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

Aguisín le Tuairisc an Bhreithmheasa Inbhuanaitheachta (a chuimsíonn Measúnú Straitéiseach Comhshaoil)

Addendum to Sustainability Appraisal Report (Incorporating Strategic Environmental 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

Sustainability Appraisal Addendum

The following data sources have been updated following publication of the draft Plan Strategy.

Sustainability Appraisal Scoping Report

Coastal Flooding and Erosion (page 113)

Please note: The Northern Ireland Coastal Observatory provides datasets and evidence to provide a key baseline that local councils can use to help identify risk for their coastal areas. It is intended that this data and any subsequent data produced by DAERA will be utilised in the preparation of the Local Policies Plan (LPP) to help identify areas at risk from coastal erosion, in line with the requirements of the SPPS para 6.46.

Economically Significant Aquatic Species – Shellfish (page 123):

Please note: Environmental Statistics report has published figures up to 2025 https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2025

Contents

Non-Technical Summary 3

1.0 Introduction 4

2.0 Statutory Requirements 5

3.0 Screening of Focused Changes 5

4.0 Detailed Assessment of Focused Changes 18

5.0 Conclusions and Recommendations 22

Non-Technical Summary

This addendum to the draft Plan Strategy's 'Sustainability Appraisal Report' (SA), 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 www.newrymournedown.org/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 Sustainability Appraisal Report was published as a supporting document to the draft Plan Strategy for formal consultation in June 2025. Eight representations were received in relation to the draft Plan Strategy's Sustainability Appraisal 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 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 SA process. It comprises of the following:

- A screening of all proposed changes to policies to assess if they alter the 'likely significant effects' predicted in the already published SA Report (June 2025), or if they may lead to any new or additional potential significant effects.

The detailed findings are set out in Appendix A of this addendum.

Following consideration of the proposed focused changes, it has been concluded that all the proposed changes to the draft Plan Strategy can be screened out of requiring further Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA), on the basis of having no potential for significant negative impacts on the Sustainability Objectives.

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

1.0 Introduction

1.0 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. This 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. 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.

1.7 The proposed focused changes require consideration by SA and SEA in order to check if they alter the 'likely significant effects' predicted in the already published SA Report accompanying the draft Plan Strategy, or if they may lead to any new additional potential significant effects.

1.8 This Addendum to the SA Report (June 2025) identifies whether the outcomes of that original report should be varied or revised, based on assessment of the focused changes identified in the schedule. If any change is considered to result in a variation of the original assessment, this Addendum will specify where and how this will be reflected in the SA. This Addendum and any outcomes should be read in conjunction with the SA Report (June 2025).

1.9 This Addendum includes the following:

- Screening of all proposed focused changes to policy to consider if any 'materially' change (i.e. change what actions the LDP might inevitably lead to); what the SA initially assessed or assumed about how the LDP would be implemented;
- An examination of the proposed focused changes which might have an effect on the policy's performance against the Sustainability Objectives and assessment of whether the changes would necessitate a revision to the SA; and
- Conclusions and recommendations.

2.0 Statutory Requirements

2.1 The Planning Act (Northern Ireland) 2011, Sections 8(6) and 9(7) requires an appraisal of sustainability to be carried out for the Plan Strategy. A SA must cover social and economic effects of the LDP, as well as any environmental effects by complying with EU SEA Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (SEA Directive).

2.2 The SEA Directive is transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP(NI) Regulations). The EAPP (NI) Regulations set more detailed requirements for the process and content of the environmental assessment of plans and development.

3.0 Screening of Focused Changes

3.1 The proposed focused changes to the draft Plan Strategy have the potential to change the assessment of likely effects on social, economic and environmental interests. Some of the focused changes (insertions, deletions and amendments) alter the wording of policies or the subsequent justification and amplification which provides policy clarification and implementation of that policy.

3.2 If a focused change causes an impact on the policies of the dPS, then that impact must be assessed. With this in mind, the initial step is considering the SA and the 'screening' of the proposed focused changes to identify whether these modifications would alter any of the conclusions previously reached in the SA Report and could therefore be likely to have significant effects on the environment as a result of the implementation of the Plan Strategy.

3.3 Every focused change has been compared against the published draft Plan Strategy policies and its supporting information to check whether or not the intent or implementation of that policy has been altered. This comparison will identify whether the proposed changes alter any of the conclusions previously reached in the SA Report and would therefore be likely to have significant effects on the environment as a result of implementing the dPS with the changes proposed. The screening of the proposed 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.

Table 1: Screening of Proposed Focused Changes

Part 1: Spatial Growth Strategy and Strategic Policies

Focused Change Reference	Policy	Proposed Focused Change	Predicted Impact on the SOs from applying the change(s)	Reason	Conclusion
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 expected housing delivery over	No change / neutral as the figures have been corrected in line with updated housing monitor data and this has no predicted impact on the SO relating to the delivery of housing provision over the plan period.	To provide clarity in relation to the difference between the housing requirement of 11,000 units and the actual total allocation (11,722 - 12,758).	Screened Out

		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: 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	No change / neutral as the figures have been corrected in line with updated housing monitor data and revision to housing allocation (as set out in Addendum 1 - Review of Housing Strategy (Lichfields, September 2026) to Technical Supplement 2, Appendix 2B Review of Housing Strategy (Lichfields, March 2025) and this has no predicted impact on the SO relating to the delivery of housing provision over the plan period.	To provide clarity in respect of phasing in the Council's towns of Downpatrick and Ballynahinch.	Screened Out

		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~~	No change / neutral as this provides clarification on two stage process and further identification of housing land at the LPP stage. This has no predicted impact on the	To provide clarity on the two stage LDP stages.	Screened Out

		~~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.	SO relating to the delivery of housing provision over the plan period.		

Part 2: General Policy and Operational Policies

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;	No change/neutral	For clarification: intention of policy is to support the delivery of biodiversity net gain; it does not apply a particular percentage net gain.	Screened Out
		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~~	No change/neutral	To avoid policy being overly prescriptive.	Screened Out

		provide an enhanced level of biodiversity net gain.			
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.	No change/neutral	To provide clarification and avoid policy being overly prescriptive.	Screened Out
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.	No change/neutral	To provide clarification that the policy applies to all specialist accommodation, including shared accommodation and shared housing.	Screened Out
	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	Slight enhancement of positive effect for SO3 'provide good quality sustainable housing' however no overall change.	The addition ensures there will be a sequential approach to provision – this amendment better	Screened Out

		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.		supports the policy objectives.	
	HOU8 – Specialist Residential Accommodation	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	Slight enhancement of positive effect for SO3 'provide good quality sustainable housing' however no overall change.	This addition acknowledges that a countryside location for specialist accommodation is subject to the above sequential test.	Screened out

		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.)			
FC6	Policy 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	Slight enhancement of positive effect for SO2 'strengthen society' however no overall change.	The addition ensures there will be a sequential approach to provision – this amendment better supports the policy objectives.	Screened Out

		the development could be visually integrated into the landscape.			
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.	No change / neutral as whilst the policy has been amended to remove the threshold this has no predicted impact on the SO relating to the vitality and viability of existing centres.	Amendment to better reflect the thresholds for retail impact assessment and assessment of need and impact test as set out under Policy RET3.	Screened Out
	RET4 – Retail Development Outside City and Town Centres	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	No change / neutral as whilst the policy has been amended to remove the threshold this has no predicted impact on the SO relating to the vitality and viability of existing centres.	Amendment to better reflect the thresholds for retail impact assessment and assessment of need and impact test as set out under Policy RET3.	Screened Out

		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.	No change/neutral	To align the policy with the SPPS.	Screened Out
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.	No change/neutral	To align the policy with the SPPS.	Screened Out
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	No change/neutral	To provide clarification in relation to the exceptions to this policy.	Screened Out

		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.			
FC11	Policy TCU1	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.	No change/neutral	To provide clarification and limit the probability of service being interrupted in the event of a flood.	Screened Out

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.	No change/neutral	To include a reference to avoid the permanent loss of the best and most versatile agricultural land (as far as practicable). The objectives of the policy remain unaffected by the changes. No further SA is required.	Screened Out
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 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.	No change/neutral	To ensure policy aligns with new policy requirements of SPPS (Edition 2, published December 2025).	Screened Out

4.0 Detailed Assessment of Focused Changes

4.1 For completeness and transparency, all of the proposed changes have been examined against the Sustainability Objectives (SOs). These are set out in the tables provided in Appendix A.

4.2 This assessment has been carried out in line with the SA Framework as a means of ensuring that the social, environmental and economic needs of the area have been considered in plan preparation. It enables the effects of plan proposals to be described, analysed and compared. It also helps identify measures to minimise negative effects and enhance positive effects. The SA Framework consists of Sustainability Objectives with prompts which assess plan proposals against a baseline.

4.3 A total of 14 social, economic and environmental Sustainability Objectives have been identified in the SA Scoping Report. These have been informed by the strategic and policy context, a review of baseline information for the Council area and any evidence of trends and issues.

4.4 The scoring and description of how the assessment is made is presented below:

Rating		Description
++	**Significant positive**	Policy or proposal would greatly help to achieve the objective.
+	**Minor positive**	Policy or proposal would slightly help to achieve the objective.
0	**Neutral / no effect**	Policy or proposal would have no overall effect.
–	**Minor negative**	Policy or proposal would slightly conflict with the objective.
––	**Significant negative**	Policy or proposal would greatly conflict with the objective.
?	**Uncertain**	The effect cannot be predicted because the approach has an uncertain relationship to the objective; the relationship depends on how the approach is implemented; or insufficient information may be available to enable an appraisal to be made.
ST	**Short term**	Up to five years.
MT	**Medium term**	Five to 15 years.
LT	**Long term**	Over 15 years.

Key:	++ Significant positive	+ Minor positive	0 No overall effect	- Neutral / no effect	-- Significant negative	? Uncertain

4.5 The figures shown in the following section summarise the predicted long-term effects of the policy implementation. It should be noted that short and medium-term effects were also considered in the SA and, where relevant, these have been described in the detailed appraisal comments in Appendix 4 of the SA Report.

The 14 Sustainability Objectives for sustainable development for Newry, Mourne and Down District Council are to:

1…improve health and well-being.

Public policy seeks to increase healthy life expectancy, reduce preventable deaths, improve mental health and reduce health inequalities. Evidence shows that there is a need to address obesity, increase physical activity and reduce inequalities in health. It is also necessary to provide for the needs of an ageing population and minimise the detrimental impacts of noise. This can be achieved by creating an environment that is clean and attractive; encourages healthy lifestyles, protects tranquil and quiet areas, and enables access to health care facilities for all.

2…strengthen society.

Regional policy is directed towards improving community relations and creating a safe society which is more united. Success will be represented by places which are inclusive, respect culture and identity, promote social integration and create a sense of pride. They will also be designed to feel safe and to reduce opportunity for crime or anti-social behaviour.

3…provide good quality, sustainable housing.

The population is growing and therefore there is ongoing need for new housing in locations that meet regional policy, are accessible and balance the needs of society and the environment. The make-up of households is changing; therefore design needs to meet long-term requirements with good quality build to be sustainable. This objective should reduce homelessness and ensure decent, affordable homes with a mix of types.

4…enable access to high quality education.

Good education improves opportunities for employment and contributes to the avoidance of poverty and to healthier lifestyles. The provision of suitable accommodation for educational establishments in appropriate, accessible locations should play a part in making them more sustainable and reducing inequalities in education.

5…enable sustainable economic growth.

Regional policy seeks to develop a strong, competitive and regionally balanced economy. It is necessary to provide suitable locations for employment, with flexibility where necessary, to reflect current and future distribution of jobs across sectors, encourage new business start-ups, facilitate innovation, regenerate areas, attract investment and make employment as accessible as possible for all. This will reduce unemployment and poverty by helping more people to earn a living and to increase their income.

6…manage material assets sustainably.

Material assets such as infrastructure and sources of energy production are essential for society and the economy but need careful planning to ensure that they are designed for efficiency and to minimise adverse impacts. The concept of the circular economy treats waste as resource which should be managed sustainably to reduce production and increase recovery, recycling and composting rates. New or adapted facilities may be required.

7…protect physical resources and use sustainably.

Land, minerals, geothermal energy and soil are resources which require protection from degradation and safeguarding for future use. Sustainable agriculture, sustainable tourism and sustainable use of minerals and geothermal energy can help to support the economy.

8…encourage active and sustainable travel.

There is a common goal to reduce traffic emissions and congestion, which means reducing single occupancy car use and increasing use of other forms of transport, especially at peak times. The location of housing and key services can facilitate better access to public transport. Opportunities for active travel make travel more affordable and may bring added health benefits, while also reducing greenhouse gas emissions. Measures to manage car demand, such as parking and re-allocation of roadspace, which encourage a shift from car to public transport, walking and cycling will contribute to this goal.

9…improve air quality.

Air pollution has serious impacts on human health as well as degrading the natural environment. This objective can be achieved through reducing sources of air pollution. Where air pollution cannot be totally excluded, careful siting of development should avoid impacts on sensitive receptors.

10…reduce causes of and adapt to climate change.

International commitments require greenhouse gas emissions to be reduced to decrease their effects on climate. Measures that help reduce energy consumption and enable renewable energy help mitigate greenhouse gas emissions, however, climate change adaptation planning and implementation is essential to managing the resilience of our society and natural environment to an uncertain future, as well as for the known current and projected impacts of a changing climate.

11…protect, manage and use water resources sustainably.

This objective encompasses reducing levels of water pollution, sustainable use of water resources, improving the physical state of the water environment and reducing the risk of flooding, now and in the future. It meets the requirements of Northern Ireland legislation, strategies and plans in support of the Water Environment (under the Water Framework Directive Regulations) and other legislation that relates to water and it takes account of the future impacts of climate change.

12…protect natural resources and enhance biodiversity.

International obligations which are adopted in Northern Ireland legislation, along with national legislation and policies, require the protection of biodiversity including flora, fauna and habitats. This is for their intrinsic value and for the wider services that they provide to people, the economy and the environment - for example, as carbon stores which can mitigate the effects of climate change. This objective includes protecting and enhancing biodiversity including in coastal and marine areas, as well as protection of green and blue infrastructure to enhance the services that natural resources provide.

13…maintain and enhance landscape character.

International and national policies seek to conserve the natural character and landscape of the coast and countryside and protect them from excessive, inappropriate or obtrusive development. This objective seeks to maintain the character and distinctiveness of the area's landscapes and seascapes and to protect and enhance open spaces and the setting of prominent features, settlements and transport corridors.

14…protect, conserve and enhance the historic environment and cultural heritage.

The historic environment and cultural heritage are resources that inform our history and bring character and sense of place. They also attract visitors and contribute to the economy and bring vibrancy to the places where we live, work and relax. This can be achieved by protecting and enhancing Conservation Areas, townscapes and other sites of historic and cultural value, including their setting.

5.0 Conclusions and Recommendations

5.1 This document has examined the proposed focused changes to the Newry, Mourne and Down District Council LDP 2035 – Draft Plan Strategy. It is an addendum to the Sustainability Appraisal Report (Incorporating Strategic Environmental Assessment), June 2025.

5.2 It should be read in conjunction with the above-mentioned document, the Sustainability Appraisal – Interim Report (incorporating Strategic Environmental Assessment) for the Preferred Options Paper, the Draft Plan Strategy and the Draft Habitats Regulation Assessment Report.

5.3 The screening found that all of the proposed focused changes would not 'materially' change what the SA initially assessed, or what it assumed about how the LDP would be implemented.

FC1 HS1 - Housing Land Allocation J&A of HS1	The Council has updated the strategic housing allocation to take account of the passage of time since publication of the draft Plan Strategy. Table 7 has been amended in its entirety to take account of updated 2025 housing monitor information. The revised table now includes figures before and after application of the 10% non-implementation allowance. Having considered the representations on the level of housing provision in Newcastle, its allocation has been uplifted to that shown in the amended Table 7. The uplift to Newcastle to further address housing need in the local area is considered to be in line with the LDP Housing Strategy with the majority of growth focused in the district's city and towns. Further review will be carried out at LPP Stage. The reduction in anticipated deliverability in Phase 1 sites as set out in Table 7 reflects a more realistic assessment of likely deliverability rates within the remaining plan period. An adjustment to the level of housing allocation between Phase 1 and Phase 2 lands in Downpatrick has been applied following consideration of representations and further work on deliverability (see FC2). **Further detail is set out in Addendum 1 - Housing Strategy (Lichfields, September 2026) to Technical Supplement 2, Appendix 2B Review of Housing Strategy (Lichfields, March 2025).**

	1.... improve health and well-being.	2.... strengthen society.	3.... provide good quality, sustainable housing.	4.... enable access to high quality education.	5.... enable sustainable economic growth.	6.... manage material assets sustainably.	7.... protect physical resources and use sustainably.	8.... encourage active and sustainable travel.	9.... improve air quality.	10.... reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	++	+	+	+	+	+	-	+	+	+	+	+
Revised Assessment	++	++	++	+	+	+	+	+	-	+	+	+	+	+
Expected outcome of implementing the change														

FC2 Page 86 Policy HS3 J&A	The Council has further considered the position regarding phasing of housing lands within the draft Plan Strategy. Addendum 1 - Housing Strategy (Lichfields, September 2026) highlights that the issue in relation to strategic Phase 2 sites is principally one of timing rather than fundamental deliverability or suitability for development. It states that the achievement of the identified housing target is not contingent on these sites. Although they may come forward during this Plan period, they are not expected to come forward in full and are not relied upon to meet the identified housing target. Although some of DK07 housing 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. **Further detail is set out in Addendum 1 - Housing Strategy (Lichfields, September 2026) to Technical Supplement 2, Appendix 2B Review of Housing Strategy (Lichfields, March 2025).**
Page 87	The Council considers that the appropriate stage for consideration of the suitability, availability and deliverability of Phase 1 and Phase 2 lands is at LPP stage. **Further detail is set out in Addendum 1 – Housing Strategy (Lichfields, September 2026) to Technical Supplement 2, Appendix 2B Review of Housing Strategy (Lichfields, March 2025).**

	1.... improve health and well-being.	2.....strengthen society.	3....provide good quality, sustainable housing.	4....enable access to high quality education.	5....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14....protect, conserve and enhance the historic environment.
Original Assessment	++	++	++	+	+	+	+	+	-	+	+	+	+	+
Revised Assessment	++	++	++	+	+	+	+	+	-	+	+	+	+	+
Expected outcome of implementing the change														

FC3 Policy GP1 Page 158 Page 164	The Council has considered the representations received and agrees with the respondents that the intention of the policy is to support the delivery of biodiversity net gain (bng). The policy does not require a particular percentage of bng to be achieved. Wording has been revised to make it clear that the policy seeks to promote rather than achieve. Updated policy wording the Council will for clarity amend the J&A as indicated

	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	+	+	+	0	0	0	0	+	+	0	++	+	+	+
Revised Assessment	+	+	+	0	0	0	0	+	+	0	++	+	+	+
Expected outcome of implementing the change														

FC4 Policy HOU7				The Council acknowledges that Policy HOU7 is intended to be flexible and provide for a range of dwellings suitable for all needs in society. To avoid being overly prescriptive, the Council will amend the wording under paragraph 3 of Policy HOU7 as indicated.										
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	++	0	+	0	0	0	0	0	0	0	0	0
Revised Assessment	++	++	++	0	+	0	0	0	0	0	0	0	0	0
Expected outcome of implementing the change														

FC5 Policy HOU8 – Page 184 Policy text, second paragraph	The Council acknowledges the different terms used in the policy and can confirm the policy applies to all specialist accommodation including shared accommodation and shared housing. The second paragraph of Policy HOU8 will be amended as indicated to provide greater clarity. The Council agrees with the Department that a countryside location should be subject to the application of a sequential test. Additional wording has been inserted.
Policy HOU8 – Page 184 Policy text, second paragraph	The Council agrees with Department that a countryside location should be subject to the application of a sequential test. Additional wording has been inserted.
Policy HOU8 – Page 184 Policy text, second paragraph	The Council agrees with Department that a countryside location should be subject to the application of a sequential test. Additional wording has been inserted.
Policy HOU8 – Page 184 Justification and amplification, fifth paragraph	In order to align with the updated policy wording the Council will for clarity amend the J&A as indicated.

	1.... improve health and well-being.	2.... strengthen society.	3.... provide good quality, sustainable housing.	4.... enable access to high quality education.	5.... enable sustainable economic growth.	6.... manage material assets sustainably.	7.... protect physical resources and use sustainably.	8.... encourage active and sustainable travel.	9.... improve air quality.	10....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	++	0	+	0	0	+	0	0	0	0	0	0
Revised Assessment	++	++	++	0	+	0	0	+	0	0	0	0	0	0
Expected outcome of implementing the change														

FC6 Policy CF1	The Council accepts the Department's request to provide details on the sequential approach. This is inserted into the policy text as indicated.

	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	0	++	++	+	0	+	0	+	0	0	0	+
Revised Assessment	++	++	0	++	++	+	0	+	0	+	0	0	0	+
Expected outcome of implementing the change														

FC7 – Policy RET4 Policy RET4 second paragraph	The Council has considered the representation and acknowledges that the 200sqm floorspace restriction is not referred to in Technical Supplement 4 Retail. The Council considers that floorspace is dealt with adequately under Policy RET3 in terms of the requirement for a retail impact assessment/assessment of need outside Newry City/Downpatrick Town Centre and all other town centres. The second paragraph of the policy is updated to take account of the removal of the 200sqm requirement in the first paragraph. The policy retains the requirement for shops at a roadside service facility within a settlement to not adversely affect the vitality and viability of existing centres.													
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	+	++	0	0	++	++	+	+	?	0	0	0	0	+
Revised Assessment	+	++	0	0	++	++	+	+	?	0	0	0	0	+
Expected outcome of implementing the change														

FC8 Policy RET7				The Council agrees with the Department to align wording with the SPPS and has removed reference to 'normally' from the policy.										
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	+	++	0	0	++	++	+	+	?	0	0	0	0	+
Revised Assessment	+	++	0	0	++	++	+	+	?	0	0	0	0	+
Expected outcome of implementing the change														

FC9 Policy TOU3				The Council agrees with the Department to align wording with the SPPS and has replaced 'substantial' with 'exceptional' within the policy.										
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	0	0	++	?	0	-	0	?	?	+	?	?
Revised Assessment	++	++	0	0	++	?	0	-	0	?	?	+	?	?
Expected outcome of implementing the change														

FC10 Policy MIN2														
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	**0**	**0**	**0**	**0**	**+**	**0**	**+**	**0**	**0**	**0**	**+**	**+**	**++**	**+**
Revised Assessment	**0**	**0**	**0**	**0**	**+**	**0**	**+**	**0**	**0**	**0**	**+**	**+**	**++**	**+**
Expected outcome of implementing the change														

The Council agrees with the Department that permitting exceptions on the basis that the Council is satisfied that they are short term and the environmental and amenity implications are not significant may be regarded as a further exception. Additional wording has been inserted to provide greater clarity.

FC11 Policy TCU1														
	The Council agrees with the Department that clarification should be provided regarding wording of policy by inserting new paragraph regarding telecommunications development in flood prone areas (and change 'considered' to 'permitted' in third paragraph).													
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	++	0	++	++	++	0	0	0	0	0	0	++	+
Revised Assessment	++	++	0	++	++	++	0	0	0	0	0	0	++	+
Expected outcome of implementing the change														

FC12 Policy WM2 Part b	The Council agrees with the Department in respect of aligning the dPS policy text with the SPPS wording for the loss of the best and most versatile agricultural land. The Council will insert an additional bullet point under Part b after the fifth criteria as indicated.

	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	++	0	0	0	+	++	+	-	-	+	+	+	+	0
Revised Assessment	++	0	0	0	+	++	+	-	-	+	+	+	+	0
Expected outcome of implementing the change														

FC13 Policy RE1				The SPPS Edition 2 published in December 2025 no longer contains a policy requirement for wind farm development to have a separation distance of 10 times rotor diameter. The revised policy states that separation distance will be assessed on a case-by-case basis. The policy text has been updated to reflect the revised wording in the SPPS Edition 2 (para 6.227).										
	1.... improve health and well-being.	2.....strengthen society.	3.....provide good quality, sustainable housing.	4.....enable access to high quality education.	5.....enable sustainable economic growth.	6.....manage material assets sustainably.	7.....protect physical resources and use sustainably.	8.....encourage active and sustainable travel.	9.....improve air quality.	10.....reduce causes of and adapt to climate change.	11.....protect, manage and use water resources sustainably.	12.....protect natural resources and enhance biodiversity.	13.....maintain and enhance landscape character.	14.....protect, conserve and enhance the historic environment.
Original Assessment	0	0	0	0	+	++	?	0	++	++	+	+	++	+
Revised Assessment	0	0	0	0	+	++	?	0	++	++	+	+	++	+
Expected outcome of implementing the change														