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Plean Forbartha Áitiúla 2035
Dréacht-Straitéis an Phlean
Local Development Plan 2035
Draft Plan Strategy

Aguisín le Dréacht-Tuarascáil ar Scagadh Tionchair Comhionannais

Addendum to Draft Equality Impact Screening Report

October 2026

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

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

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Executive Summary

This addendum to the draft Plan Strategy 'Draft Equality Impact Screening Report', June 2025, is prepared in support of Newry, Mourne and Down District Council's Local Development Plan 2035, and should be read in conjunction with these previously published documents.

All representations received during the formal public consultation period for the draft Plan Strategy, held between Friday 27 June 2025 and Monday 22 September 2025 are available on the Council's website Newry, Mourne and Down District Council Draft Plan Strategy. The Council's response to these representations will be made available on submission of all LDP documents to the Department for Infrastructure to cause an Independent Examination.

The draft Equality Impact Screening Report was published as a supporting document to the draft Plan Strategy for formal consultation in June 2025. Two representations were received in relation to the draft Plan Strategy's draft Equality Impact Screening Report.

After due consideration of all representations received to the draft Plan Strategy, Newry, Mourne and Down District Council, in accordance with the Department for Infrastructure's Development Plan Practice Note (DPPN) 10, December 2019, is recommending a number of focused changes to the published draft Plan Strategy. These can be found within the published consultation document '**Focused Changes Consultation, Draft Plan Strategy, October 2026'**, which accompanies this Addendum.

This Addendum outlines a Schedule of Focused Changes and assesses those proposed focused changes in relation to the EQIA process. It comprises of the following:

- Screening of all proposed changes to policies to identify if further EQIA assessment is required; and
- An assessment of any proposed changes that have not been screened out (where necessary).

The findings are set out in Table 1 within Appendix A of this Addendum.

Following consideration of the proposed focused changes, no implications on the overall draft EQIA have been identified.

This Addendum is being published for public consultation for a period of 8 weeks, which corresponds to the timeframe specified in Development Plan Practice Note 10 'Submitting Development Plan Documents for Independent Examination'.

1.0 Introduction

1.1 The draft Plan Strategy was published for public consultation on 27 June 2025. Part 1 of the draft Plan Strategy contains the LDP Strategic Policies. These are underpinned by a range of Operational Policies, contained within Part 2 of this document.

1.2 The Council received 102 representations to the draft Plan Strategy. Paragraph 4.3 of Development Plan Practice Note Submitting Development Plan Documents for Independent Examination (DPPN 10, December 2019) states that: 'Following receipt of representations to the DPD, the council will consider the issues raised…Ultimately the council will consider each issue raised and determine whether there will be: No Change; Minor Changes; Focused Changes; or Fundamental Changes required to its Plan Strategy'.

1.3 Full consideration of all representations received in relation to the draft Plan Strategy will be detailed in a Public Consultation Report (PCR), which takes account of the main issues raised. This will be published on submission of all documents to the Department for Infrastructure (DfI) in order to cause an Independent Examination.

1.4 Following consideration of all representations received, the Council is proposing a number of focused changes to the published draft Plan Strategy which takes account of the administrative procedures for any proposed change to the draft Plan Strategy, as outlined in DPPN 10.

1.5 Focused changes are presented in the form of a 'Focused Changes' Addendum as indicated in paragraph 4.7 of DPPN 10. In accordance with paragraph 4.5 and 6.8 of DPPN10, as part of a council's submission to the Department, a list of proposed minor changes to the draft Plan Strategy may be submitted that have not been subject to consultation. These changes do not impact upon the soundness of the DPD and do not require public consultation.

1.6 In accordance with paragraph 4.10 of DPPN 10, the Council is publishing the Focused Change addendum and all other statutory assessments, including a Sustainability Appraisal (SA) Addendum, a Draft Habitats Regulations Assessment (HRA) Addendum, a Draft Equality Impact Screening Addendum and a Draft Rural Needs Impact Addendum, for a period of eight weeks as required.

2.0 Statutory Requirements

2.1 The Council has a statutory duty, under Section 75 of the Northern Ireland Act 1998, as 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 the nine equality categories of persons of different religious belief; political opinion; racial group; age; marital status; sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependents and persons without.

2.2 Without prejudice to the above obligations, public authorities are also required to have regard to the desirability of promoting good relations between persons of difference religious belief, political opinion or racial grouping.

2.3 The Council also has a duty under the Disability Discrimination (Northern Ireland) Order 2006 to have due regard of the need to promote positive attitudes toward disabled people and encourage participation of disabled people in public life.

2.4 The Draft Equality Impact Screening Report was published as a supporting document to the draft Plan Strategy for formal consultation in June 2025. Two representations were received in relation to the draft Plan Strategy's RNIA.

3.0 Screening of Focused Changes

3.1 The focused changes relating to policies within the draft Plan Strategy require screening to identify if there are any changes to the initial assumptions made regarding equality impact.

3.2 Each focused change was compared against the original draft EQIA Screening Report in terms of the aim of the policy and its potential impact and influence on equality issues.

3.3 The purpose of screening the focused changes is therefore to consider if they 'materially' change what the EQIA Screening Report previously assessed (i.e. change what actions the LDP might inevitably lead to); and clarify if an updated EQIA is/is not required.

3.4 With this in mind, the initial step is considering the Equality Impact Screening Report and the 'screening' of all the focused changes is to identify any that could have a significant effect on the final outcomes upon the implementation of the Plan Strategy.

3.5 Every focused change has been compared against the draft Plan Strategy policies, and any supporting information, to check if the effect and implementation of that policy has been altered.

3.6 The screening of each of the focused changes is set out in Table 1. The focused changes to text have been identified as follows:

- text that is being removed is shown in ~~red strikethrough~~
- new or amended text is coloured in blue.

4.0 Conclusion

4.1 The proposed focused changes to the draft Plan Strategy do not introduce new policies but provide amendments and clarification to the existing published policies to ensure coherence and consistency, in accordance with such tests as set out in DPPN 6 (Soundness) and DPPN 10 (Submitting DPD Documents for Independent

Examination), to ensure that any impact upon the soundness of the DPD is addressed.

4.2 The aims and objectives of the policies are unaltered, and in reassessing the Equality Impact of the focused changes, the outcomes remain unchanged from those originally identified and considered in the initial EQIA Screening Report.

Appendix A: Table 1- Reassessment of the Equality Impact of Amended Policy

Part 1: Spatial Growth Strategy and Strategic Policies

Focused Change Reference	Policy	Proposed Focused Change	Original EQIA Screening Report	Has the aim of the policy changed?	Reassessment of Equality Impact
FC1	HS1 - Housing Land Allocation	After the first paragraph of policy insert the following paragraph: In order to ensure the housing requirement can be met, the Plan Strategy proposes an indicative strategic housing allocation of 11,722-12,758 units, allowing for a non-implementation allowance. This takes account of completions, existing commitments and includes an allowance for urban capacity and windfall. Amend the penultimate paragraph of policy to reflect the updated percentage for city and towns as follows: Table 7 shows that up to ~~approximately~~ 65% of the total	It is anticipated that the broad location of housing land will cater for all Section 75 groups. Housing will be allocated across the settlement tiers and countryside in broad alignment with the Spatial Growth Strategy. It is considered that the Housing Strategy is likely to have a positive effect generally as it seeks to provide housing to meet the needs of all in the most accessible locations and where the majority of our population are located. This will be of particular benefit to different age and racial groups and those living with disabilities and dependents. No adverse impact on any Section 75 Group.	No	Unchanged

		expected housing delivery over the LDP period is in the city and towns. Amend the Justification and Amplification first paragraph as follows: It will seek to deliver up to ~~approximately 61%~~ 60% of the district's housing within its city and towns over 5,000 population. Amend the Justification and Amplification second paragraph as follows: Table 7 sets out an allocation, before application of a non-implementation allowance, of between ~~12,025~~ 12,285 and ~~12,863~~ 13,436 over the plan period 2020-2035. Amend the Justification and Amplification third paragraph as follows: The ~~2024 Housing R~~review of the Council's evidence base			

		suggested that a non-implementation allowance be applied to the strategic housing allocation ~~(see Technical Supplement 2 – Housing)~~. This has resulted in an adjusted provision of between ~~11,373~~ 11,722 and ~~12,127~~ 12,758 dwellings between 2020 and 2035 (see table 7 ~~7.14 Technical Supplement 2 – Housing~~).			
FC2	Policy HS3 Management of Housing Supply	Replace the fourth paragraph of the Justification and Amplification under subheading Newry City and Towns with the following: ~~Where it is demonstrated that there is insufficient Phase 1 housing land to meet affordable housing needs, and where this is supported by NIHE, consideration will be given to the release of Phase 2 lands.~~ Phase 2 lands are identified in Downpatrick and Ballynahinch. These lands will be released as follows: Downpatrick:	Policy seeks to manage the supply of housing over the Plan period. No adverse impact on any Section 75 Group.	No	Unchanged

		DK07 – if the necessary transportation infrastructure associated with Phase 1 is completed to an appropriate stage. Although some of DK07 supply is counted as Phase 2 for monitoring purposes, there is no restriction on any part of the site coming forward within the Plan period. DK11, DK12 and DK13 – if the necessary transportation infrastructure associated with Phase 1 is complete and there is evidence of a need for additional supply through the five-year supply assessment. <u>Ballynahinch:</u> BH12 and BH14 – if there is a localised housing need identified by the NIHE which cannot be met through Phase 1 sites; or if there are insufficient Phase 1 sites remaining to provide a five-year supply. In line with the Plan, Monitor and Manage approach (SPPS, para 6.140) this will be			

		reviewed further at the LPP stage.			
	Policy HS3 Management of Housing Supply	Amend the Justification and Amplification last paragraph under subheading Newry City and Towns as follows: At LPP stage the identification of all Phase 1 and Phase 2 sites ~~and their reclassification to Phase 1~~ will follow a sequential approach whereby priority is given to those sites which are suitable, available and accessible ~~with greater accessibility to the city and town centres~~ and where necessary infrastructure is in place.	Policy seeks to manage the supply of housing over the Plan period. No adverse impact on any Section 75 Group.	No	Unchanged

Part 2: General Policy and Operational Policies

Focused Change Reference	Policy	Proposed Focused Change	Original EQIA Screening Report	Has the aim of the policy changed?	Reassessment of Equality Impact
FC3	Policy GP1 – General Policy	Policy text, Subheading 5 Historic Environment and Natural Heritage (bullet point 3): Measures to ~~achieve~~ promote biodiversity net gain should be identified at an early stage in	Policy GP1 is the overarching General Policy for the draft Plan Strategy. It is applicable to all development proposals across the district. The policy outlines the necessary assessments required to safeguard the following:	No	Unchanged

		the design process and incorporated into development proposals;	1. Quality of the Environment and Amenity 2. Access, Movement and Parking 3. Safety and Safeguarding of Human Health, Wellbeing and the Environment 4. Landscape, Seascape and Townscape Character 5. Historic Environment and Natural Heritage 6. Infrastructure This policy has the potential to benefit all sections of the community. **No adverse impact on any Section 75 Group.**		
		Justification and Amplification subheading The Historic Environment and Natural Heritage, fifth paragraph: The biodiversity mitigation hierarchy should be used in the design phase to help avoid biodiversity losses, reduce impacts and make it easier to ~~achieve the required amount~~ provide an enhanced level of biodiversity net gain.		No	Unchanged
FC4	Policy HOU7 – Adaptable and Accessible Homes	Policy text, third paragraph: ~~The design~~ A range of dwellings should be provided ~~ensure~~ that ~~they~~ are capable of providing accommodation that is wheelchair accessible for those in society who are mobility impaired. Dwellings should ~~and~~ be in accordance with ~~space standards for~~ wheelchair access standards ~~housing~~ set out in LDP Supplementary Planning Guidance.	Housing in Settlements HOU1-HOU9 Housing in Settlements policies provide opportunities to improve existing house stock (HOU3), change use to residential (HOU4) and develop new housing stock which cater to a wide range of the community (HOU5-HOU9). All residential development must comply with HOU 1 – to create quality residential development. These policies therefore have the potential to benefit all sections of the community, but certain Section 75	No	Unchanged

FC5	HOU8 – Specialist Residential Accommodation	Policy text, second paragraph: New ~~specialised~~ specialist residential ~~housing~~ accommodation should be located within the settlement limits unless it is clearly demonstrated that a countryside location is necessary to serve an identified need, subject to the sequential test.	groups may experience particular benefits – racial group, age, marital status, disability, dependency. **No adverse impact on any Section 75 Group.**	No	Unchanged
		After the second paragraph of policy insert the following paragraph: In circumstances where a countryside location is considered acceptable, such proposals will be assessed on their merits and will be subject to the following sequential test: a) Land adjacent to an existing settlement limit, subject to amenity and environmental considerations; b) A site close to a settlement limit which currently contains buildings or where the site is already in a			

		degraded or derelict state and there is an opportunity to improve the environment; c) An undeveloped site in close proximity to a settlement where the development could be visually integrated into the landscape.			
		At the beginning of the fifth paragraph of Justification and Amplification insert the following text: Specialist residential accommodation should be located in settlements unless it is demonstrated that there is an identified need for the facility within the countryside, subject to the sequential test. The location of housing intended for people with specialist housing needs will need careful consideration as not all sites will be suitable, for example, certain physical characteristics such as steep slopes may not be viable or provide ease of access. (cont.)		No	Unchanged

FC6	CF1 – Community Facilities	After the first paragraph of policy insert the following paragraph: In circumstances where a countryside location is considered acceptable, such proposals will be assessed on their merits and will be subject to the following sequential test: a) Land adjacent to an existing settlement limit, subject to amenity and environmental considerations; b) A site close to a settlement limit which currently contains buildings or where the site is already in a degraded or derelict state and there is an opportunity to improve the environment; c) An undeveloped site in close proximity to a settlement where the development could be visually integrated into the landscape.	Health, Education and Community Facilities CF1 Health, Education and Community Facilities have the potential to reduce social, educational and health inequalities. This policy therefore has the potential to benefit all sections of the community, but certain Section 75 groups may experience particular benefits – racial group, age, sexual orientation, disability, dependency. **No adverse impact on any Section 75 Group.**	No	Unchanged
FC7	RET4 – Retail Development Outside City and Town Centres	Policy text, first paragraph: Planning permission may be granted outside city and town centres, but within the settlement limit, for a ~~small~~	Town Centres and Retailing The aim of this policy grouping is to provide a hierarchy of development that supports the growth of the city and town centres. There is	No	Unchanged

		~~scale~~ convenience shop of an appropriate scale, ~~which does not exceed 200 square metres gross external area,~~ where it can be demonstrated that: a) It meets a defined local need which cannot be met within an existing centre; and b) It will not adversely affect the vitality and viability of existing centres within its catchment.	a town centre first approach. Such areas are readily accessible to all, including those who are dependents on public transport. This approach is considered as beneficial to the wider population, both urban and rural dwellers. **No adverse impact on any Section 75 Group.**		
		Policy text, second paragraph: Within the settlement limit, p~~P~~roposals for a convenience ~~retail facility~~ shop of an appropriate scale at a roadside service facility ~~which exceed 200 square metres gross external area~~ may be permitted where they meet the above requirements and can demonstrate no significant detrimental impact on existing centres. In accordance with Policy RET3, applications may require ~~through~~ the submission of a Retail Impact Assessment or Assessment of Need.		No	Unchanged

FC8	RET7 – Retail Development in the Countryside	Policy text, second paragraph: Proposals for such facilities should ~~normally~~ be located within existing buildings.		No	Unchanged
FC9	TOU3 – Hotels, Guest Houses, B&Bs, Tourist Hostels and Bunkhouses in the Countryside	Policy text, second paragraph: A proposal for a new hotel in the countryside must demonstrate an ~~substantial~~ exceptional benefit to tourism as well as sustainable benefits to the locality.	Tourism Development in the Countryside TOU2-TOU7 Tourism policies aim to support tourism, leisure and cultural development in both our settlements and rural areas. **No adverse impact on any Section 75 Group.**	No	Unchanged
FC10	MIN2	Policy text, third paragraph: Subject to Policy MIN1, a proposal for mineral development within a designated Area of Constraint on Mineral Development (other than those considered valuable) may be granted planning permission when ~~either~~ any of the following exceptional circumstances apply: a) For minor expansion of an existing mineral working; or b) Where the mineral is of limited occurrence in Northern Ireland and there is no reasonable alternative source	Minerals Development MIN1-MIN7 The aim of these policies is to secure a balanced and sustainable approach, that takes account of the need for minerals to support development and the need to protect the environment. This policy has the potential to benefit all sections of the community and therefore is unlikely to have a significant impact on any particular group. **No adverse impact on any Section 75 Group.**	No	Unchanged

		outside the Area of Constraint on Mineral Development; or c) The proposed operations are short-term and the environmental and amenity implications are not significant.			
FC11	TCU1 – Control of Telecommunications Development	Third paragraph of policy change 'considered' to 'permitted' and insert new paragraph as follows: Proposals for telecommunications development will not normally be ~~considered~~ permitted in Special Countryside Areas (SCA). However, where they are submitted, they will be required to meet the provisions of Policy LA1. Proposals for telecommunications development should also avoid flood prone areas and consider alternative sites first. Where considered necessary for operational reasons, proposals within flood plains will be required to meet the provisions of Policy FRD1.	Telecommunications and Other Utilities TCU 1-3 The aim of these policies is to facilitate appropriate telecommunication and other utility development. **No adverse impact on any Section 75 Group.**	No	Unchanged

FC12	WM2 – Waste Collection and Treatment Facilities	Insert additional bullet point at end of criteria b in policy as follows: The proposal avoids (as far as is practicable) the permanent loss of the best and most versatile agricultural land.	Waste WM1-5 The aim of these policies ensures the sustainable management of waste. This can reduce adverse impacts on the environment and protect the health of all in society. **No adverse impact on any Section 75 Group.**	No	Unchanged
FC13	RE1 – Renewable and Low Carbon Energy	Policy text, under subheading Wind Energy, second paragraph: For ~~all~~ wind ~~turbines~~ farm development (comprising more than two turbines) separation distances will be assessed on a case-by-case basis with a minimum separation distance to occupied property ~~of 10 times rotor diameter to any sensitive receptor, with a minimum distance of~~ not less than 500m, ~~for wind farms (defined as two or more turbines) will~~ generally applying. A case-by-case approach will apply to all other wind turbine development.	Renewable Energy RE1-2 The aim of these policies is to facilitate appropriate renewable energy proposals. **No adverse impact on any Section 75 Group.**	No	Unchanged

Appendix B: Original EQIA Screening Report, June 2025

Focused Change	Strategic/ Operational Policy	Religious Belief	Political Opinion	Racial Group	Age	Marital Status	Sexual Orientation	Gender	Disability	Dependency	Comments – nature of policies and likely impact on the S-75 Groups
FC1	**Strategic Policy HS1**	X	X	X	X	X	X	X	X	X	Policy aligns with the Spatial Growth Strategy and Settlement Hierarchy. It is anticipated that the broad location of housing land will cater for all Section 75 groups. Housing will be allocated across the settlement tiers and countryside in broad alignment with the Spatial Growth Strategy. It is considered that the Housing Strategy is likely to have a positive effect generally as it seeks to provide housing to meet the needs of all in the most accessible locations and where the majority of our population are located. This will be of particular benefit to different age and racial groups and those living with disabilities and dependents. **No adverse impact on any Section 75 Group.**
FC2	**Strategic Policy HS3**	X	X	X	X	X	X	X	X	X	Policy seeks to manage the supply of housing over the Plan period. **No adverse impact on any Section 75 Group.**
FC3	**General Policy GP1***	X	X	X	X	X	X	X	X	X	GP1 is the overarching General Policy for the draft Plan Strategy. It is applicable to all development proposals across the district. The policy outlines the necessary assessments required to safeguard the following:

											1. Quality of the Environment and Amenity 2. Access, Movement and Parking 3. Safety and Safeguarding of Human Health, Wellbeing and the Environment 4. Landscape, Seascape and Townscape Character 5. Historic Environment and Natural Heritage 6. Infrastructure This policy has the potential to benefit all sections of the community. *Policy GP1 had been screened out; however, due to a technical issue, its screening assessment was omitted from the original EQIA Screening Report. **No adverse impact on any Section 75 Group.**
FC4	**Policy HOU7**	X	X	+	+	+	X	X	+	+	Housing in Settlements policies provide opportunities to improve existing house stock (HOU3), change use to residential (HOU4) and develop new housing stock which cater to a wide range of the community (HOU5-HOU9). All residential development must comply with HOU 1 – to create quality residential development. These policies therefore have the potential to benefit all sections of the community, but certain Section 75 groups may experience particular benefits – racial group, age, marital status, disability, dependency. **No adverse impact on any Section 75 Group.**

FC5	**Policy HOU8**	X	X	+	+	+	X	X	+	+	Housing in Settlements policies provide opportunities to improve existing house stock (HOU3), change use to residential (HOU4) and develop new housing stock which cater to a wide range of the community (HOU5-HOU9). All residential development must comply with HOU 1 – to create quality residential development. These policies therefore have the potential to benefit all sections of the community, but certain Section 75 groups may experience particular benefits – racial group, age, marital status, disability, dependency. **No adverse impact on any Section 75 Group.**
FC6	**Policy CF1**	X	X	+	+	X	+	X	+	+	Health, Education and Community Facilities have the potential to reduce social, educational and health inequalities. This policy therefore has the potential to benefit all sections of the community, but certain Section 75 groups may experience particular benefits – racial group, age, sexual orientation, disability, dependency. **No adverse impact on any Section 75 Group.**
FC7	**Policy RET4**	X	X	X	X	X	X	X	X	X	The aim of this policy grouping is to provide a hierarchy of development that supports the growth of the city and town centres. There is a town centre first approach. Such areas are readily accessible to all, including those who are dependents on public transport. This approach is

											considered as beneficial to the wider population, both urban and rural dwellers.
FC8	**Policy RET7**	X	X	X	X	X	X	X	X	X	The aim of this policy grouping is to provide a hierarchy of development that supports the growth of the city and town centres. There is a town centre first approach. Such areas are readily accessible to all, including those who are dependents on public transport. This approach is considered as beneficial to the wider population, both urban and rural dwellers.
FC9	**Policy TOU3**	X	X	X	X	X	X	X	X	X	Tourism policies aim to support tourism, leisure and cultural development in both our settlements and rural areas. **No adverse impact on any Section 75 Group.**
FC10	**Policy MIN2**	X	X	X	X	X	X	X	X	X	The aim of these policies is to secure a balanced and sustainable approach, that takes account of the need for minerals to support development and the need to protect the environment. This policy has the potential to benefit all sections of the community and therefore is unlikely to have a significant impact on any particular group. **No adverse impact on any Section 75 Group.**
FC11	**Policy TCU1**	X	X	X	X	X	X	X	X	X	The aim of these policies is to facilitate appropriate telecommunication and other utility development. **No adverse impact on any Section 75 Group.**

FC12	**Policy WM2**	X	X	X	X	X	X	X	X	X	The aim of these policies ensures the sustainable management of waste. This can reduce adverse impacts on the environment and protect the health of all in society. **No adverse impact on any Section 75 Group.**
FC13	**Policy RE1**	X	X	X	X	X	X	X	X	X	The aim of these policies is to facilitate appropriate renewable energy proposals. **No adverse impact on any Section 75 Group.**

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