Determinations within NM&D Between 2002 and 2015





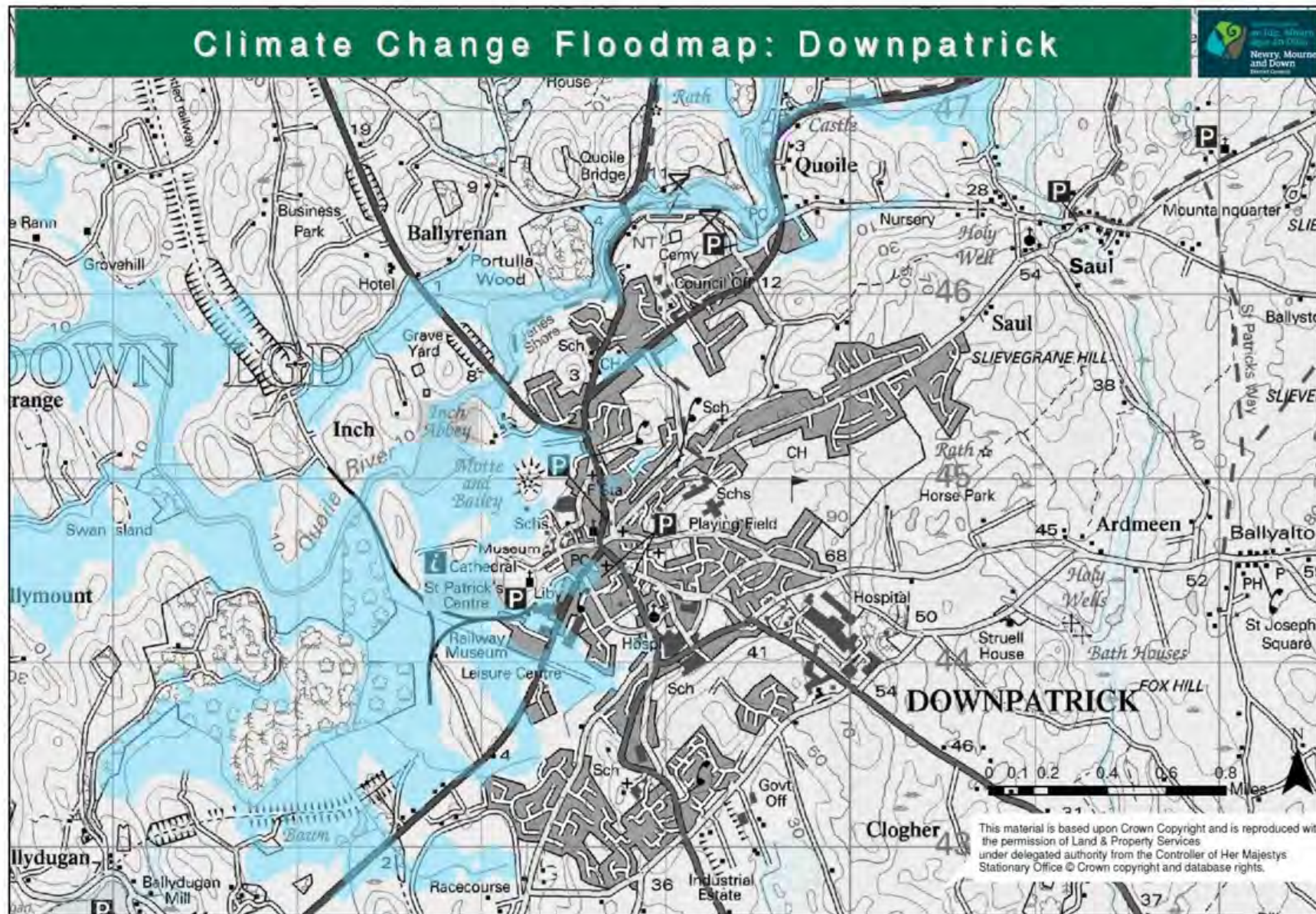
Appendix C – NIE Heatmap



Source: [http://www.nienetworks.co.uk/documents/Generation/SSG\\_HeatMap\\_200215\\_V1.aspx](http://www.nienetworks.co.uk/documents/Generation/SSG_HeatMap_200215_V1.aspx)



Appendix D - 1/100 year Climate Change Floodmap: Downpatrick

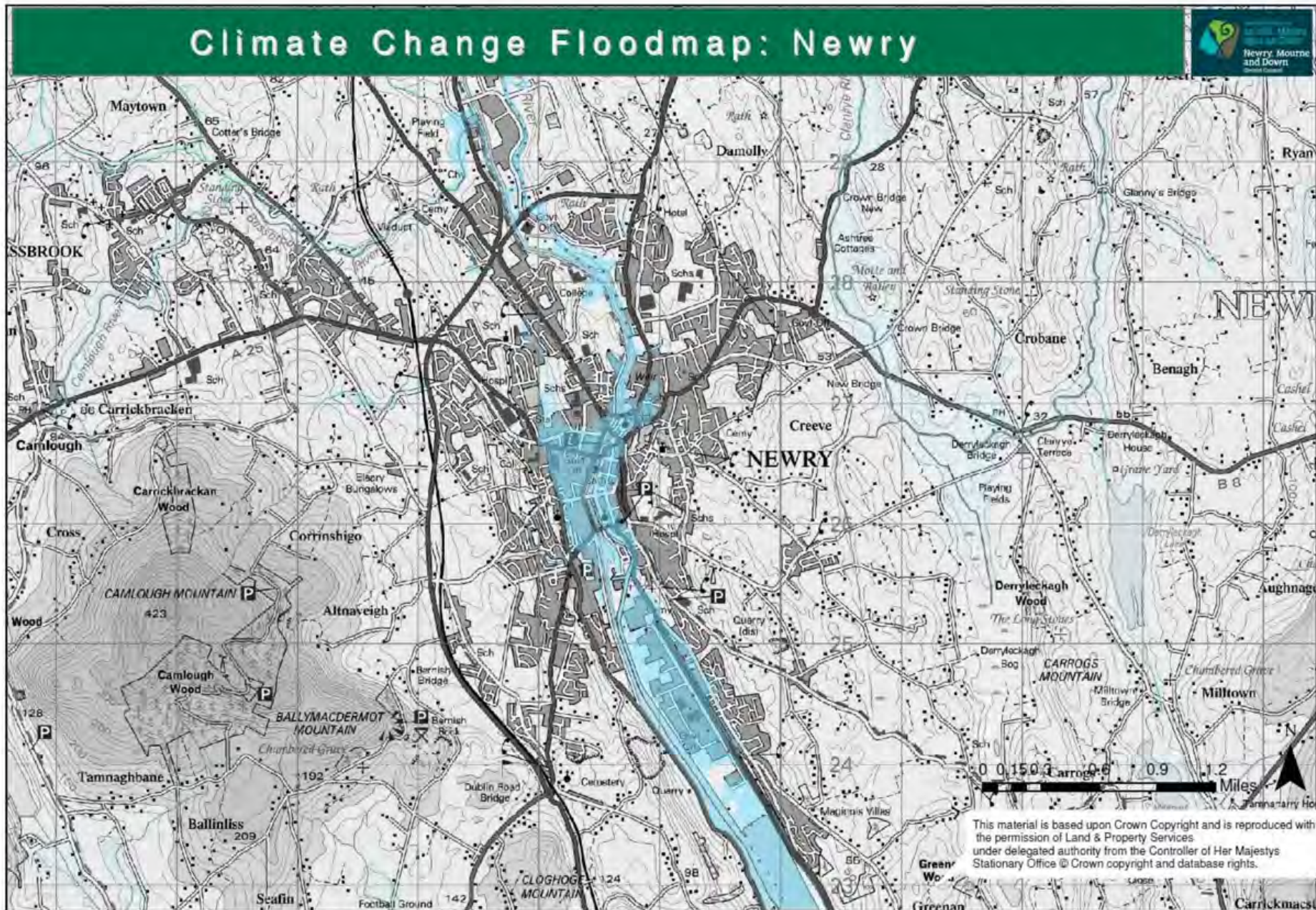








Appendix F: 1/100 Year Climate Change Floodmap: Newry





### Appendix G – Waste Water Treatment Works

As displayed below, NI Water have devised a new informative to convey both the present capacity condition of each of its Wastewater Treatment Works and also how this condition may change depending on a range of potential growth scenarios. The Informative presents two sets of indicators; one relating to current capacity and the associated impact on the availability of new sewerage connections; the second is an estimated projection of treatment capacity were prescribed growth factors to be applied to the existing drainage catchment flows.

Settlement	Name of Works	Current Status	Estimation of Future Capacity based on Growth Factor			Comment
			10%	20%	30%	
Any Town	Any Town WwTW		✓	✓	✓	
Any City	Any City WwTW		⊘	✗	✗	
Any Village	Any Village WwTW		✗	✗	✗	No public sewerage system exists.
Any Hamlet	Any Hamlet WwTW		✓	✓	✓	Catchment flows pumped to Any Town WwTW
Another Village	Another Village WwTW		✓	✓	✓	A project exists within current Business Plan to upgrade this facility

**Key**

- New Connections permitted – Capacity Available
- Restricted Planning – Limited Capacity
- New connections refused – No Capacity
- ✓ Works has 'Reasonable Capacity'
- ⊘ Works is 'At or Reaching Capacity'
- ✗ Works has 'Insufficient Capacity'

The indicators are a combination of Red, Amber and Green (RAG) traffic lights for current capacity and a variety of tick box symbols for future capacity. The distinct formats were adopted to help emphasise the certainty of the current status compared with the more speculative conclusion looking forward. The respective keys explain the relevant implications, information on planned investment for wastewater treatment or other relevant information will appear as a supplementary comment against each listed WWTW. The current capacity for settlements within this District has been provided overleaf.







Settlements Served by Large Wastewater Treatment Works

Wastewater Treatment works	Current Planning Status	Estimation of Capacity based on Growth Factor			Comment
		10%	20%	30%	
Annacloy (WWTW)	■	✓	✓	⊘	
Annalong (WWTW)	■				Query
Ardglass (WWTW)	■	✓	✓	✓	
Ballykinier (WWTW)	■	✓	✓	⊘	
Ballynahinch (Down)	■	✓	✓	✓	
Blackrock Retention Tank (Down)	■				Query
Clough (WWTW)	■	x	x	x	
Coneyisland (WWTW)	■	⊘	⊘	⊘	
Downpatrick (WWTW)	■	✓	✓	✓	
Drumaness (WWTW)	■	⊘	⊘	⊘	
Drumaroad (WWTW)	■	⊘	⊘	x	
Dundrum (Down)	■	✓	✓	✓	Upgrade of this WwTW planned during 2015-2021
Glassdrumman (Down)	■	✓	✓	⊘	
Kilkeel (WWTW)	■	✓	✓	⊘	

Killough (Retention Tank)					Query
Killyleagh (WWTW)		✓	✓	✓	
Lisowan		⊗	x	x	
Loughinisland (WWTW)		x	x	x	
Maghera (Down)		⊗	⊗	x	
Newcastle (WWTW)		✓	✓	⊗	
Saintfield (WWTW)		⊗	x	x	
Strangford		✓	✓	✓	
Thorney Glen		⊗	⊗	⊗	
Annsborough		⊗	x	x	
Attical (WWTW)		✓	✓	✓	
Ballymaderphy		x	x	x	
Bankside Shinn		⊗	⊗	⊗	
Beech Hill South		⊗	⊗	⊗	
Belleek (Armagh)		✓	⊗	⊗	
Cranfield (Down)					Query

Crossmaglen		✓	⊘	⊘	
Cullaville		✓	⊘	⊘	
Cullyhanna (WWTW)		⊘	⊘	x	
Dorsy		⊘	⊘	⊘	
Drumilly		⊘	⊘	⊘	
Drumintee		✓	✓	✓	
Forkhill		✓	✓	✓	
Glassdrumman (Armagh)		x	x	x	
Glen Villas		x	x	x	
Hilltown (WWTW)		⊘	⊘	⊘	
Jonesborough (WWTW)		✓	✓	✓	
Kilcoo		✓	✓	✓	
Killeen (Armagh)		⊘	⊘	⊘	
Leitrim (New)		⊘	⊘	⊘	
Lislea (New)		⊘	⊘	⊘	
Lisnalea		⊘	⊘	⊘	



Lurganare		x	x	x	
McKinley Park		x	x	x	
Meigh (WWTW)		x	x	x	
Mountain View (Drumintee)		⊗	⊗	⊗	
Mullaghglass (Newry)		⊗	⊗	⊗	
Newry (WWTW)		✓	✓	✓	
Newtownhamilton		✓	✓	✓	
Oliver Plunkett Park		x	x	x	
Rathfriland (WWTW)		⊗	x	x	
Silverbridge		⊗	⊗	⊗	
Warrenpoint (WWTW)		⊗	x	x	
<b>Key to Current Planning Status</b>		<b>Key to Local Development Planning</b>			
	New connections permitted - Capacity Available	✓	Works has 'Reasonable Capacity'		
	Restriction on new connections - Capacity Limited	⊗	Works is 'At or reaching Capacity'		
	New connections refused - No Capacity	x	Works has 'Insufficient Capacity'		

