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

Aguisín le Dréacht-Mheasúnacht Tionchair ar Riachtanais na Tuaithe

Addendum to Draft Rural Needs Impact Assessment

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 Rural Needs Impact Assessment (RNIA), June 2025, is prepared in support of Newry, Mourne and Down District Council's Local Development Plan (LDP) 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 Rural Needs Impact Assessment Report (RNIA) was published as a supporting document to the draft Plan Strategy for formal consultation in June 2025. Six representations were received in relation to the draft Plan Strategy's Rural Needs Impact Assessment 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'**.

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

- screening of all proposed changes to policies to identify if further RNIA assessment is required; and, if necessary,
- 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 RNIA have been identified.

The Addendum is being published for public consultation for a period of eight 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 10 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 Addendum and a Draft Rural Needs Impact Addendum, for a period of eight weeks as required.

2.0 Statutory Requirements

2.1 The Rural Needs Act 2016 requires district councils and other public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. The principles of rural proofing are incorporated into the Rural Needs Impact Assessment (RNIA) process.

2.2 The purpose of the Act is to ensure that public authorities have due regard to the social and economic needs of people in rural areas when carrying out certain

activities and to provide a mechanism for ensuring transparency in relation to how public authorities consider rural needs when undertaking these activities.

2.3 The RNIA was published as a supporting document to the draft Plan Strategy for formal consultation in June 2025. Six 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 assessment regarding rural impact.

3.2 Each focused change was assessed against the original RNIA in terms of the aim of the policy, and its potential impact and influence on the rural area and rural needs.

3.3 The purpose of screening the focused changes is to consider if they 'materially' change the original RNIA, (i.e. change what actions the LDP might inevitably lead to) and to clarify if an updated RNIA is/is not required.

3.5 With this in mind, the initial step is considering the draft RNIA 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.

3.6 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.

3.7 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 any new policies but provide amendments and clarification to the existing published policies to ensure coherence and consistency, in accordance with tests as set out in Development Plan Practice Note 6 (Soundness) and Development Plan Practice Note 10 (Submitted DPD Documents for IE) 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 Rural Needs Impact of the focused changes, the outcomes remain unchanged from those originally identified and considered in the initial RNIA.

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

Part 1: Spatial Growth Strategy and Strategic Policies

Focused Change Reference	Policy	Proposed Focused Change	Original RNIA Screening Report	Has the aim of the policy changed?	Reassessment of Impact on Rural Needs
FC1	Policy HS1	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:	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.	No	Unchanged

		Table 7 shows that up to ~~approximately~~ 65% of the total 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	Replace the fourth paragraph of the Justification and Amplification under subheading Newry City and Towns with the following:	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report).	No	Unchanged

		~~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: <u>Downpatrick:</u> 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	However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.		

		through the five-year supply assessment. Ballynahinch: 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 across the district 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.			
		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.			
FC3	Policy GP1	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 the design process and incorporated into development proposals;	The General Policy GP1 applies to all new developments and seeks to ensure that proposals are designed so 9 they will not cause demonstrable harm to any of the criteria set out within the Policy. The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will	No	Unchanged

			offset the negative impacts.		
		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	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.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment	No	Unchanged

			opportunities that will offset the negative impacts.		
FC5	Policy HOU8	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.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.	No	Unchanged
	Policy HOU8	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		No	Unchanged

		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.			
	Policy HOU8	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		No	Unchanged

		the sequential test. The location of housing intended for people with specialist housing needs will need careful consideration…			
FC6	Policy CF1	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;	The significant rural population in turn means that infrastructure, both in terms of transport and community facilities, such as playing fields and schools are needed to be provided in rural settlements and areas to accommodate the demands of the population. The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable	No	Unchanged

		c) An undeveloped site in close proximity to a settlement where the development could be visually integrated into the landscape.	development of rural areas, providing housing and employment opportunities that will offset the negative impacts.		
FC7	Policy RET4	Policy text, first paragraph: Planning permission may be granted outside city and town centres, but within the settlement limit, for a ~~small-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.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.	No	Unchanged
	Policy RET4	Policy text, second paragraph:		No	Unchanged

		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.			
FC8	Policy RET7	Policy text, second paragraph: Proposals for such facilities should ~~normally~~ be located within existing buildings.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural	No	Unchanged

			areas, providing housing and employment opportunities that will offset the negative impacts.		
FC9	Policy TOU3	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.	The tourism policies seek to encourage the development of sustainable tourism and introduce new policies to ensure tourism development can be managed appropriately. The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will	No	Unchanged

			offset the negative impacts.		
FC10	Policy 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 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.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.	No	Unchanged
FC11	Policy TCU1	Third paragraph of policy change 'considered' to	Opportunities for economic	No	Unchanged

		'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.	development must also be provided and in turn this requires supporting infrastructure in terms of telecommunications and energy requirements. The draft Plan Strategy seeks to provide these opportunities, in appropriate locations, while also preserving the distinctive character of the countryside. The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment		

			opportunities that will offset the negative impacts.		
FC12	Policy WM2	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.	The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.	No	Unchanged
FC13	Policy RE1	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	The draft strategic and operational policies seek to encourage the development of such projects to contribute towards the achievement of Net Zero while preserving the character of rural	No	Unchanged

		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.	areas and landscapes. The harnessing of a significant level of renewable energy has the potential to allow rural communities to source a significant amount of their energy needs from local sources and is considered a significant positive. The policies set out in the draft Plan Strategy will impact on people in rural areas in the ways described (see original RNIA report). However, the overall aim and objective of the LDP is to promote the sustainable development of rural areas, providing housing and employment opportunities that will offset the negative impacts.		

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