

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

# Plean Forbartha Áitiúil an Iúir, Mhúrn agus an Dúin Newry, Mourne and Down Local Development Plan 2030

Pléfháipéar Tosaíochta  
Preferred Options Paper



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



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

Proud of our past.  
Building our future  
together.



June 2018

Above: Cone of Light, Central Promenade,  
Newcastle. Front Cover: The Mournes,  
Newcastle and The Quay, Killyleagh

# Réamhrá



Councillor Roisin Mulgrew  
Chairperson of  
Newry, Mourne and Down  
District Council



Liam Hannaway  
Chief Executive of  
Newry, Mourne and Down  
District Council

Is cúis áthais do Chomhairle Ceantair an Iúir, Mhúrn agus an Dúin ár bPlépháipéar Tosaíochta(PT) a thabhairt i bhur láthair mar an chéad chéim tábhachtach in ullmhúchán Phlean Forbartha Áitiúil an cheantair(PFA). Léiríonn an Plépháipéar Tosaíochta seo tús oifigiúil na Comhairle ar ullmhúchán plean forbartha nua don cheantar.

Sa bhliain 2015 aistríodh cumhachtaí pleanála chuig an Chomhairle, agus mar údarás pleanála tá an Chomhairle freagracht as ullmhúchán PFA. Ó 2015 ar aghaidh, déanann an Chomhairle cinntí pleanála atá bunaithe ar Phleananna Áitiúla atá ann cheana agus ar pholasaithe pleanála an rialtais láir. Tugann an PFA seo deis dúinn straitéis spáis, polasaithe pleanála agus tosaíochtaí a chur le chéile a fhreastlaíonn ar riachtanais an cheantair.

Leis na freagrachtaí le chéile i leith ullmhúcháin an PFA agus Pleanáil an Phobail, bíonn deis mhór ag an Chomhairle tionchar a bheith aici i bhforbairt an cheantair atá le teacht. Tabharfaidh an PFA tacaíocht do chur i bhfeidhm agus cur i gcrích Phlean Pobail na Comhairle –Beo Beathach le chéile. Úsáidfear an PFA mar spásíomhá Phlean an Phobail agus le chéile cuirfidh siad athruithe dearfacha i bhfeidhm inár bpobail áitiúla, agus tá an dá Phlean dírithe ar an fhís choiteann a fhíorú gur:

# Foreword

**Cheantar é an tlúr, Múrna agus an Dún le tréanphobail shábháilte, bheo, áit ina bhfuil dea-chaighdeáin beatha ag achán duine agus fáil ar dheiseanna, roghanna agus sheirbhísí d'ardchaighdeán atá inbhuanaithe, inrochtana agus a fhreastlaíonn ar riachtanais na ndaoine.**

Chun an fhís seo a fhíorú díríonn an pleán seo ar chuspóirí sóisialta, eacnamaíochta agus comhshaoil a fhreastlaíonn ar riachtanais an cheantair. Soláthraíonn an PFA creatlach pleanála riachtanach don cheantar suas go 2030, chun fás agus forbairt inbhuanaithe a éascú.

Aithníonn an PT eocharcheisteanna pleanála a bhfuil gach cuma orthu go dtiocfadh siad i bhfeidhm ar chruth na forbartha atá le teacht fud fad an cheantair. Cíorann an doiciméad seo roghanna chun tabhairt faoi na ceisteanna seo agus léirítear an rogha is fearr leis an Chomhairle.

Is í príomhfheidhm an PT, atá ina chéad doiciméad chomhairliúcháin phoiblí sa phróiseas ullmhúcháin phleain, díospóireacht a ghríosadh, áiseolas a spreagadh a théann i bhfeidhm ar forbairt an PFA. Moltar do dhaoine, dár bpobail agus do pháirtithe leasmhara, a bhfuil speis acu i bhforbairt an cheantair seo atá le teacht, páirt a ghlacadh in ullmhúcháin an chéad PFA don lúr, Múrna agus an Dún. Tig libh bhur moltaí ar an PT a bhreacadh síos agus a sheoladh ar ais chugainn. Tá bhur moltaí thar a bheith tábhachtach dúinn. Is le chéile a dtig linn fiordhifear a dhéanamh i ndul i bhfeidhm ar thodhchaí ár gceantar agus fíis an cheantair a fhíorú.

Newry, Mourn and Down District Council is pleased to present our Preferred Options Paper (POP) as the initial stage and an important step in the preparation of the district's Local Development Plan (LDP). This POP represents the Council's formal commencement of work on the preparation of a new development plan for the district.

With the transfer of the majority of planning powers to the Council in 2015, the Council as the planning authority is now responsible for the preparation of a LDP for the district. Since 2015, the Council has been making planning decisions based upon the existing Area Plans and planning policies produced by central government. This LDP is our opportunity to set our own spatial strategy, planning policies and priorities to meet the development needs of Newry, Mourn and Down district.

With the combined responsibilities for the preparation of the LDP and Community Planning, there is the real opportunity for the Council to shape the future development of our district. The LDP will support the implementation and delivery of the Council's Community Plan – Living Well Together. The LDP will serve as the spatial reflection of the Community Plan and together they will deliver positive changes to our local communities; both are focussed on delivering a shared vision that:

**Newry, Mourn and Down is a place with strong, safe and vibrant communities where everyone has a good quality of life and access to opportunities, choices and high quality services which are sustainable, accessible and meet people's needs.**

The delivery of this shared vision will focus on the achievement of social, economic and environmental objectives to meet the needs of the district. The LDP will provide an essential planning framework for the district up to 2030, facilitating sustainable growth and development.

The POP identifies the key planning issues that are likely to influence the shape of future development across the district. The document discusses options to address these issues and presents the Council's preferred option.

The main purpose of the POP, which is the first public consultation document in the plan preparation process, is to stimulate debate and encourage feedback to inform the development of the LDP. The public, our communities and all stakeholders who have an interest in the future development of our district are encouraged to participate in the preparation of this, the first LDP for Newry, Mourn and Down. You can do this by submitting your comments in response to this POP. Your views are very important to us. Together, we can make a real difference in shaping the future of our district and achieve our vision.

# Consultation Arrangements

**This Local Development Plan: Preferred Options Paper is a consultation document, open for public comment for a 12 week period from 1 June to 24 August 2018.**

This POP document, together with the associated documents, can be viewed and downloaded from the Council's website at:

**[www.newrymouredown.org](http://www.newrymouredown.org)**

The documents are also available in hard copy to view during normal office hours at the Council's offices:

**Newry Planning Office,  
O'Hagan House, Monaghan Row,  
Newry BT35 8DJ.**

or...

**Downpatrick Planning Office,  
Downshire Civic Centre,  
Downshire Estate, Ardglass Rd,  
Downpatrick BT30 6GQ.**

Public Engagement Events will be held throughout the district **during June 2018**. See the Council's website and local press advertisements for details.

Your comments are invited on the options raised in this paper. Comments must be planning related. Please state if you support each of the preferred options and why; if you disagree or wish to propose an alternative, please submit evidence to support your viewpoint.

Your comments may be submitted by email to:

**ldp@nmandd.org**

preferably by using the online questionnaire at:

**www.newrymournedown.org**

Alternatively, you can write to the Council, all comments in response to this consultation document to be clearly referenced 'LDP: Preferred Options Paper' and addressed to:

**LDP: Preferred Options Paper  
Development Plan Team  
Council Offices  
Downshire Civic Centre,  
Downshire Estate, Ardglass Rd  
Downpatrick, BT30 6GQ.**

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

The Closing Date for receipt of comments is **5pm on Friday 24 August 2018.**

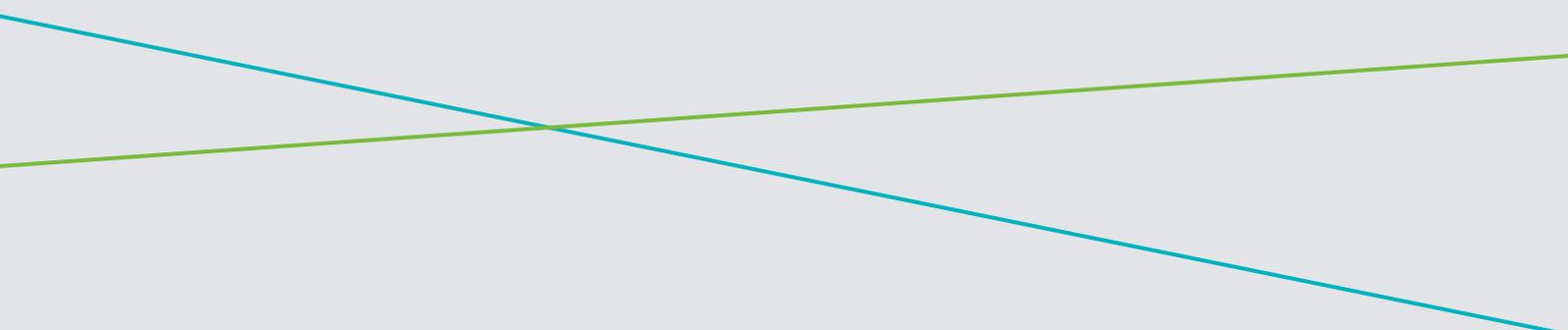


The Quays, Newry

Down Cathedral

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Down Arts Centre, Downpatrick

Newry Cathedral

The Mournes

## 1. Introduction

# Why is Planning Important?

**1.1** The planning system directly affects the environment that we live in, where we live, work, shop and spend our leisure time.

Planning decisions determine where new homes, offices, shops and leisure facilities are located and what happens to our countryside, open spaces, historic and natural environment. In doing so it influences our quality of life and general wellbeing.

**1.2** Planning has to balance competing land uses, shaping places by setting out the vision for how communities change. For many people planning is something they only get involved with when a development directly affects them, this can sometimes be too late to really influence the process.

By getting involved in the early stages of plan development and local planning policy formulation, you can help shape the way our environment looks and works.

**1.3** The Council is committed to ensuring that engagement in the planning system is meaningful, inclusive and fit-for-purpose and that all its citizens share a sense of effective participation in the decision making process.

The Council aims to ensure that everyone has an early and informed opportunity to express their views on the development of the district and have them considered before decisions are made.

## Introduction

# Newry, Mourne and Down Local Development Plan: Preferred Options Paper

**1.4** This Preferred Options Paper (POP) represents the Council's formal commencement of work on the Local Development Plan (LDP) for Newry, Mourne and Down district. It is also the first public consultation document in the LDP process. The POP has been prepared in accordance with the legislative requirements of the Planning Act (Northern Ireland) 2011 and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

**1.5** The purpose of the POP is to set out the vision, strategy and objectives for the district up to 2030 and to identify key planning issues of strategic significance that are likely to influence the shape of future development within the district.

**1.6** The POP does not cover every issue, policy and proposal that will be included in the LDP, but seeks to address the main planning issues that have emerged or been identified through the work undertaken in developing the evidence base for the LDP, from consultation with statutory consultees, council officials, elected members and through the Community Plan process. The priorities identified in the Council's Corporate Plan and the Community Plan have helped define some of these issues.

**1.7** The POP identifies and explores a series of options to address these key issues and in each case defines the Council's preferred option and its justification. However, it should be noted that no final decisions have been made at this stage of the LDP process.

**1.8** As set out in our Statement of Community Involvement (SCI)<sup>1</sup> the intention of the POP is to stimulate a wide-ranging, yet focused, debate on the key issues and encourage feedback from a wide variety of interests. The aim is for all interested parties to become involved in a more meaningful way at the earliest stage of the LDP preparation process. Any representations or views received in response to the POP will be considered whilst formulating the draft Plan Strategy.

**1.9** The publication of the POP allows the public, communities and stakeholders to get involved with the development of the LDP from the outset and provides an opportunity to put forward views and have an influence on how the future of the district is shaped.

**1.10** Details of the consultation arrangements and how you can comment on the POP are set out on page 4.

<sup>1</sup> The SCI can be viewed and downloaded from the Council's website at [www.newrymournedown.org](http://www.newrymournedown.org)

# Local Development Plan Background

**1.11** The LDP is part of the reformed planning system introduced by the Planning Act (Northern Ireland) 2011 (the 2011 Act) and the transfer of the majority of planning powers and responsibilities from central government to the 11 new councils in April 2015.

The 2011 Act provides for the preparation of a LDP by a council for its district, which will, when adopted, replace current development plans produced by the former Department of the Environment (DOE). The 2011 Act transferred responsibility for the preparation of development plans from the DOE to the new councils and establishes a planned system which gives primacy to the development plan in the determination of planning applications unless other material considerations indicate otherwise.

**1.12** Newry, Mourne and Down District Council is now responsible for the preparation of a LDP for the district. The new development plan will replace the existing development plans in so far as they apply to the district:

**Banbridge/Newry and Mourne Area Plan 2015 (BNMAP)**  
[adopted October 2013]

**Ards and Down Area Plan 2015 (ADAP)**  
[adopted March 2009]

**1.13** The existing plans will remain in force as the statutory development plans for the district until such time as they are replaced by the **Newry, Mourne and Down Local Development Plan 2030** when it is adopted.



## Introduction

# Local Development Plan

## What is the Local Development Plan?

**1.14** The LDP is principally a land use planning policy document that will guide the future use of land in the district. It will allocate appropriate land for differing types of land use and set out the main planning requirements to be met in respect of particular zoned sites and designations. The purpose of the LDP is to:

- Apply regional planning policies at the local level
- Inform the general public, communities, statutory authorities, public bodies, developers, representative organisations and other interests of the policy framework and land use proposals that will be used to guide development decisions and determine proposals in the district up to 2030
- Be the primary consideration in the determination of planning applications for the development or use of land.

**1.15** In preparing the LDP the Council must take account of the regional policy context set by the Northern Ireland Executive and central government departments. In applying regional policies at the local level, the LDP will be a fundamental tool in the implementation of central government policies and strategic objectives, particularly those set out in the Regional Development Strategy 2035 (RDS) and the Strategic Planning Policy Statement for NI (SPPS).

**1.16** The RDS represents the overarching regional planning framework, while the SPPS provides an overarching statement of the general planning principles underlying the planning system.

**1.17** While the LDP will provide the essential framework for planning decisions within the district, the SPPS provides a robust planning policy framework within which the Council will prepare the LDP and manage development.

**1.18** The function of the LDP is to:

- Provide a 15 year plan framework to support the economic and social needs of the district in line with regional strategies and policies, while providing for the delivery of sustainable development
- Facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the wellbeing of the community
- Allocate sufficient land to meet the district's needs
- Provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place
- Provide a plan-led framework for rational and consistent decision making by the public, private and community sectors and those affected by development proposals
- Deliver the spatial aspects of the Council's Community Plan.

**1.19** The LDP system aims to move away from a narrow land use focus towards a 'place-shaping' approach. It provides an opportunity for the Council to shape places for local communities and will enable it to adopt a joined-up approach, incorporating linkages to other functions such as local economic development and community planning. The LDP will be prepared in the context of the Council's Corporate Plan and will take account of the Council's Community Plan to enable us to plan for the future of the district.

**1.20** The Local Government Act (Northern Ireland) 2014 introduces a statutory link between the Community Plan and the LDP, in that the preparation of the LDP must take account of the Community Plan. It is intended that the LDP will be the spatial reflection of the Community Plan working in tandem towards the same vision for the Council area and its communities and set the long-term social, economic and environmental objectives for the district.

**1.21** The reformed development plan process has introduced a two stage approach to plan production. The LDP will consist of two development plan documents, the Plan Strategy and the Local Policies Plan which will shape development within our district in the period to 2030. The first stage will be the Plan Strategy followed by the Local Policies Plan.

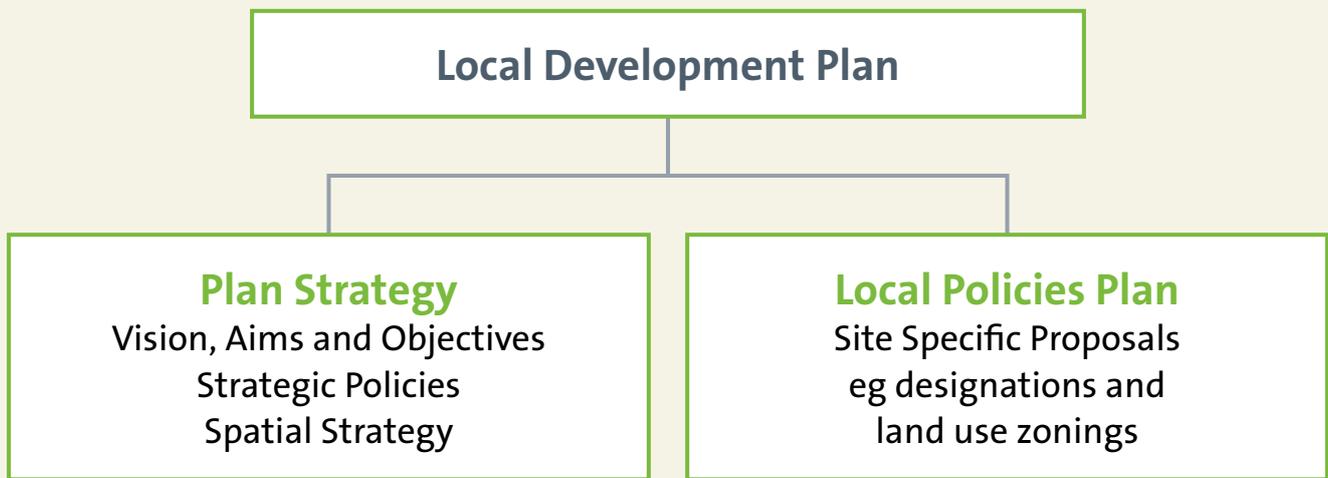


Figure 1: The Local Development Plan Documents

**1.22** The Plan Strategy will establish the strategic direction of the LDP for the future development of the district. This will provide a level of certainty on which to base development decisions across the district as well as the necessary framework for the preparation of the Local Policies Plan. The Plan Strategy will set the aims, objectives, overall growth strategy and associated strategic policies applicable to the district.

It will include a range of strategic policies to facilitate and manage development together with a spatial strategy. This will indicate in broad terms where different types of development will be promoted and should be located and areas that are more sensitive or vulnerable, where development, or certain types of development, may be restricted.

**1.23** Once the Plan Strategy is adopted a Local Policies Plan will be prepared which will be consistent with the Plan Strategy and will contain the Council’s detailed land use policies and proposals regarding the future development of the district. In contrast to the Plan Strategy, the Local Policies Plan will deal with site specific policies and proposals associated with settlement limits, land use zonings and environmental designations required to deliver the Council’s vision, objectives and strategic policies.

**1.24** Both the Plan Strategy and the Local Policies Plan will be subject to public consultation and independent examination prior to adoption.

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## Introduction

### Local Development Plan

#### What is the Local Development Plan?

**1.25** Once the Plan Strategy is adopted it will replace the relevant regional operational policies published by central government and currently retained within the various topic based Planning Policy Statements (PPSs) and the Planning Strategy for Rural Northern Ireland (PSRNI). These will no longer be material considerations in the determination of planning applications. It will also replace the corresponding parts of the existing development plans, the BNMAP and ADAP, in so far as they relate to the district. The remaining provisions of the existing development plans will be replaced upon adoption of the Local Policies Plan.

**1.26** The Council will monitor the implementation of the LDP annually to ensure progress in meeting its objectives. An Annual Monitoring Report will focus on key indicators and any other relevant information regarding the implementation of the LDP such as take up of housing and employment land. The Council will also undertake regular reviews of the LDP at least every five years from the date of adoption of the Local Policies Plan.

**1.27** There are four Key Stages in the LDP process:

- **Stage 1:**  
Initial Plan Preparation

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- **Stage 2:**  
Preparation and Adoption of Plan Strategy

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- **Stage 3:**  
Preparation and Adoption of Local Policies Plan

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- **Stage 4:**  
Monitoring and Review

## Stage 1:

### Initial Plan Preparation

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**1.28** This stage includes the development of the evidence base, preparation of the SCI and Timetable and the production of the POP. The Timetable sets out the Council's programme for the production of the Plan Strategy and Local Policies Plan including key milestones and timelines from plan production through to adoption. The SCI promotes a more meaningful and effective approach to enable interested parties and the local community to engage early in the plan process and throughout its preparation. The SCI informs the general public and all stakeholders of how, where and when they can become involved in the LDP preparation process and the timescale for doing so.

**1.29** In preparing the POP, the Council must also undertake the initial stages of the Sustainability Appraisal (SA). The SA is a continual process that runs parallel with the preparation of the LDP. A SA Interim Report (consisting of SA Scoping Report and assessment of alternatives) is published with the POP.

## Stage 2:

### Preparation and Adoption of Plan Strategy

**1.30** This stage of the LDP preparation process consists of the preparation and publication of the draft Plan Strategy which will be subject to an independent examination prior to adoption. The Council will prepare a draft Plan Strategy based on both the information gathered and also the public and stakeholders' responses to the POP. As part of this process, the Council will also carry out a range of assessments including SA, Equality Impact Assessment (EQIA), Habitats Regulations Assessment and Rural Proofing. The Council will then publish its draft Plan Strategy, SA and other assessments for public consultation.

**1.31** Central government (currently the Department for Infrastructure (DfI)) will appoint the Planning Appeals Commission (PAC) or other independent examiners to hold the independent examination. This will examine the draft Plan Strategy against 'soundness' tests which will relate to how the Plan Strategy has been produced and how it has taken account of central government plans, policy and guidance and also its coherence, consistency and effectiveness. Following the independent examination, the examiner will issue a report of its findings to central government which will in turn consider this and issue a binding report to the Council. On this basis, the Council must incorporate any changes outlined in the binding report and subsequently adopt the Plan Strategy.

## Stage 3:

### Preparation and Adoption of Local Policies Plan

**1.32** The Local Policies Plan must be consistent with the adopted Plan Strategy and incorporate detailed site specific proposals for the Plan area. The Plan Strategy must be adopted before the draft Local Policies Plan is published for consultation, subjected to independent examination and adopted. The process for the preparation of the Local Policies Plan is largely similar to that of the Plan Strategy outlined above. The draft Local Policies Plan and associated assessments will also be published for public consultation. Following this, the process for independent examination and adoption of the Local Policies Plan will be similar to that of the Plan Strategy. These two adopted documents will then comprise the LDP for the district.

## Stage 4:

### Monitoring and Review

**1.33** The final stage in the LDP preparation process is Monitoring and Review which are essential in establishing how the objectives of the LDP are being achieved and whether any changes are required. Regular monitoring of the implementation of the LDP is required and this will include the preparation of an Annual Monitoring Report that specifies the amount of housing and economic land, the number of housing completions and any other relevant information regarding the implementation of the LDP. The Annual Monitoring Report must also be submitted to central government. The Council will also be required to undertake regular reviews of the LDP at least every five years from the date of adoption of the Local Policies Plan and submit its findings to central government.

Introduction

# Local Development Plan

## What is the Local Development Plan?

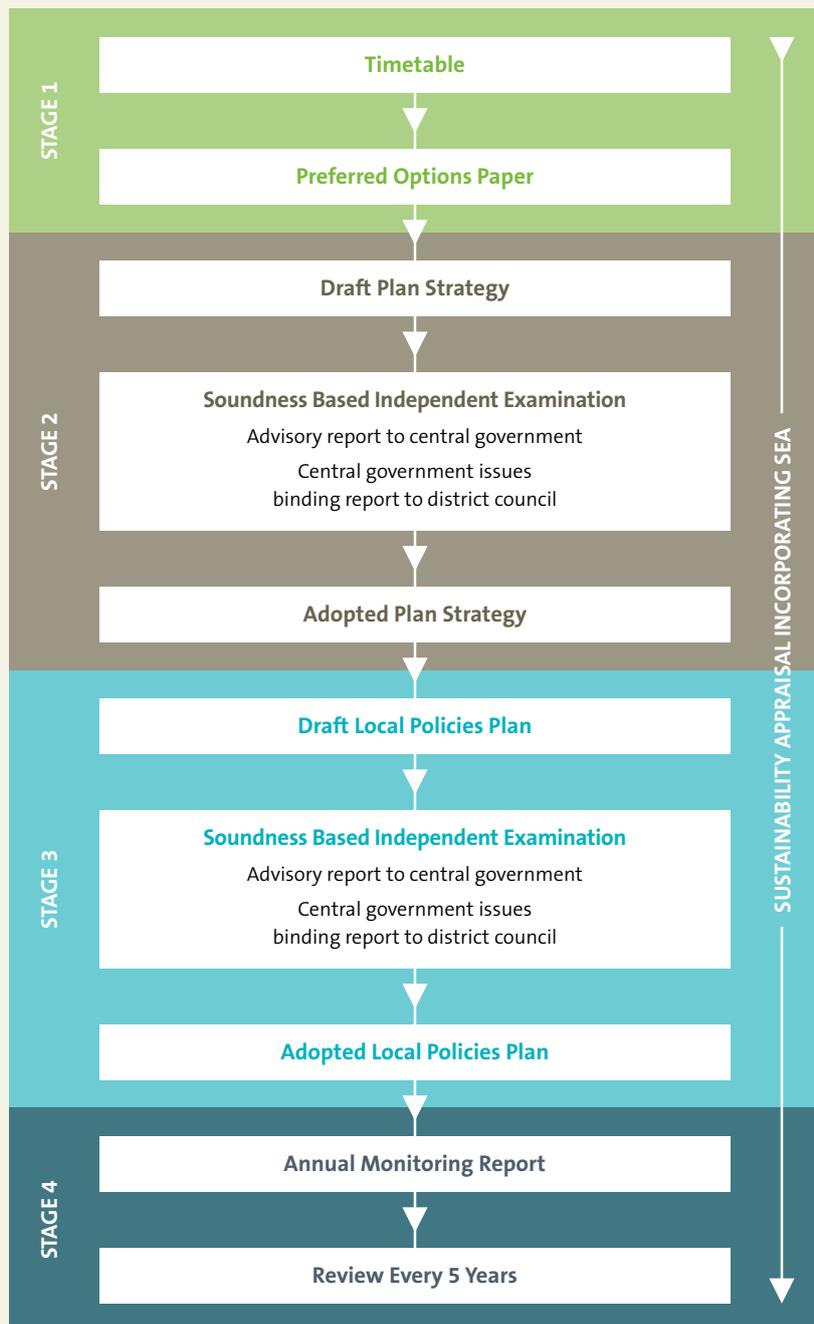


Figure 2: The Local Development Plan Process

# Local Development Plan

## Where are we in the Local Development Plan process?

**1.34** The Council is currently at Stage 1 of the LDP process, 'Initial Plan Preparation'. As referenced above, this includes the development of the evidence base, preparation of the SCI and Timetable and the production of the POP.

**1.35** Following agreement from DfI in 2017 the Council published its SCI and Timetable<sup>2</sup>. As part of the initial plan preparation stage to inform the LDP the Council has developed an evidence base of information on the district. This has informed the preparation of the POP and has included:

- 16 topic based preparatory papers<sup>3</sup>
- Consultation meetings with a number of statutory consultees and Council departments
- Consultation with elected members through presentation of preparatory papers to relevant Committees and other meetings, a series of LDP Member workshops which covered a number of related topics, identified issues and explored options
- A preliminary review of operational planning policy.

**1.36** In preparing the POP, the Council has also undertaken the initial stages of SA. The SA seeks to integrate social, environmental and economic considerations and is a continual process that commences with the preparation of the POP and follows through the Plan Strategy and Local Policies Plan stages. At the POP stage it assists in the consideration of options and alternatives.

**1.37** This preparatory work has informed this POP. Publication of the POP for public consultation marks the final phase of Stage 1 of the LDP process.

### Structure of the Preferred Options Paper

**1.38** As set out in the Contents page, following this Introduction the structure of the POP provides:

- **District Profile (Chapter 2)**  
In providing a profile of the district, this chapter sets the context for the LDP by illustrating key characteristics and features. Drawing from the evidence base it sets the scene

and assists in identifying the key planning issues which the LDP will seek to address.

- **Regional and Local Policy Context (Chapter 3)**

This chapter sets out the wider policy hierarchy and context within which the LDP is prepared.

- **Plan Vision and Objectives (Chapter 4)**

With reference to the statutory link between the LDP and the Community Plan, this chapter sets out the Council's shared vision for the district and highlights the Community Plan's outcomes, priority areas and activities that are relevant to the LDP. In delivering the shared vision and addressing the Community Plan's priority areas and activities the chapter sets out the social, economic and environmental themes and associated objectives.

**1.39** The next four chapters of the document identify key issues under four themes. It outlines the regional policy context and the local context for each key issue and explores a series of options to address them. It also provides a summary of the related SA process in the assessment before setting out the Council's preferred option and its justification. In presenting the preferred option, the consideration of each key issue concludes with a number of associated consultation questions to assist interested parties in responding to the POP.

The **four** themes are:

- **Spatial Growth Strategy: Promoting Urban Centres and Supporting Sustainable Rural Development (Chapter 5)**

- **Social: Accommodating People, Improving Health and Wellbeing (Chapter 6)**

- **Economic: Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure (Chapter 7)**

- **Environmental: Protecting and Enhancing the Environment (Chapter 8)**

**1.40** The POP concludes by setting out the Next Steps (**Chapter 9**).

<sup>2</sup> The SCI and Timetable can be viewed and downloaded from the Council's website at [www.newrymournedown.org](http://www.newrymournedown.org)

<sup>3</sup> The preparatory papers are available to view on the Council's website at [www.newrymournedown.org/planning](http://www.newrymournedown.org/planning)



Mill Meadows, Bessbrook



Cloughmore Stone, Kilbroney Park, Rostrevor

## 2. District Profile

# Spatial Characteristics

**2.1** Newry, Mourne and Down district is located to the south east of Northern Ireland (NI) and covers parts of County Down and County Armagh. To the north the district borders with Armagh City, Banbridge and Craigavon Borough Council, Lisburn and Castlereagh City Council and Ards and North Down Borough Council. To the south and west it borders Monaghan and Louth County Council areas in the Republic of Ireland.

**2.2** The district is strategically located along the key transport corridor between Belfast and Dublin. The district's main settlement, Newry, is identified as a main hub and as the South Eastern City Gateway with the Republic of Ireland by the RDS<sup>4</sup>. The district's second largest settlement, Downpatrick, is also identified as a main hub while Warrenpoint and Newcastle are identified as local hubs. Warrenpoint port is the second busiest port in the province, whilst Kilkeel and Ardglass fishing harbours play a significant role with the majority of NI's fishing fleet based in these two harbours.

<sup>4</sup> Regional Development Strategy 2035 (RDS)

## District Profile

### Local Development Plan Spatial Characteristics



Map 1: The Geographical Context of the District

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**2.3** The district covers an area of approximately 1,700km<sup>2</sup> and has approximately 160km of coastline taking in stretches of Strangford Lough, the Irish Sea and Carlingford Lough. It contains a diverse range of landscapes including the Mourne Mountains, Ring of Gullion, the drumlins and islands around Strangford Lough, Quoile Valley lowlands, coastal dunes and Newry basin. There are three Areas of Outstanding Natural Beauty (AONBs) which cover 55.7% of the district. These areas have a distinctive character and have been designated in recognition of the quality of their landscape, heritage and wildlife.

# Local Development Plan

## Population

**2.4** According to the 2011 Census the total population of Newry, Mourne and Down District Council area increased by 12.2% from 152,881 to 171,533 between 2001 and 2011. The total population has further increased and was estimated to be 177,994 in 2016<sup>5</sup>. This trend is expected to continue through the plan period with a projected increase to 194,994 by 2030<sup>6</sup>. This represents a 9.7% increase within the plan period.

**2.5** The demography of our population is also changing with the number of residents aged 65 and over expected to increase from 26,599 in 2016 to 39,945 in 2030<sup>7</sup>. This proportion of our population is therefore expected to increase from 14.7% in 2015 to 20.3% by 2030. In addition the number of residents aged 0-15 is expected to decrease during the plan period with this portion of our population expected to decrease from 22.37% in 2015 to 20.94% in 2030. These demographic changes are likely to have implications for housing needs, education provision and access to healthcare and community services in the district.

**2.6** The 2011 Census identified that 65% of the district's population reside in the 88 designated settlements with 16% living in Newry City, 24% living in the 7 towns, 20% within the 28 villages and 5% within the 52 small settlements. The remaining 35% of the population were living outside the settlements in the open countryside.

**2.7** At the time of the 2011 Census 10.72% of households were comprised of a single person aged 65 and over<sup>8</sup> and 17.55% of households did not have access to a car or van<sup>9</sup>. This has implications for housing, infrastructure and access to key services.

## Society

**2.8** The NI Multiple Deprivation Measure 2017 reveals that Newry, Mourne and Down district was ranked as the third most deprived area out of the 11 local government districts<sup>10</sup>. This takes into consideration indicators such as income, employment, health, education, proximity to services, crime and living environment.

**2.9** In 2011<sup>11</sup> 19.85% of the district's population reported having a long-term health problem or disability that limited their day-to-day activities. While 11.79% of people stated that they provided unpaid care to family, friends, neighbours or others. With an ageing population the number of people living with long-term health problems and the level of care necessary is expected to continue to rise over the plan period. Of those aged 65 and over 16,173 (70.5%<sup>12</sup>) were living with a long-term health condition. The most prevalent health issues were mobility problems, deafness or long-term pain or discomfort. This is likely to have impacts upon factors such as the need to provide care at home, the provision and supply of suitable housing stock and access to health and community services.

**2.10** In 2015 34.1% of people aged 16-64 in the district were educated to NVQ Level 4 or above, which was above the NI average of 29.9%<sup>13</sup>. 14.2% had no qualifications - this was below the NI average of 16.5%. The provision of education and the level of education attainment in the district is an important factor in sustaining the local economy as skilled people are necessary to avail of opportunities in existing and emerging sectors.

<sup>5</sup> Northern Ireland Statistics and Research Agency (NISRA) Population Projections 2014-based

<sup>6</sup> NISRA Population Projections 2014-based

<sup>7</sup> NISRA Population Projections 2014-based

<sup>8</sup> Northern Ireland Neighbourhood Information Service (NINIS) NMD Area Profile 2017

<sup>9</sup> NISRA Car or Van Availability: KS405NI (administrative geographies).

<sup>10</sup> Northern Ireland Multiple Deprivation Measure 2017

<sup>11</sup> NI Census 2011

<sup>12</sup> NINIS Area Profile Report October 2017

<sup>13</sup> NINIS Area Profile Report October 2017

## District Profile

# Local Development Plan Housing

**2.11** In 2011 there were a total of 61,998 households in the district. This represented an increase of 18.6% since 2001<sup>14</sup>. This figure is expected to rise to 74,086 by 2030<sup>15</sup> which is a further increase of 19.5%. This is not only caused by an increase in population but also by a decline in household size (predicted to fall from 2.72 people in 2016 to 2.64 in 2030) and changing demographic patterns.

**2.12** In 2011 70.4% of households were owner occupied while the remaining 29.6% were rented (including shared ownership)<sup>16</sup>. The majority of dwellings in the district were detached (48.9%) which is significantly higher than the NI average of 37.6%. This reflects the more rural nature of the district. The figure for semi-detached dwellings is similar to the NI average, whilst the amount of terraced dwellings and flats is lower than the NI average<sup>17</sup>.

**2.13** The housing requirement for the district set by the former Department for Regional Development (DRD) and projected to the end of the plan period (2012-2030) amounts to 15,092 units. The housing monitor shows that committed sites (those still to be developed) and zoned sites together with completed sites (developed since the start of 2012) amount to 14,533. This amounts to 96% of the district's housing allocation for the plan period. Therefore it is not envisaged that there is a large requirement for additional housing lands through extension to settlement limits within the plan period.

**2.14** 10% of all households in the district reside in social housing tenure compared to the NI average of 15%<sup>18</sup>. However, need for social housing in the district has remained at a very high level since 2010 with a 31% increase from 2012.<sup>19</sup> The current five year Housing Needs Assessment (HNA) (2016-2021) shows there is a need for 1,906 units across the district. Need is highest in Newry (698), Newcastle (218), Warrenpoint (196) and Downpatrick (148). However, it is also evident throughout the rural hinterland.

<sup>14</sup> NI Census 2001 and 2011

<sup>15</sup> NISRA Household Projections 2012- based

<sup>16</sup> Tenure and Landlord: KS402NI (administrative geographies)

<sup>17</sup> NISRA Table CT0187NI – Accommodation Type 2011

<sup>18</sup> NI Census 2011

<sup>19</sup> NMD Housing Investment Plan Annual Update 2017 NIHE



# Local Development Plan

## Economy

**2.15** In terms of employment, economic activity in the district is the same as the NI average with 66.2% of the population being described as economically active<sup>20</sup>. However, the district has a slightly higher level of unemployed people aged between 16-64 (5.59%) than the NI average (4.96%). In addition, the median weekly wage in the district was slightly lower than the NI median with £483.80 compared to £501.20 respectively<sup>21</sup>.

**2.16** In 2015 the number of employee jobs in the district was 52,341<sup>22</sup>. The majority of these jobs, 78.4%, were in services whilst 12.7% were in manufacturing and 6.6% in construction. While the amount of jobs in services appears high, this is below the NI average which is 83.1%. The district has a higher proportion of construction and manufacturing jobs (19.3%) than the NI average of 15.54%.

**2.17** In 2017 there were 8,110 businesses registered for VAT and/or PAYE in the district. Of these businesses, 35 had no employees, 7,300 had 1-9 employees (micro business), 670 had 10-49 employees (small business), 95 had 50-249 employees (medium business) and 10 had 250+ employees (large business)<sup>23</sup>. This shows that the vast majority (90%) of businesses

in the district are micro businesses employing between 1-9 people.

**2.18** In 2017 27.4% of VAT and/or PAYE Registered Businesses in the district were in the agriculture, forestry and fishing sector. This is the largest sector across the district which is representative of the district's rural nature and coastal location.

**2.19** In 2016 there were 3,787 farms located within the district with an agricultural labour force of 6,955<sup>24</sup>. Agriculture is the predominant land use across the district producing a range of livestock, dairy, cereals and crops.

**2.20** Warrenpoint is the province's second busiest sea port providing freight and shipping services and acts as a regional gateway to Britain and Europe. The port also offers potential for increased tourism through cruise ships.

**2.21** The majority of NI's fishing fleet are located at Ardglass and Kilkeel, which makes an important contribution to the district's economy. Kilkeel is the largest fishing port in NI and accounts for one third of all fish landed in NI. The fishing fleet and fish processing sector provide 1,920 jobs in the district.

**2.22** The mining and quarrying industry makes an important contribution to the district's economy, employing more than 250 people in mining and quarrying<sup>25</sup> with further employment provided through the manufacture of concrete and asphalt products worth approximately £25million to the district economy<sup>26</sup>.

**2.23** Tourism makes an important contribution to the district's economy. In 2016 the expenditure on overnight trips by all visitors to the district was just under £61million, an increase of 26.8% on the previous year. This was the third highest expenditure of all the council areas<sup>27</sup>. In 2015 the tourism industry provided 4,953 jobs for the district which was equivalent to 9.5% of all jobs in the district<sup>28</sup>.

**2.24** The district has a number of key tourist assets including the Mourne Mountains, the Ring of Gullion and Strangford Lough in addition to a number of country estates, forest parks, beaches, golf courses and activity centres. The district is the third most popular tourist destination out of the 11 council areas and received 12% of all visits to NI in 2016 - up from 9% in the previous year<sup>29</sup>. In 2016 there were an estimated 571,400 overnight trips to the district resulting in 1,562,073<sup>30</sup> overnight stays, an increase of 32% on the previous year.

<sup>20</sup> NISRA 2011 Census - Economic Activity: KS601NI (administrative geographies)

<sup>21</sup> Annual Survey of Hours and Earnings, Office for National Statistics (2016-Revised)

<sup>22</sup> NINIS employee jobs (administrative geographies)

<sup>23</sup> VAT and or PAYE Registered Businesses Operating in Northern Ireland 2009-17 (administrative geographies)

<sup>24</sup> NISRA farm census administrative geographies 1999-2016

<sup>25</sup> QPANI

<sup>26</sup> QPANI spreadsheet: Quarry Data Based on 10 Year Average Sept 2015

<sup>27</sup> Tourism - Estimated Overnight Trips, Nights and Expenditure (administrative geographies)

<sup>28</sup> Tourism - Employee Jobs administrative geographies (2011-2015)

<sup>29</sup> NISRA - Estimated number of Overnight Trips in NI by Local Government District, 2011-2016

<sup>30</sup> NISRA - Tourism: Estimated Overnight Trips, Nights and Expenditure (administrative geographies)

## District Profile

# Local Development Plan Environment

**2.25** The district has a rich and diverse natural environment with a range of contrasting landscapes. This is reflected by the number of natural environment designations at local, national and international level including 4 RAMSAR sites, 3 Special Protection Areas, 11 Special Areas of Conservation, 62 Areas of Special Scientific Interest and 2 National Nature Reserves. There are 3 AONB's covering approximately 55.7% of the district which reflects the high quality of the landscapes including the Mourne Mountains, Strangford Lough, and Slieve Gullion. Furthermore, there are 3 Special Countryside Areas (SCAs) in the district (the High Mournes, Slieve Croob and the Ring of Gullion) which have been designated for their exceptional landscapes. The quality of the landscape in the district is also demonstrated by the fact that 3 of the 9 Strategic Natural Resources identified by the RDS in NI are located in the district. These are The Mournes, The Ring of Gullion and Strangford Lough and Coast.

**2.26** The district has a strong built heritage which plays an important role in the overall appearance, character and sense of place of the area. There are 10 Conservation Areas in the district which is the second highest number of Conservation Areas of all the NI Council areas after Belfast. There are 27 Areas of Townscape Character (ATCs) and 1,438 Listed Buildings in the district. There are 3 Areas of Significant Archaeological Interest, 30 Areas of Archaeological Potential, 2016 archaeological sites and monuments (42 of which are historical monuments in state care, 286 are scheduled monuments and the remaining 1688 are unscheduled) and 924 Industrial Heritage sites within the district. There are also 35 Historic Parks, Gardens and Demesnes. The historic environment plays a vital role in the heritage of the district and provides residents and visitors with an understanding of our past.

**2.27** The district has approximately 160km of coastline which serves a vital role as a natural asset and tourist attraction, supporting the local and wider economy. Rising sea levels and climate change have the potential to significantly impact upon coastal areas as a result of coastal erosion and coastal flooding. Settlements identified as being at significant risk of flooding are Newry, Warrenpoint, Newcastle and Downpatrick. Furthermore a large proportion of the County Down coastline is at risk of coastal erosion.

# Local Development Plan

## Infrastructure



Map 2: Main Roads, Harbour and Port in the District

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**2.28** The district is served by a network of A class roads and an extensive network of smaller B class, C class and unclassified roads. There are no stretches of motorway in the district. However, there is approximately 29km of dual carriageway along the A1 and A2 roads.

**2.29** The district benefits from its position along a key transport corridor between Belfast and Dublin with the A1 dual carriageway passing through the south west of the district. Newry is a gateway to the Republic of Ireland and is well served by road, rail and bus links. Downpatrick is well served by road and bus links. Transport links from east to west across the district are weaker than those of north to south.

## District Profile

### Local Development Plan Infrastructure

**2.30** There are several strategic road schemes proposed within the district including the Ballynahinch By-pass, Newry Southern Relief Road and the Downpatrick Eastern Distributor.

**2.31** With nearly one in five households in the district not owning a private vehicle, the availability of public transport is a key consideration particularly for those who are elderly, or economically or socially disadvantaged. It is also an essential service for children who rely on buses to travel to school. Public transport is underutilised by those over the age of 16 and outside education, largely due to the rural nature of the district and poor connectivity.

**2.32** The district benefits from a strategic location along the coastline with several key ports and harbours including Warrenpoint, Kilkeel and Ardglass. Warrenpoint is the second largest port in NI with ferry and freight connections around the world and potential for further growth in tourism from visiting cruise ships.

**2.33** Modern telecommunications are an essential and beneficial element of everyday living for residents, businesses and visitors to the district. It is important to continue to support investment in high quality communications infrastructure which plays a vital role in our social and economic wellbeing. There have been significant broadband improvements throughout the district in recent years that have introduced and improved broadband services in rural and urban areas. However, Ofcom's Connected Nations report indicates that 7,900 premises in the district do not have access to a service delivering 10 Mbit/s<sup>31</sup>. This accounts for approximately 14% of the 56,000 premises in NI that cannot access this service.

**2.34** Mobile broadband provides a possible means to improve broadband coverage and speeds across our district. However, this is reliant on the network of telecommunications masts and pockets of no, or limited, telecommunication reception remain in some rural areas within the district.

**2.35** NI Water has responsibility for the supply of water as well as sewerage treatment facilities in NI. The district receives treated water from five water treatment works that supply the existing water distribution networks in the district including numerous service reservoirs which provide the necessary storage requirements. NI Water is satisfied with the sufficiency of the water supply to the district over the LDP time period.

**2.36** NI Water also has responsibility for Waste Water Treatments Works. It has identified capacity constraints serving a number of our settlements where there is either no capacity, or limited capacity for new connections. NI Water has an ongoing capital investment programme to upgrade and improve waste water treatment facilities throughout the district and the LDP will continue to engage with NI Water to ensure any development land allocations are appropriate.

**2.37** The Systems Operator for Northern Ireland (SONI) and Northern Ireland Electricity Networks (NIE Networks) are responsible for the electricity transmission and distribution grids across NI. The Council will liaise with both SONI and NIE Networks to ensure that proposed policies and designations within the Council's LDP will be supported by the district's grid infrastructure and the electricity network continues to be developed and enhanced to meet the district's needs.

<sup>31</sup> Ofcom currently defines this as broadband offering a download speed of 10Mbit/s with an upload speed of at least 1 Mbit/s.



Craigmore Viaduct, Newry



Silent Valley

3 Regional and Local Policy Context



Castleward



Killyleagh

## 3. Regional and Local Policy Context

**3.1** This chapter sets out the wider policy hierarchy and context within which the LDP is prepared. In preparing the LDP the Council must take account of the regional policy context set by the Northern Ireland Executive and central government departments. This includes amongst others, the Programme for Government, the RDS and the SPPS. It must also take into account any other policies or advice issued in guidance by central government. At a local level the LDP must take account of the Council's Community Plan and be central to the articulation of certain other Council strategies. Before considering the regional and local policy context and the interrelationship it has in the preparation of the LDP, there is first the need to understand the purpose of planning.

### The Purpose of Planning

**3.2** The objective of the planning system, consistent with the Planning Act (Northern Ireland) 2011 (the 2011 Act), is to secure the orderly and consistent development of land whilst furthering sustainable development and improving wellbeing. This means the planning system should positively and proactively facilitate development that contributes to a more socially, economically and environmentally sustainable NI. The Council, as planning authority for the Newry, Mourne and Down District Council area, should therefore simultaneously pursue social and economic priorities alongside the careful management of our built and natural environments for the overall benefit of society.

**3.3** Creating places where communities flourish and enjoy a shared sense of belonging, both now and in the future, is fundamentally what planning is all about. In order to make positive change on the ground, the Council should prioritise timely and predictable decision making to support positive place-making and effective stewardship that contributes to shaping high quality sustainable places to live, invest, work and spend leisure time. A key dimension of sustainable development for NI is economic growth. This requires the planning system to continue to provide protection to the things we cherish most about our built and natural environment, including our heritage assets while

unlocking development potential, supporting job creation and aiding recovery for all. The planning system operates in the public interest of local communities and the region as a whole and encompasses the present as well as future needs of society.

**3.4** In furthering sustainable development and improving wellbeing it is crucial that the planning system supports the Northern Ireland Executive's Programme for Government commitments and priorities, as well as the aims and objectives of the RDS.

## Regional and Local Policy Context

# Local Development Plan Regional Policy Context

### Draft Programme for Government Framework 2016-2021

**3.5** The Northern Ireland Executive's draft 'Programme for Government 2016-2021' outlines 14 strategic outcomes which are considered to best describe the society we wish to have. These outcomes are supported by 42 indicators which are clear statements for change and each is accompanied by a measure which indicates performance in relation to the outcomes and provides a basis by which to monitor progress and take appropriate corrective action. Some of these 42 indicators have a direct link to spatial planning.

### Regional Development Strategy

**3.6** The RDS sets out a strategic, long-term vision on the future development of NI up to 2035. It provides an overarching strategic planning framework and influences the future distribution of development throughout NI. The RDS contains strategic regional guidance which provides policy direction in relation to economic, social and environmental matters aimed at achieving sustainable development and social cohesion. The RDS also contains spatial framework guidance which relate to five key component areas of the spatial framework; three of the component areas relate to this district:

- **Hubs and Clusters of Hubs** - The RDS identifies Newry and Downpatrick as the two 'Main Hubs' in the district. Warrenpoint and Newcastle are identified as 'Local Hubs'. In the delivery of services and functions it states that Newry has the potential to cluster with Warrenpoint, and Downpatrick has the potential to cluster with Newcastle. The RDS acknowledges Newry as a significant employment centre with a strong retail offering and an acute hospital.

The RDS acknowledges that Newry is strategically located along the key Belfast-Dublin transport corridor and identifies Newry as the South Eastern City Gateway due to its proximity to the border with the Republic of Ireland and the major port of Warrenpoint. It also recognises that Newry has the potential to cluster with Dundalk in the provision of services and functions. They are both strategically located on the

Belfast-Dublin corridor which has the potential to become a significant axis of development within the wider European context. This has provided the impetus for joint working to develop their roles as regional gateways and to develop the wider eastern seaboard corridor. A joined-up approach assists in creating a critical mass to compete in the global economy and will support efforts to attract funding for wider regional infrastructure and regeneration initiatives. Such an approach to the strategic planning of the cross border relationship of Newry-Dundalk will enable it to collectively promote the development of a twin centre sub-region and promote sustainable development. Developing two strong sustainable centres will play a key role in regeneration strategies, transport infrastructure and connectivity, economic development and job creation and in the delivery of services.

The RDS acknowledges the 'Memorandum of Understanding' (MOU) that exists between the Council and Louth County Council, which commits the region to increased cross border co-operation. The MOU underpins the pivotal role of the greater Newry region. It establishes a strategic alliance between the two bodies and seeks to support and promote the economic development and competitiveness of the region. This relationship will see both authorities work collaboratively together and share key services.

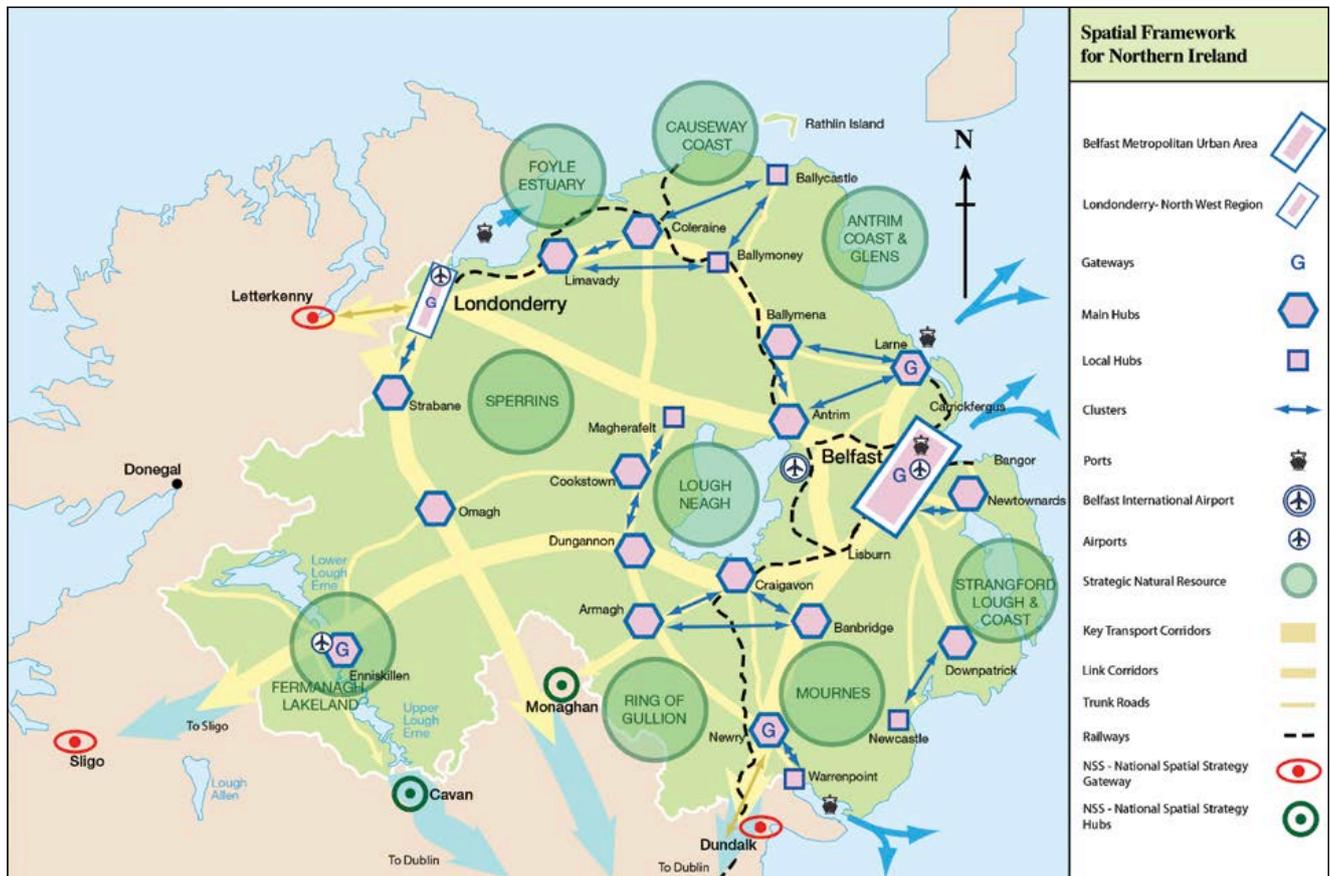
The RDS sets out guidance to identify and consolidate the roles and functions of settlements within the clusters, promote development opportunities at hubs and grow the population of hubs and cluster of hubs.

- **The Rural Area** - The district has a significant rural demographic. The RDS recognises that in order to sustain rural communities, new development and employment opportunities, which respect local, social and environmental circumstances are required. This means facilitating the development of rural industries, businesses and enterprises in appropriate locations and ensuring they are integrated appropriately within the settlement or rural landscape. The RDS also states that the expansion of rural tourism and associated development that is both sustainable and

environmentally sensitive should be encouraged. It also recognises that accessibility to services can be difficult in rural areas and that there are wider implications for both transport services and the provision of a core set of essential services. The RDS sets out guidance to sustain rural communities living in smaller settlements and the open countryside and improve accessibility for rural communities.

- Gateways and Corridors - Gateways are strategically important transport interchanges for economic development,

freight distribution and employment generation. The quality of connection from air and sea ports to the internal transport network is crucial for economic competitiveness and the convenience of the travelling public. Economic and social development depends on modern, efficient infrastructure. Placed on the Belfast-Dublin economic corridor and with its strategic transport links and sea port, Newry and Warrenpoint form the South Eastern City Gateway. The RDS sets out guidance to strengthen the gateways for regional competitiveness.



Map 3: The Regional Development Strategy Spatial Framework for Northern Ireland

Source: Regional Development Strategy 2035

## Regional and Local Policy Context

3

Regional and Local  
Policy Context

### Local Development Plan Regional Policy Context

#### Sustainable Development Strategy

**3.7** The Northern Ireland Executive's 'Everyone's Involved - Sustainable Development Strategy' (2010) sets out a vision of our society developing in a sustainable way aiming to build a future characterised by economic prosperity, equality and social cohesion; strong, confident communities and a high quality environment. It aims to put in place environmental measures to ensure that we can grow our economy, improve our society and utilise our natural resources in an environmentally sustainable manner. The delivery of the Strategy is based around six guiding principles:

- Living within environmental limits
- Ensuring a strong, healthy, just and equal society
- Achieving a sustainable economy
- Using sound science responsibly
- Promoting opportunity and innovation
- Promoting good governance.

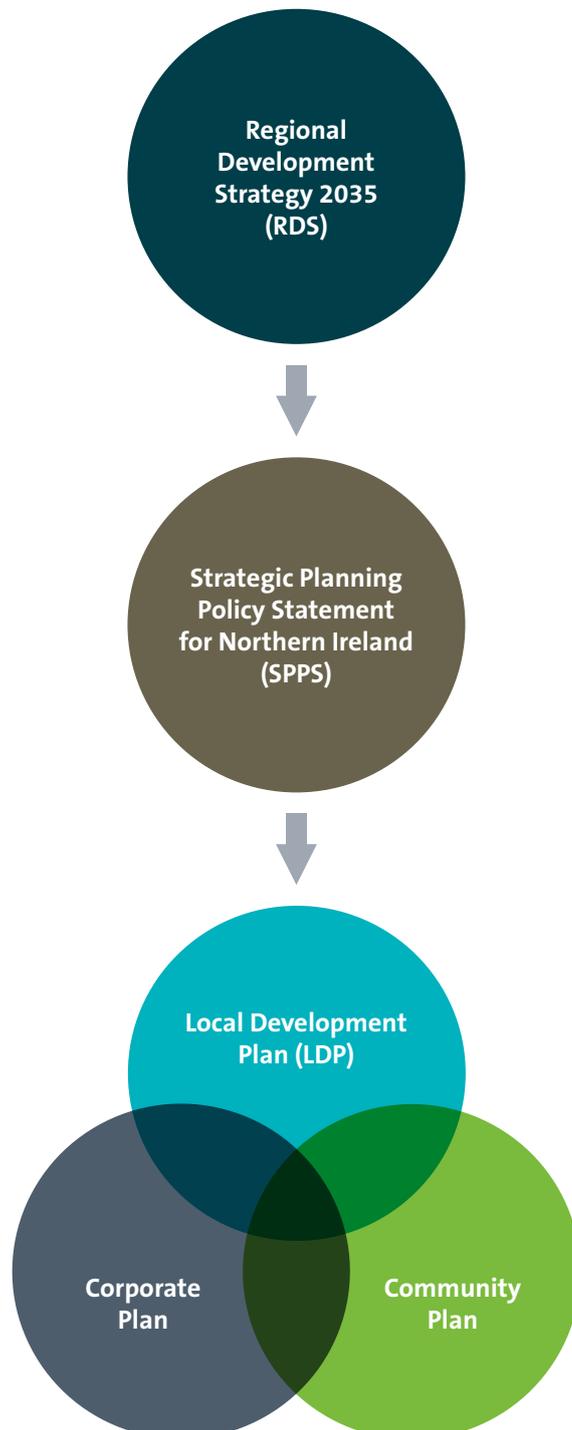


Figure 3: The Relationship between the Local Development Plan and Key Strategy Documents in the Regional and Local Policy Context

## Regional Transportation Strategy

**3.8** Regional transportation is addressed through ‘Ensuring a Sustainable Transport Future - A New Approach to Regional Transportation’ (2011). The Strategy complements the RDS and contains high level aims and strategic objectives to support the growth of the economy, enhance the quality of life for all and reduce the environmental impact of transport. It sets out a transportation vision to have a modern, sustainable, safe transportation system which benefits society, the economy and the environment and which actively contributes to social inclusion and everyone’s quality of life. The Strategy sets out the approach to regional transportation and is used to guide strategic investment decisions.

## Strategic Planning Policy Statement

**3.9** The SPPS (2015) is a statement of central government’s policy on important planning matters that should be addressed across NI. It provides a robust planning policy framework within which the Council will prepare the LDP and manage development. The provisions of the SPPS must be taken into account in the preparation of the LDP. The SPPS states that the preparation of LDPs and the process by which individual planning proposals are determined are key to furthering sustainable development, implementing the SPPS and realising the vision and aspirations of local communities. It highlights that when plan-making and decision-taking, planning authorities must balance and integrate a variety of complex social, economic, environmental and other matters that are in the long-term public interest.

**3.10** The SPPS outlines a number of core principles underpinning the reformed planning system in NI. These are:

- Improving health and wellbeing
- Creating and enhancing shared space
- Supporting sustainable economic growth
- Supporting good design and positive place-making
- Preserving and improving the built and natural environment.

**3.11** The SPPS consolidates the existing suite of strategic subject planning policies into a single document. It provides a planning policy framework within which the Council will bring forward detailed operational policies in the LDP. These will replace the

existing PPSs and the remaining provisions of the PSRNI which will cease to have effect in the district when the Council adopts its Plan Strategy. The SPPS sets out regional strategic objectives and regional strategic policies by subject area and guidance on how these are to be delivered through the LDP process.

**3.12** In 2016 DfI launched two reviews of strategic planning policy contained within the SPPS. The reviews are being undertaken for ‘Development in the Countryside’ and ‘Renewable Energy’. The outcomes of these reviews are pending. Any necessary revisions of strategic planning policy contained in the SPPS as a result of these reviews, or any subsequent review, will be taken into account in the preparation of the LDP.

## Planning Policy Statements and a Planning Strategy for Rural Northern Ireland

**3.13** In accordance with the SPPS the existing suite of PPSs, which currently provide regional operational planning policy across a range of subject areas and the remaining provisions of the PSRNI will cease to have effect in the district once the Council adopts its Plan Strategy. Until that time, these policies will be retained under a transitional arrangement. Any relevant supplementary and best practice guidance will also continue to apply.

**3.14** A preliminary review of operational planning policy has been carried out to inform the POP. A more detailed policy review will be carried out in advance of the Plan Strategy.

## Supplementary Planning Guidance

**3.15** A wide range of supplementary planning guidance supports the regional policy contained in the PPSs. These include:

- Living Places - An Urban Stewardship and Design Guide for Northern Ireland (2014)
- Building on Tradition - A Sustainable Design Guide for the Northern Ireland Countryside (2012)
- Creating Places - Achieving Quality in Residential Developments (2000)
- Best Practice Guidance to Planning Policy Statement 18: Renewable Energy
- Development Control Advice Notes.

## Regional and Local Policy Context

# Local Development Plan Local Policy Context

### Existing Development Plans

**3.16** The existing development plans that apply to the district are:

**Banbridge/Newry and Mourne Area Plan 2015 (BNMAP)**  
[adopted October 2013]

**Ards and Down Area Plan 2015 (ADAP)**  
[adopted March 2009]

**3.17** These existing plans will remain in force as the statutory development plans for the district until such time as they are replaced by the **Newry, Mourne and Down Local Development Plan 2030** when it is adopted. They provide the current local planning framework against which to assess development proposals and the starting point for the review of spatial planning options for the LDP.

### Links with Council Strategies

**3.18** The LDP will play a key role in the articulation of a number of the Council's primary strategies.

### Newry, Mourne and Down District Council: Corporate Plan 2015-2019

**3.19** The Council's mission as detailed in its Corporate Plan 2015-2019 is:

**"To lead and serve a district that is prosperous, healthy and sustainable"**

**3.20** In being true to this mission and in realising the long-term vision for the development of the district, the Corporate Plan sets out a number of strategic objectives as its priorities, including five which the LDP will have an integral part in successfully achieving:

- Becoming one of the premier tourism destinations on the island of Ireland
- Attracting investment and support the creation of new jobs
- Supporting improved health and wellbeing outcomes
- Protecting our natural and built environment
- Leading the regeneration of our urban and rural areas.

### Community Plan - Living Well Together (2017)

**3.21** The Local Government Act (Northern Ireland) 2014 introduces a statutory link between the Community Plan and the LDP, in that the LDP must take account of the Community Plan for the Council area and its communities and set the long-term social, economic and environmental objectives for the district. The Council, as the lead partner in the community planning process, works to create a long-term vision for the social, economic and environmental wellbeing of the district and its citizens, in partnership with the community and service providers in the area. The Council's Community Plan 'Living Well Together: A Community Plan for Newry, Mourne and Down to 2030' was published in 2017. The aim of the Community Planning Partnership is that this becomes the overarching strategic plan for the integrated planning and delivery of services for the district.

**3.22** It is intended that the LDP will be the spatial reflection of the Community Plan, thereby linking public and private sector investment through the land use planning system. Work on the LDP to date has sought to ensure that it is working towards the same shared vision as the Community Plan, to address key issues and needs in the district and support the outcomes, priority areas and activities of the Community Plan.

### Tourism Strategy for 2017-2021

**3.23** The first strategic objective of the Council's Corporate Plan is that the district becomes one of the premier tourism destinations on the island of Ireland. The Tourism Strategy recognises that the sustainable growth of tourism will be a function of an integrated approach and that a collaborative internal local government approach is critical to the implementation of the Strategy. In delivering the Strategy, one of its three goals is ensuring that the development is undertaken sustainably and contributes to the enhancement of social, cultural and environmental values.

## Economic Regeneration and Investment Strategy 2015-2020

**3.24** The Strategy's mission aims for the district to be recognised as a vibrant, dynamic and connected region of enterprise and economic growth; a place of sustainable natural beauty and a premier tourist destination, encompassing excellence in culture and arts and enabling and creating opportunities for all. The Strategy identifies a number of strategic priorities and actions developed around five themes:

- Economic development
- Tourism development, marketing, promotion and events
- Urban development and regeneration
- Rural development and regeneration
- Arts, culture and heritage.

## Other Plans and Strategies

**3.25** The LDP has to have regard to other relevant plans, policies and strategies (current and emerging) relating to the district or that of any adjoining local authority at international, regional and local level. This will include any future amendment, revision, updating or replacement of current strategy documents.

**3.26** The Council has produced a number of other strategy documents. These include a Play Strategy, Sports Facility Strategy and Masterplans for Newry City Centre, Downpatrick Town Centre, Ballynahinch Town Centre and the South East Coast.

**3.27** Given the district's border with the Republic of Ireland, cross border co-operation and the role of the greater Newry region, reference is also made to the Irish Government's strategic development framework.

## Project Ireland 2040 - National Planning Framework

**3.28** Similar to the RDS, 'Project Ireland 2040 - National Planning Framework' (NPF) (2018) represents the Republic of Ireland's strategic development framework. Newry, Mourne and Down district shares a land and sea border with the Republic of Ireland. It borders both County Louth and County Monaghan. The NPF seeks to address the shared challenges it has with NI. In doing so it includes a number of specific national policy objectives outlining a collaborative approach to build and develop this relationship in the strategic planning and development of both Ireland and NI.

**3.29** Several of the national policy objectives within the NPF document outline a collaborative approach with NI. These are largely based around three key areas; working together for economic advantage, co-ordination of investment in infrastructure and managing our shared environment responsibly.

**4** Plan Vision and Strategic Objectives



Slieve Bearnagh



St John's Point, Killough

## 4. Plan Vision and Strategic Objectives

**4.1** The Council's vision for the district is set out in the Community Plan. Given the statutory link and that the LDP should be the spatial reflection of the Community Plan the LDP shares its vision:

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**Newry, Mourne and Down is a place with strong, safe and vibrant communities where everyone has a good quality of life and access to opportunities, choices and high quality services which are sustainable, accessible and meet people's needs.**

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### Supporting the Community Plan's Outcomes, Priority Areas and Activities

**4.2** The Council's Community Plan contains five key outcomes:

- All people in Newry, Mourne and Down get a good start in life and fulfil their lifelong potential
- All people in Newry, Mourne and Down enjoy good health and wellbeing
- All people in Newry, Mourne and Down benefit from prosperous communities
- All people in Newry, Mourne and Down benefit from a clean, quality and sustainable environment
- All people in Newry, Mourne and Down live in respectful, safe and vibrant communities.

**4.3** Delivery of these outcomes will be achieved via district wide Delivery Plans taken forward by four thematic groups. These Thematic Delivery Plans identify a range of priority areas and associated key activities. The linkages to the LDP are primarily contained within the Environment and Spatial Development thematic group. The LDP as a spatial reflection of the Community Plan can provide support for the following key priority areas and activities within the relevant thematic group:

#### **Priority Areas (Environment and Spatial Development)**

- Reduce impact of and mitigate against flooding
- Increase and enhance access to natural and built heritage
- Protecting, enhancing and benefitting from environmental assets
- Reduce the level and impact of traffic and congestion
- Reduce the impact of waste
- Increase production and usage of energy from sustainable sources
- Provide access to quality housing.

## Plan Vision and Strategic Objectives

### Local Development Plan Supporting the Community Plan's Outcomes, Priority Areas and Activities

#### Activities (Environment and Spatial Development)

- Ensure flood mitigation and prevention is incorporated within the LDP including promoting 'soft' engineering methods
- Investigate and identify sustainable drainage opportunities
- Promote and support community resilience measures within identified flood risk areas
- Increase recognition of local green space
- Increase promotion of both green and blue infrastructure
- Promote and enhance access to our built and natural assets
- Promote the development and implementation of green infrastructure schemes
- Explore opportunities to enable and encourage more people to use public transport (eg through park and ride/share schemes)
- Support the prioritisation of three road schemes on a NI wide basis:
  - Newry Southern Relief Road
  - Ballynahinch By-pass
  - A7 Saintfield Road
- Reduce congestion in the district's key tourism sites.

**4.4** In addition, a number of activities within the Economic Development, Regeneration and Tourism Delivery Plan have land use connections and link with the LDP.

#### Activities (Economic Development, Regeneration and Tourism)

- Support existing business to grow and develop in indigenous and export markets, including a focus on those in the five key areas of aerospace, life and health sciences, agri-food, digital and advanced manufacturing and advanced materials
- Support the start-up and growth of social enterprises in the district
- Encourage and support business start-ups in the district
- Identify the potential for economic development and regeneration through the mapping/better utilisation of public sector land
- Ensure the LDP promotes economic development and regeneration across the whole district
- Maximise the potential of vacant land holdings in our area.

# Local Development Plan

## LDP Strategic Objectives

**4.5** The LDP will seek to deliver the above shared vision and address the highlighted Community Plan's priority areas and activities through the following social, economic and environmental themes and associated objectives.

### Social

#### Accommodating People, Improving Health and Wellbeing

- To further develop Newry City as a regional gateway city and Downpatrick as a main hub within the district
- To protect and sustain the role of local towns and villages so that they act as local centres for shops and community services meeting the daily needs of their rural hinterland
- To provide for vital and vibrant rural communities, whilst protecting the countryside in which they live by accommodating sustainable growth
- To accommodate 15,092 new homes by 2030 in a range of housing designed to meet the district's housing need
- To support the regeneration of disadvantaged and deprived areas
- To recognise the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities
- To facilitate the development of new community facilities at locations accessible to the communities they serve, through a variety of modes of transportation
- To protect and enhance the provision of open space across the district to support health and wellbeing
- To provide for quality public spaces and 'shared spaces' that are accessible to all.

### Economic

#### Creating Jobs and Promoting Prosperity

- To facilitate the creation of 9,213 new jobs, by 2030 at a variety of locations where they are accessible to all members of the community, including those without a private car
- To recognise and accommodate entrepreneurship and innovation for large, medium and small firms by attracting new firms and accommodating new and expanding indigenous business

- To facilitate Newry to capitalise on its role as the South Eastern City Gateway, on the Belfast-Dublin economic corridor, whilst similarly maximising Warrenpoint as a local hub and major port
- To support the district as a major tourist destination whilst respecting its heritage assets, and exceptional landscape setting.

#### Supporting the Transportation Network and Other Infrastructure

- To promote integration between transportation and new development so as to reduce the need to travel and reduce dependency upon travel by car
- Promote opportunities for sustainable travel including walking, cycling, and public transport and reduce the need to travel by private car
- To protect strategically important transportation routes
- To support renewables infrastructure whilst affording protection to the environment
- To support digital connectivity which meets the needs of business and private households while reducing the need to travel
- To manage mineral resources in a sustainable manner
- Accommodate investment in public utilities and waste management.

### Environmental

#### Protecting and Enhancing the Environment

- Protect and enhance the environment to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and wellbeing
- To protect our built heritage assets and promote their sensitive re-use
- To conserve our Conservation Areas and Areas of Townscape Character as important assets
- To protect our sensitive upland landscapes from inappropriate development
- To reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding or coastal erosion.

5 Spatial Growth Strategy



Newry

Newcastle

# 5. Spatial Growth Strategy: Promoting Urban Centres and Supporting Sustainable Rural Development

**5.1** The Regional Development Strategy 2035 (RDS) identifies a hierarchy of settlement types and provides spatial framework guidance which plays a key role in influencing the future distribution of development across the district. Our proposed spatial growth strategy reflects this guidance and is supported and underpinned by the settlement hierarchy, strategic housing and employment land allocations considered within this chapter.

**5.2** As previously highlighted the district's population is projected to grow by 9.7% to 194,994 between 2016 and 2030, with an associated 13.6% increase in households to 74,086 by 2030. The LDP therefore needs to ensure that the provision of housing and economic development land will support this growth in a sustainable way.

**5.3** Our proposed spatial growth strategy will seek to achieve the RDS objectives of promoting growth and economic development opportunities in the Regional Gateway city of Newry and main hub of Downpatrick. The district's main city and town will accommodate major economic development and residential development schemes. City and town centres will be supported through retail, office and mixed-use development. The Plan will seek to maximise the benefits arising from their strategic location on key transport corridors and Newry's gateway status.

**5.4** Towns will provide opportunities for smaller economic development proposals, retailing and services and residential development. Villages will be sustained through the use of flexible plan designations supporting appropriately sized residential and employment opportunities. They will continue to function as important service centres meeting the daily needs of the rural area. Small settlements will act as a focal point for the rural community and will afford opportunities for single dwellings and other developments through infilling or small scale rounding-off of the development limit.

**5.5** Within the open countryside single dwellings will be managed and facilitated in a manner to strike a balance between the need to protect the countryside from unnecessary or inappropriate development while supporting rural communities. Within the Strategic Housing Land Allocation section a number of options are considered for accommodating housing in the countryside and their implications for the spatial growth across the district highlighted. Our spatial growth strategy also seeks to support rural economic development and this is further underpinned by key issues which consider support for small scale rural enterprises, enhancement of tourism infrastructure, protecting our natural assets and sustaining our minerals industry.

Spatial Growth Strategy:  
Promoting Urban Centres and Supporting Sustainable Rural Development

# Key Issue 1 Settlement Hierarchy

## Regional Policy Context

5.6 A successful growth strategy must be based on the foundation of a settlement hierarchy which supports and sustains local communities and is in line with the RDS Regional Spatial Framework. In guiding future development of the region, the RDS identifies a hierarchy of settlements based on main and local hubs coupled with a strong rural community living in either small towns, villages, small settlements or the open countryside. At a district level the RDS recognises Newry and Downpatrick as hubs while also acknowledging that these settlements have the potential to cluster with Warrenpoint and

Newcastle respectively. Newry is also identified as a gateway due to its strategic location along the Belfast-Dublin corridor.

5.7 To aid this process the RDS provides a hierarchy of settlements and related infrastructure wheel (see Figure 4) which outlines the patterns of service provision that are likely to be appropriate at different spatial levels including villages, smaller towns, regional towns and principal cities. The model also recognises the strong relationship between settlement size and the levels of service that can be supported which is a key consideration in establishing a settlement hierarchy.

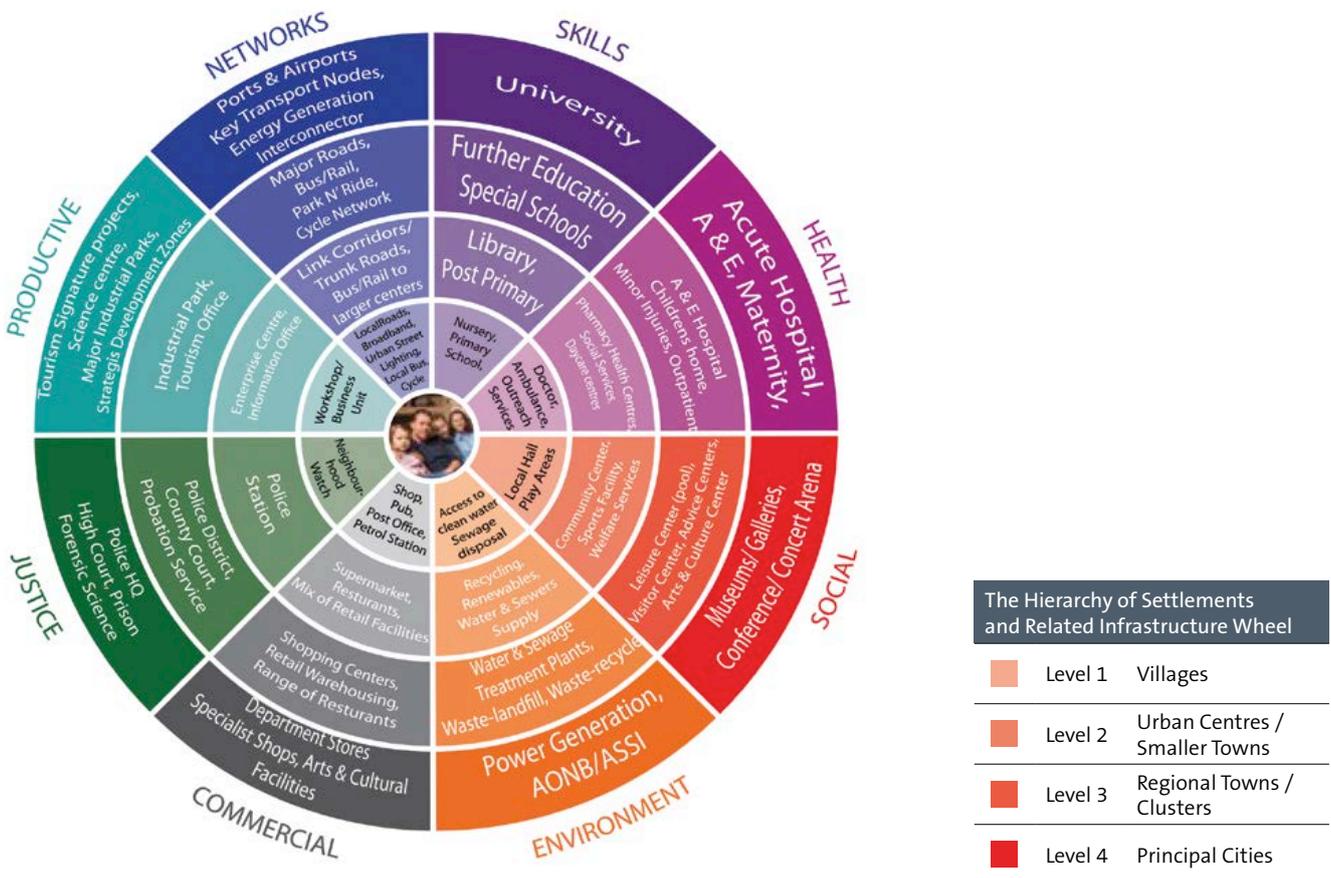


Figure 4: The Hierarchy of Settlements and Related Infrastructure Wheel

Source: Regional Development Strategy 2035

**5.8** The SPPS contains little information in relation to the identification of a settlement hierarchy. It focuses on the need for options for planned growth in major settlements, the need to bring previously developed land forward for redevelopment to assist in regeneration, creating more attractive environments and reducing the use of greenfield land. It also highlights the importance of protecting existing areas of open space to promote wellbeing through facilitating play and sport.

## Local Context

**5.9** The purpose of the settlement hierarchy is to establish the broad principles of the development appropriate to each tier within the hierarchy. Both extant area plans for the district established a settlement hierarchy upon which future development or growth was to be based. The approach taken in developing the settlement hierarchy within both plans was comparable. A four tier system was adopted within the BNMAP to accommodate Newry City while the ADAP settlement hierarchy consisted of a three tier system. Both plans have incorporated similar terminologies when describing the different tiers of development and the 88 settlements located within the district. Table 1 indicates the existing settlement hierarchy within the district with the current hierarchy summarised below.

**5.10** In the ADAP, 3 towns were designated, Ballynahinch, Newcastle and Downpatrick, along with 14 villages and 22 small settlements equating to a total of 39 settlements.

**5.11** With regards to the settlement hierarchy within the BNMAP, Newry was identified as a city, Crossmaglen, Kilkeel, Newtownhamilton and Warrenpoint/Burren were designated as towns while a further 14 villages and 30 small settlements were designated equating to a total of 49 settlements.

**5.12** One of the guiding principles of the Community Plan is to support a sustainable approach to development which can be supported by a settlement hierarchy which helps inform the future distribution of development across the district.

## Spatial Growth Strategy:

### Promoting Urban Centres and Supporting Sustainable Rural Development

Table 1: Existing Settlement Hierarchy and Populations as per Current Area Plans

Settlement Hierarchy	Newry, Mourne & Down Settlement Populations		
Tier 1 City & Main Town	Newry (26,893)		
	Downpatrick (10,874)		
Tier 2 Local & Small Towns	Newcastle (7,743)	Ballynahinch (5,715)	
	Warrenpoint/Burren (8,721)	Crossmaglen (1,608)	
	Kilkeel (6,521)	Newtownhamilton (800)	
Tier 3 Villages	Saintfield (3,406)	Drumaness (1,344)	Forkhill (498)
	Killyleagh (2,928)	Camlough (1,081)	Strangford (495)
	Castlewellan (2,792)	Mayobridge (1,068)	Jonesborough (465)
	Rostrevor (2,788)	Killough (843)	Ballykinler (447)
	Bessbrook (2,739)	Meigh (770)	Shrigley (437)
	Crossgar (1,892)	Annsborough (767)	Cullyhanna (326)
	Annalong (1,796)	Ballyholland (664)	Clough (279)
	Hilltown (1,698)	Mullaghbane (596)	Attical (171)
	Ardglass (1,643)	The Spa (583)	
	Dundrum (1,551)	Ballymartin (506)	
Tier 4 Small Settlements	Darragh Cross (490)	Maghera (211)	Saul (97)
	Newtowncloghoge (457)	Burrenbridge (199)	Ballymaderphy (69)
	Ballyhornan (369)	Kilclief (191)	Coney Island (57)
	Belleek (375)	Clonvaraghan (186)	Altnamacken ***
	Whitecross (352)	Drumaroad (183)	Ballymoyer ***
	Drumintee (337)	Lislea (180)	Ballyward ***
	Kilcoo (335)	Ballynoe (169)	Carrickinab ***
	Sheeptown (333)	Glassdrumman, Co Armagh (165)	Chapelstown ***
	Annacloy (318)	Dunnaval/Ballyardle (161)	Dechomet ***
	Raholp (315)	Glen (147)	Derryboye ***
	Kilmore (310)	Longstone (147)	Dorsey ***
	Bryansford (306)	Barnmeen (136)	Drumaghlis ***
	Lurganare (294)	Ballyalton (132)	Finnis ***
	Seaforde (263)	Mullaghglass (125)	Greencastle ***
	Cullaville (232)	Leitrim (121)	Jerrettspass ***
	Killowen (230)	Silverbridge (112)	Tullyherron ***
	Creggan (227)	Glassdrumman/Mullartown (110)	
Loughinisland (218)	Kileen (108)		

Source: Headcount and Household Estimates for Settlements in Northern Ireland published 26/03/2015  
<http://www.nisra.gov.uk/census/2011/results/settlements.html>

\*\*\* Output has been confined to those settlements exceeding the thresholds of 20 or more households and 50 or more usual residents.  
 Total Population of Newry, Mourne & Down District Council area 2011 - 171,533  
 Total Population of Down District Council area 2011 - 69,731  
 Total Population of Newry & Mourne District Council area 2011 - 99,480  
 Source: (NI Census 2011 Key Statistics Summary Report September 2014)

## Local Development Plan Key Issue 1 - Settlement Hierarchy

**5.13** A successful growth strategy must be based on a settlement hierarchy which is appropriate for the district while recognising the guiding principles outlined within the RDS. The hierarchy must ensure that the district is a sustainable place to both live and work by integrating housing, employment and other important services and facilities which will aid the future growth of the district.

**5.14** Each of the district's 88 existing settlements have been appraised and evaluated against the 2011 Census data, the six tests of the 'Housing Evaluation Framework' and the 'Hierarchy of Settlements and Related Infrastructure Wheel' as outlined in the RDS, together with the information detailed within the Northern Ireland Statistics and Research Agency (NISRA) document 'Review of the Statistical Classification and Delineation of Settlements'. This information has enabled an overview of the services, facilities, physical infrastructure and environmental characteristics of each settlement to be compiled.



Map 4: Existing Settlement Hierarchy

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Local Development Plan

## Key Issue 1 - Settlement Hierarchy

**5.15** Following this review a revised settlement hierarchy has been brought forward for consideration at the preferred options stage and is detailed within Table 2. The alignment and evaluation of the extant area plan hierarchies has resulted in the proposed reclassification of some settlements. Of the 88 settlements within the existing hierarchy the majority of settlements have remained within their existing classification. The evaluation confirms Newry City and Downpatrick as the main hubs within the district taking into account their level of service provision, potential for growth and population size. Other recommendations proposed within the settlement hierarchy are for:

- Newtownhamilton to be reclassified from Tier 2 to Tier 3
- Saintfield, Killyleagh, Castlewellan and Bessbrook to be reclassified from Tier 3 to Tier 2
- The Spa, Shrigley and Attical to be reclassified from Tier 3 to Tier 4
- Warrenpoint/Burren to be considered as separate settlements within the settlement hierarchy, with Warrenpoint retained in Tier 2 and Burren included in Tier 3.



Table 2: Proposed Settlement Hierarchy and Populations for the District

Settlement Hierarchy	Newry, Mourne & Down Settlement Populations		
Tier 1 City & Main Town	Newry (26,893)		
	Downpatrick (10,874)		
Tier 2 Local & Small Towns	Newcastle (7,743)		
	Warrenpoint (7,475)		
	Kilkeel (6,521)		
	Ballynahinch (5,715)		
	Saintfield (3,406)		
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	Crossmaglen (1,608)		
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	Drumaness (1,344)	Ballymartin (506)	
	Burren (1,246)	Forkhill (498)	
	Camlough (1,081)	Strangford (495)	
	Mayobridge (1,068)	Jonesborough (465)	
	Tier 4 Small Settlements	The Spa (583)	Loughinisland (218)
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Annacloy (318)		Dunnaval/Ballyardle (161)	Derryboye ***
Raholp (315)		Glen (147)	Dorsey ***
Kilmore (310)		Longstone (147)	Drumaghlis ***
Bryansford (306)		Barnmeen (136)	Finnis***
Lurganare (294)		Ballyalton (132)	Greencastle ***
Seaforde (263)		Mullaghglass (125)	Jerrettspass ***
Cullaville (232)		Leitrim (121)	Tullyherron***
Killowen (230)		Silverbridge (112)	
Creggan (227)		Glassdrumman / Mullartown (110)	

■ Reclassification of settlement to higher tier

■ Reclassification of settlement to lower tier

■ Separation of settlement from Warrenpoint

Source: Headcount and Household Estimates for Settlements in Northern Ireland published 26/03/2015  
<http://www.nisra.gov.uk/census/2011/results/settlements.html>

\*\*\* Output has been confined to those settlements exceeding the thresholds of 20 or more households and 50 or more usual residents.  
 Total Population of Newry, Mourne & Down District Council area 2011 - 171,533  
 Total Population of Down District Council area 2011 - 69,731  
 Total Population of Newry & Mourne District Council area 2011 - 99,480

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Options for Settlement Hierarchy

## Option 1

**To retain the settlement hierarchy as set out within the existing Area Plans with no adjustments or amendments proposed.**

The existing settlement hierarchy (as identified through the existing Area Plans) provides the district with a range of settlements for both the urban and rural populations. In adopting Option 1 as the preferred option there would be no change to the settlement hierarchy.

This option restricts the ability to review the existing settlement hierarchy in its current format and to assess whether any settlements are now inappropriately classified subject to the amount of growth or decline experienced within each settlement.

## Option 2

**To re-examine the existing settlement hierarchy in order to identify if any settlement should be reclassified based on their function and range of services.**

This would provide the scope to redesignate particular settlements based on anticipated levels of growth, subject to the standards set out in the RDS 'Hierarchy of Settlements and Related Infrastructure Wheel'.

Option 2, as outlined above, could be described as transitional and planning for future generations by working towards boosting access and improving the quality of life for the residents of the district. In order to achieve these aims it is proposed to uplift a number of 'intermediate settlements', which provide a strong level of service provision and have a population of between 2,500 and 5,000 to the towns classification. In elevating these settlements to Tier 2 it is envisaged that the role and function of these settlements will grow to include a stronger retail base, provide additional employment and strengthen the number of community services provided while affording opportunities to reinforce the associated physical infrastructure.

This option would also provide an opportunity to review settlements, this may include reclassifying any settlements which do not appear to have seen appropriate growth or offer little in the way of service provision.

## Option 3

**To re-examine the existing settlement hierarchy in order to consider if any settlement should be reclassified while also considering the potential for identifying a number of new small settlements.**

Under this option consideration would also be given to declassifying small settlements where it was considered that they have no discernible service function or focal point for the rural community.

Option 3 offers the same benefits as Option 2 seeking balanced growth across the towns, villages and small settlements reflective of their size and scale to allow communities to be sustained, consolidated and revitalised while also recognising the strategic importance of Newry and Downpatrick as the main centres for future growth.

However, given the emphasis on sustainable development in the countryside, Option 3 would still provide opportunities for new dwellings and other developments sufficient to meet local needs and support rural communities and services. Through the possibility of increasing the number of small settlements within the district, these localities would see a change in policy direction from rural to urban.

It should be noted however that for a cluster of development to be considered for small settlement designation it will need to display a sense of cohesion and place, and offer one or more community facility. The PAC has clearly indicated that a grouping of houses alone is not considered sufficient basis for designation as a settlement. In their report into the draft Northern Area Plan 2015 they stated, "An agglomeration of houses in the open countryside or several nodes of houses without accompanying services or community facilities is not, to our mind, a sustainable basis for conferring hamlet status".

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that overall, Option 3 is considered to be the most sustainable option. Options 2 and 3 both received the same pattern of scoring but Option 3 delivers slightly more than Option 2 for the social and economic sustainability themes.

The evidence-based review under Option 3 allows development to be directed to appropriate locations which have the capacity to absorb an increase in population and maintains efficient land use.

The absence of an evidence-based review under Option 1 means that this option performs less positively than Options 2 and 3 against the objectives.

Preferred Option:

## Option 3

### Justification

Option 3 is considered the Council's preferred option as it enables a full review of all settlements across the four settlement tiers. It also considers the potential for identifying a number of new small settlements and thus offers the greatest scope to underpin the Council's growth strategy.



- Q Do you agree with the Council's preferred option for the settlement hierarchy? If not, why?**
- Q Do you agree with the revised settlement hierarchy as proposed in Table 2? If not, why?**
- Q Are there other options the Council should consider?**
- Q Are there any identifiable clusters of development that should be considered for designation as a small settlement? If so, why?**
- Q Are there any existing small settlements that should be declassified? If so, why?**

**Spatial Growth Strategy:**

Promoting Urban Centres and Supporting Sustainable Rural Development

# Strategic Housing Land Allocation

## Key Issue 2

### Quantity of Housing Land

#### Regional Policy Context

**5.16** The Department for Infrastructure (Dfi) formerly the Department for Regional Development (DRD) is the government body responsible for both the production of the RDS and the associated Housing Growth Indicators (HGIs). The RDS sets down HGIs for each council district in NI over an extended period as part of a plan, monitor and manage mechanism to ensure the timely release of development land. The HGIs provide an estimate for the new dwelling requirement and provide a guide for allocating housing distribution across the plan area. The indicator covers both urban and rural housing.

**5.17** In April 2016 DRD published revised HGIs providing an estimate of the new dwelling requirement for the region from 2012-2025. The HGI for the district for this period has been set at 10,900. When this figure is projected to the end of the plan period (2030) the figure for the district is 15,092 (see table 3 below).

Table 3: Department for Infrastructure  
Housing Growth Indicator Allocation

HGI Period	Newry, Mourne and Down District Council HGI Allocation
Previous HGI 2008 - 2025	22,750 (12,250 for Newry & Mourne and 10,500 for Down)
Revised HGI 2012 - 2025	10,900
Per Year/Pro Rata Figure	838.4
Projected HGI to end LDP period 2012-2030 (Pro rata x 18 years)	15,092

#### Local Context

**5.18** The most up to date housing monitor information for the district relates to the period up to the 31 March 2016. The potential housing provision from committed sites (still to be developed) and zoned sites together with completed sites (developed since the start of the HGI period – April 2012) stood at 14,533<sup>1</sup> units across the district on the 1 April 2016. This represents 96% of the HGI allocation for the plan period. This allocation does not include any allocation for housing in the countryside, when past approvals are taken into consideration then a further 3,532 units (based on an approval rate of 196 per annum) could potentially be delivered under current planning policy<sup>2</sup>. Thus available housing land and current planning policy has the potential to deliver 18,065 units over the plan period.

**5.19** To determine whether the HGI figure will act as a constraint on growth an examination of potential housing need has been undertaken using two methodologies based on household projections and past growth rates.

- The potential units required over the plan period can be calculated by taking the NISRA 2012-37 household projections. These figures, which take account of population growth, a falling average household size and the changing age structure of the population, suggest the number of households across the district could increase by approximately 11,258 households between 2012 and 2030. This figure is more than 3,800 below the projected HGI figure.
- Alternatively, historical growth can provide an indication of future housing needs. For the 10 year period between the 2001 and 2011 Census, the number of households across the district grew from 52,280 to 61,998 (an overall increase of 9,718 or 972 per annum). If this growth rate is applied to the period 2012-2030 (18 years) the number of additional households created would be 17,496, which is 2,404 units above the projected HGI figure.

<sup>1</sup> Committed sites and zoned sites account for 13,546 units while completed sites account for 987 units.

<sup>2</sup> Policy for Housing in the Countryside is considered further under Chapter 6, Key Issue 6.

**5.20** Even if the growth in households over the plan period reflected the historical growth over the 2001-2011 period the current provision of urban housing land and potential for housing in the countryside, through the existing rural planning policy Planning Policy Statement 21: Sustainable Development in the Countryside (PPS21), could result in the delivery of up to 18,065 units, which would still exceed need by 569 units.

**5.21** Taking all potential housing provision within settlements and the open countryside into account there is the potential for housing provision to exceed the district's HGI by 20%. The Council is aware of the need to protect housing land supply and build confidence in the local housing market and therefore propose to retain existing housing zonings on committed housing sites.

**5.22** The need for the remaining zoned housing sites across the district, and their potential for delivery will be assessed as part of a full review of zoned housing lands. A phased approach to the release of housing will be introduced as part of this review and surplus zoned housing land will be held in reserve to meet the longer-term housing needs of that settlement. Currently only Downpatrick has a two phased approach to housing land. The introduction of a phased approach on a district wide basis will allow for a sustainable approach to the release of housing land following the plan, monitor and manage direction of the RDS.

**5.23** At a district wide level there would therefore appear to be more than sufficient housing land to meet the district's housing need over the Plan period. It will however be necessary to determine how the housing allocation should be distributed across all the settlement tiers and the open countryside (this is further considered under Key Issue 3). Later in the Plan process following completion of urban capacity studies it will be necessary to assess how housing land should be distributed between settlements within each tier.

**Spatial Growth Strategy:**

Promoting Urban Centres and Supporting Sustainable Rural Development

# Option for the Quantity of Housing Land

## Option 1

**Retain the current level of zoned housing land.**

Provision from committed sites and zoned sites together with completed sites represents 96% of the district's HGI for the Plan period (excluding housing in the countryside). A full review of all housing land, including the potential for delivery will be undertaken. A phased approach to the release of housing land would be introduced with surplus zoned land held in reserve to meet long-term housing need.



## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that this option scores positively for all of the social and economic sustainability options. Negative aspects such as land losses and associated reductions in biodiversity and natural resources can be mitigated to a degree through key site requirements by directing new development toward brownfield sites and avoiding or conserving areas with high biodiversity value. The phased approach to releasing land is more sustainable, as it means that settlement growth should be proportionate and matched with the pace of developing new services and infrastructure to sustain and support an increased population.

### Preferred Option:

## Option 1

### Justification

Option 1 is seen as a balanced approach that will ensure an orderly release of housing land without the need to de-zone land and the subsequent market uncertainty that this would bring. This option would also enable lands held in reserve to be brought forward should any subsequent review of the HGIs for the district result in an uplift to the HGI allocation.



**Q** Do you agree with the Council's preferred option in taking account of the HGI for the district and existing commitments that there is sufficient housing land at a district wide level to meet the district's housing needs to 2030? If not, why?

**Q** Do you agree with the Council's proposed phased approach, whereby surplus housing lands are held as a longer-term land reserve? If not, why?

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Key Issue 3 Distribution of Housing Land

## Regional Policy Context

**5.24** The RDS states that the allocation of housing growth to specific locations in a district is a matter for decision through the development plan process.

**5.25** Housing allocations within the district will be informed by the following, in line with the requirements of the SPPS:

- RDS HGIs
- RDS Housing Evaluation Framework
- An allowance for housing commitments based on the Council's housing monitor data
- An allowance for windfall housing within settlements
- Application of a sequential approach
- Consideration of housing need as identified through the Northern Ireland Housing Executive (NIHE) annual housing needs assessment.

**5.26** The LDP is thus the main vehicle for assessing future housing land requirements and managing housing growth to achieve sustainable patterns of residential development. The LDP will seek to support the delivery of housing for the district through the distribution of the new housing allocation.

## Local Context

**5.27** The LDP annual housing monitor provides an overall picture of the amount of land that has been developed on zoned housing land and the potential housing yield from live planning permissions on unzoned lands within main<sup>3</sup> settlements. Table 4 provides details of the remaining zoned land and potential number of units across the district as of the 1 April 2016.

Table 4: Housing Land Available across the District as of the 1 April 2016

Settlement Hierarchy	Area Remaining (Hectares)	Remaining Potential (Units)
<b>Hub Tier</b>		
Newry	130.65	3,089
Downpatrick	114	2,245
<b>Town Tier</b>		
Newcastle	24.6	643
Warrenpoint	23.34	539
Kilkeel	38.6	827
Ballynahinch	57.7	1,283
Saintfield*	8.4	172
Killyleagh*	13.7	292
Bessbrook*	7.87	331
Castlewellan*	5.6	120
Crossmaglen*	13.39	288
<b>Villages Total</b>	<b>132.66</b>	<b>2,589</b>
<b>Small Settlements Total</b>	<b>59.54</b>	<b>1,128</b>
<b>Newry, Mourne and Down Total</b>	<b>630.05</b>	<b>13,546</b>

\*Proposed towns under revised settlement hierarchy

<sup>3</sup> Hub and town tier.

**5.28** A review of existing uncommitted zonings in the adopted plans will be undertaken as part of the LDP preparation, to determine if their delivery is realistic and if it would be appropriate to carry them forward as zonings in the LDP. This exercise will also assist in establishing if, in light of the position relating to the HGI allocation, the zoning of additional lands for housing should be considered.

**5.29** At this stage in the LDP process it is not appropriate to set out the precise housing allocation for each settlement. The allocation to each settlement will be set out in the draft Plan Strategy, taking account of the size of the settlement, the availability of services and facilities and its environmental capacity. It is appropriate however at this stage to consider how housing should be distributed across the various settlement tiers and the open countryside. Three options for housing distribution across the district are set out below.

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

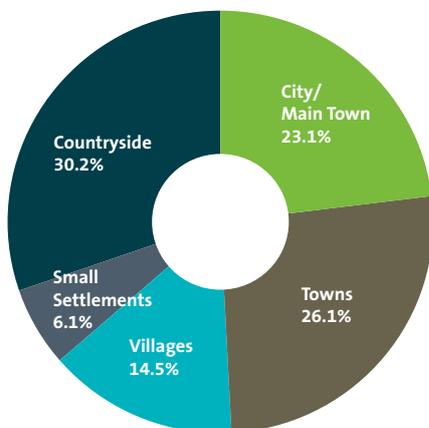
# Options for the Distribution of Housing Land

## Option 1

### Based on current population distribution

Each settlement is allocated a fair share of new housing allocation based on 2011 Census data<sup>4</sup>. Under this option each settlement would be allocated a share of new housing based on its existing share of households in 2011, with the countryside receiving the remainder.

Figure 5: Housing Distribution based on Location of 2011 Households



Location	Households (2011 Census)
Main City/Town	14,328
Town	16,176
Village	8,958
Small Settlement	3,802
Countryside	18,734

### Issues:

- Significant de-zoning and reduction in settlement limits
- Urban growth is constrained due to the degree of growth in the countryside
- Impact on sewerage system – proliferation of septic tanks
- Impact on landscape, character and tranquillity
- Impact on local road network
- Impact on Council services eg bin collection.

Under this option the distribution falls well short of the RDS requirement to concentrate development in the hubs and settlements over 5,000. The allocation to the countryside would be disproportionately high and would not be considered to represent a sustainable approach. There would be a very high risk that the Council's Plan Strategy would be found to be unsound at the independent examination as it would not comply with Regional Planning Policy and the Council could be instructed by DfI to withdraw its draft Plan Strategy document.

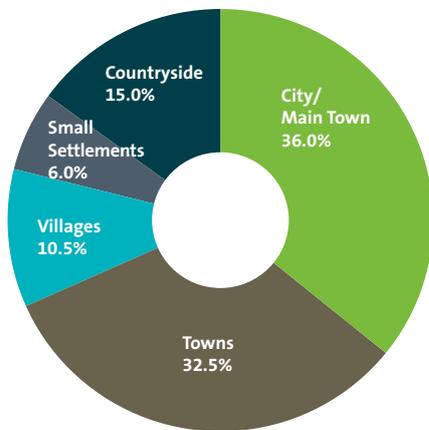
<sup>4</sup> Newry, Mourne and Down Households - <http://www.ninis2.nisra.gov.uk/public/PivotGrid.aspx?ds=4240&lh=73&yn=2011&sk=136&sn=Census%202011&yearfilter=>

## Option 2

### Based on RDS 60% target

This option would seek to directly meet the RDS target of 60% for all new housing to be located in brownfield sites of settlements greater than 5,000. In Newry, Mourne and Down this includes the city of Newry, main town of Downpatrick and the smaller towns of Kilkeel, Warrenpoint, Ballynahinch and Newcastle.

Figure 6: Housing Distribution based on ability to meet 60% Brownfield Target in Settlements over 5,000 Population



### Issues:

- Net migration from countryside to surrounding settlements
- Impact on rural communities, services and schools
- Fracturing of social fabric and ties of rural life.

Whilst this option meets the RDS requirements it does so at the expense of the countryside. It would only allow for 2,264 dwellings (126 per annum) in the countryside which based on existing rates of permission (under PPS21) would represent 10 years of permissions. An uptake of this option would require greater rural constraint than is currently imposed by PPS21 and the SPPS. This would require the Council to introduce tougher planning policy for single dwellings in the countryside which could threaten the vitality and viability of the district’s rural communities.

A disproportionate drive to one area at the possible expense of the other (rural (Option 1) or urban (Option 2)) may create issues in terms of the EQIA and Section 75 groups and possibly Strategic Environmental Assessment implications as excessive growth has the potential to create environmental issues. The simultaneous SA process is, however, designed to ensure that such implications are highlighted at an early stage and fully considered to ensure the LDP avoids taking a potentially unsustainable direction (see SA summary box below).

### Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

## Local Development Plan

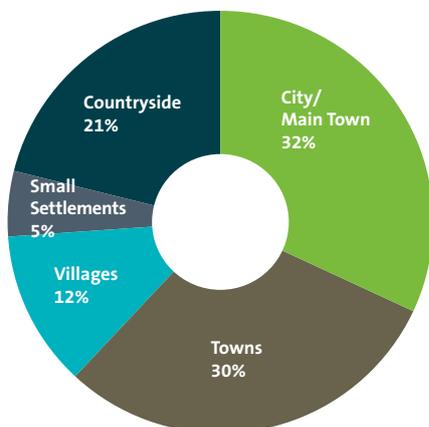
### Key Issue 3 - Distribution of Housing Land

#### Option 3

##### Balanced approach between options 1 and 2

This would still focus development within the settlements over 5,000 but at a lesser figure than the 60% while recognising that there is a need to sustain villages and countryside. The allocation to the countryside and villages is uplifted to maintain growth at current levels whilst a small reduction in the allocation to small settlements limits development opportunities to small scale development sites and infilling.

Figure 7: Housing Distribution Focused on Urban Growth with Sustainable Rural Development



This option would help the Council make progress towards achieving the RDS target of 60%, focusing large scale housing in the hubs and towns. It would sustain the villages with a degree of housing development being provided whilst providing for small scale development and infilling within small settlements.

Development in the countryside could be sustained in line with current approvals. The allocation to the countryside would be 3,169. Under this option there would be scope to retain the majority of existing rural planning policy in its present form. Minor changes and clarification to a number of policies may be required to remove ambiguity, providing greater certainty to the rural community, for example, size of gap that would be allowed for infill opportunity, the introduction of a visual assessment, and what qualifies for a replacement dwelling. For the most part development in the countryside could continue at the level experienced in recent years. Further consideration of the breakdown across all types of applications for dwellings in the countryside would be required to provide the justification for retention of current policies albeit with minor changes and clarification.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 3 is considered to be the most sustainable option. This option brings a balanced approach which sustains the rural community and maintains vitality and vibrancy in rural settlements, while directing the majority of new housing to hubs and towns.

Option 2 also has a broadly positive relationship with the sustainability objectives, however the effects are minor rather than significant and it does not deliver as much for the social sustainability objectives as Option 3.

Option 1 is the least sustainable option. It can be seen that it has a negative relationship with most of the social, economic and environmental sustainability objectives. Maintaining a high proportion of households in the countryside negatively affects the achievement of the environmental objectives, particularly physical resources. Significant long-term negative effects were also anticipated for the objectives of encouraging active and sustainable travel, water resources, landscape character and built and cultural heritage.

### Preferred Option:

## Option 3

### Justification

Option 3 is considered to represent a balanced and sustainable approach. It strikes a balance between the need to promote the development of our city and towns in line with the RDS whilst recognising the need to support our rural communities. Whilst not fully meeting the RDS target of 60% development in hubs and towns over 5,000 population it makes significant progress towards this target. It also affords the opportunity to retain the majority of rural planning policy in its current form and so continues to deliver sustainable development in the countryside.



- Q** Do you agree with the Council's preferred option for the allocation of housing across all settlement tiers and the open countryside? If not, why?
- Q** Are there other options the Council should consider?
- Q** Following adoption of the Local Policies Plan, as part of the LDP five year review, should sites that have not progressed to planning application stage be considered for replacement with alternative sites? If not, why?

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Strategic Employment Land Allocation

## Key Issue 4

### Quantity of Employment Land

#### Regional Policy Context

**5.30** The Regional Policy Context is provided by the Northern Ireland Executive's Economic Strategy and Sustainable Development Strategy; the DRD's Regional Development Strategy (RDS); the former DoE's Planning Policy Statements (PPSs); and the Strategic Planning Policy Statement for Northern Ireland (SPPS). The Northern Ireland Executive overarching goal is to improve the NI economy by creating a larger more export driven private sector.

**5.31** The RDS provides a framework for strong sustainable economic growth across the region and recognises that a growing regional economy needs a co-ordinated approach to the provision of services, jobs and infrastructure. It provides regional guidance to ensure an adequate supply of land to facilitate sustainable economic growth (Regional Guidance - RG1). Land should be accessible and located to make the best use of available services eg water and sewage infrastructure whilst avoiding, where possible, areas at risk of flooding from rivers, the sea, or surface water run-off.

**5.32** Planning Policy Statement 4: Planning and Economic Development (PPS4) sets out the regional planning policies for economic development uses and indicates how growth associated with such uses can be accommodated and promoted in development plans.

**5.33** The SPPS sets regional policy objectives for economic development in line with PPS4, these are:

- Promote sustainable economic development in an environmentally sustainable manner
- Tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality
- Sustain a vibrant rural community by supporting economic development of an appropriate nature and scale
- Support the re-use of previously developed economic development sites and buildings where they meet the needs of particular economic sectors

- Promote mixed-use development and improve integration between transport, economic development and other land uses, including housing
- Ensure a high standard of quality and design for new economic development.

**5.34** The SPPS states that a fundamental role for the LDP is to ensure that there is an ample supply of suitable land available to meet economic development needs within the plan area. LDPs should zone sufficient land for economic development over the plan period and should ensure a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity. Account should also be taken of factors such as accessibility by all members of the community, connectivity with the transportation system (particularly public transport), the availability of adequate infrastructure, the specialised needs of specific economic activities, potential environmental impacts and compatibility with nearby uses including the operational requirements of existing or approved economic development. A system to monitor the take-up and loss of land allocated for economic development purposes should also be put in place so that any shortfalls can be identified.

#### Local Context

**5.35** One of the key aims of the Council's Corporate Plan 2015-2019 is to attract investment and to support the creation of new jobs. The LDP has a critical role in ensuring suitable land use opportunities are provided which are aligned to the district's business needs.

**5.36** Estimates for the growth in employment in the Newry, Mourne and Down district over the period 2015-2030 range from 9,066 to 9,213 jobs based on 2012 NISRA population projections, depending on the model used to calculate growth. The LDP must therefore ensure there is an adequate supply of land to allow for this growth and ensure there are appropriate planning policies in place which facilitate economic development. The methodology for translating this industrial and business growth into a land requirement is set out in Preparatory Paper 3 - Employment and Economic Development

and is based on applying a density of 50 jobs per hectare. Using this density it has been identified that there is a need for between 166 and 169 hectares (ha) of employment land across the district up to 2030.

**5.37** Within the Newry, Mourne and Down District Council area 193 ha was zoned within the designated settlement limits for employment use by the current area plans. In addition, a further 34 ha were identified within the Invest NI Business Park on the Belfast Road outside Downpatrick and these are also suitable for employment use.

**5.38** A survey of employment lands across the district was undertaken in May and June 2015. The survey results found that 27 ha of land were in industrial use, with a further 154 ha of zoned industrial land remaining undeveloped across the district<sup>5</sup>. The majority of undeveloped land was located within the two main urban centres of Newry and Downpatrick.

<sup>5</sup> Economic development uses may also be acceptable on land zoned for mixed-use and existing non zoned economic development sites in settlements and the open countryside.

Table 5: Summary of Land Zoned for Employment in Newry, Mourne and Down

Settlement	Total Area Zoned (ha)	Area Developed (ha)	Average Area Developed Per Year (ha)	Area lost or discounted (ha)	Area Remaining* [vacant] (ha)
<b>Banbridge, Newry and Mourne Area Plan 2015: Based on land developed over the plan period 2000-2015</b>					
Newry City	124.05	17.93	1.20	7.39	96.70 [2.03]
Crossmaglen	1.65	0.00	0.00	1.15	0.50
Kilkeel	24.57	1.41	0.09	3.31	19.85
Newtownhamilton	0.46	0.00	0.00	0.00	0.46
Warrenpoint/Burren	16.94	0.44	0.03	1.23	15.27
Jonesborough	1.24	1.24	0.08	0.00	0.00
<b>Newry &amp; Mourne District Total</b>	<b>168.91</b>	<b>21.02</b>	<b>1.40</b>	<b>13.08</b>	<b>132.78[2.03]</b>
<b>Ards and Down Area Plan 2015: Based on land developed over the plan period 2000-2015</b>					
Downpatrick	19.7 (34.00**)	0.48 (5.88**)	0.03 (0.39**)	0.00 (7.53**)	16.83 (20.51**)
Ballynahinch	5.05	0.00	0.00	0.00	4.75
Newcastle	0.33	0.33	0.02	0.00	0.00
<b>Down District Total</b>	<b>25.08 (34.00**)</b>	<b>0.78 (5.88**)</b>	<b>0.05 (0.39**)</b>	<b>0.00</b>	<b>21.58 (20.51**)</b>
<b>Newry, Mourne and Down Total</b>	<b>193.99 (227.96***)</b>	<b>21.80 (27.68***)</b>	<b>1.45 (1.84***)</b>	<b>13.08 (20.61***)</b>	<b>154.36 (174.87***)</b>

Source: NMD planning survey of zoned employment land (May & June 2015)

\*Area remaining (hectares) excludes any area that cannot be developed due to constraints (eg flooding) or has been developed for non employment uses (eg housing).

\*\* Industrial land within the Invest NI Industrial Estate on the Belfast Road, Downpatrick but not zoned for industry.

\*\*\* Total is a combination of both zoned industrial land and the unzoned Invest NI site industrial estate on the Belfast Road.

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Local Development Plan

## Key Issue 4 - Quantity of Employment Land

**5.39** In Newry 96 ha of employment land were undeveloped with the majority concentrated to the north of the city at Carnbane Business Park. In Downpatrick 37.34 ha were undeveloped, distributed between the Down Business Park (20.51 ha) and lands at Killough Road, Cloonagh Road and Brannish Road (16.83 ha).

**5.40** On the basis of projected demand and current provision there would appear little justification for additional employment land to be identified. However a considerable proportion of the district's employment lands within the two hubs are within the ownership of Invest NI. Invest NI's serviced sites are only available to Invest NI client companies<sup>6</sup>. In Newry 52 ha out of 96 ha is held by Invest NI, while 29.69 ha out of 37.34 ha are held by Invest NI in Downpatrick. The SPPS not only requires LDPs to provide an ample supply of land but also

provide a range and choice in terms of size and location. For Newry and Downpatrick it could be argued that the proportion of lands held by Invest NI significantly restricts availability to a small pool of larger export orientated enterprises. The district has fewer businesses with sales of £250,000 or more (26%) than the NI average (29%)<sup>7</sup>. Thus 74% of the districts business base is not eligible for location at an Invest NI site. This figure may indeed be higher as it is likely that some of this 26% of businesses with higher sales could not meet the export and growth requirements laid down by Invest NI.

<sup>6</sup> Acceptance as a client company requires turnover of over £250k, export sales of over 25% and growth potential. See <https://www.investni.com/about-us/how-we-support-business.html>

<sup>7</sup> NMD Economic Regeneration and Investment Strategy Appendix 1: Socio Economic Profile of Newry, Mourne and Down.



# Options for the Quantity of Employment Land

## Option 1

**No overall increase in the amount of land zoned for employment**

Whilst this option would meet overall projected need on the basis of the overall quantum of employment land it does not take into account the significant proportion of zoned employment land held by Invest NI.

## Option 2

**Uplift the overall amount of land zoned for employment use by 20%<sup>8</sup>**

This option seeks to ensure there is a balanced reserve of employment land, reflecting the existing business base across the district by increasing the availability of non Invest NI lands. This would result in a greater choice of sites for those businesses that have a smaller turnover and/or whose focus is more on the domestic market.

<sup>8</sup> Total Employment Land available 174 ha, Invest NI holding 81.69 ha this represents 46.9% of total available employment land. This is approx. 20% higher than business base figures would suggest is necessary, namely 26% of NMD business could meet Invest NI criteria.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 2 is the most sustainable option. It has a minor positive effect on the objective of strengthening society, but otherwise has no relationship with the social sustainability objectives. This option would create more opportunities for small/family businesses and businesses in rural areas, which was considered to have a significantly positive effect on the objective of sustainable economic growth and minor benefit in terms of the provision of skills training for the education objective.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it will ensure that there is an adequate level of employment land for businesses of all sizes across the district. The proposed percentage uplift seeks to realign the level of the Invest NI land with the proportion of the district's business base with sales of £250,000 or more. Subject to further assessment of business needs it is proposed to make provision for additional employment lands to address reduced choice as a consequence of Invest NI land holdings.



*Q* Do you agree with the Council's preferred option? If not, why?

*Q* Do you believe there is an adequate quantity of employment land zoned in the district? If not, why?

**Spatial Growth Strategy:**  
Promoting Urban Centres and Supporting Sustainable Rural Development

## Key Issue 5

# Distribution of Employment Land

**5.41** In addition to assessing the level of employment land, there is a need to assess the 'fitness-for-purpose' including environmental implications of existing employment land provision. This will principally help to identify the 'best' employment sites to be retained and protected, replaced or released for other uses. This will be undertaken later in the Plan process. At this stage it must be determined how this amount of employment land should be allocated across the settlements.

### Regional Policy Context

**5.42** Both the RDS and SPPS require the focus of any allocation of economic development land to be within the main hubs. This does not exclude land zonings in the local towns and villages although normally land is not zoned in villages as prevailing policy currently facilitates development within and outside settlement limits. The SPPS states that within villages and small settlements the LDP will not normally zone land for economic development purposes as this could inhibit flexibility.

### Local Context

**5.43** The Newry, Mourne and Down Community Plan's thematic group for economic development, regeneration and tourism seeks to support existing businesses to grow and develop in indigenous and export markets, including a focus on five key skill areas of aerospace, life and health sciences, agri-food, digital and advanced manufacturing and advanced materials. It also seeks to support business start-ups and growth of social enterprises in the district. The Community Plan seeks to ensure the LDP promotes economic development and regeneration across the district.

**5.44** Whilst the aforementioned estimates of growth help in the identification of future employment land requirements, the Council is supporting a number of key economic projects<sup>9</sup> that have the potential to result in increased demand, over and above past trends, for employment lands at certain locations. Two of these projects, the Newry Southern Relief Road and Kilkeel Harbour development project, could have a significant impact on the demand for economic development land within Warrenpoint and Kilkeel. After the two main hubs in the district (Newry and Downpatrick) Kilkeel and Warrenpoint currently have the next largest allocation of employment land, 24.57 ha and 16.94 ha respectively (see Table 5). Therefore there is a need to consider whether existing zoned land will be adequate to meet potential increased demand as a consequence of improved infrastructure over the Plan period.

<sup>9</sup> As part of the Belfast City Region Growth Deal Newry, Mourne and Down Council have identified the Newry Southern Relief Road and Kilkeel Harbour Development as key strategic projects to support economic growth of the district.

## Spatial Growth Strategy:

Promoting Urban Centres and Supporting Sustainable Rural Development

# Local Development Plan

## Key Issue 5 - Distribution of Employment Land

### Kilkeel Harbour Development Project

**5.45** Kilkeel is the largest fishing port in NI, and accounts for a third of the value of all fish landed in NI. A £36million project is proposed for the harbour area incorporating a new breakwater and associated expansion plans for the fish processing and engineering support sectors. The fishing fleet supports 1,300 jobs and a further 620 jobs in the fish processing sector.

**5.46** The Kilkeel Harbour development project consists of a number of elements:

- Development of the external harbour to accommodate larger ships
- Development of additional slipways and dry dock facilities for marine engineering
- Development of a leisure/tourism marina.

An economic appraisal, feasibility study and business case have been completed with engineering and environmental studies scheduled for completion by December 2019.

**5.47** In considering the impact of the Kilkeel harbour development project the LDP will also be mindful of the district's secondary fishing port of Ardglass and its redevelopment plans. As highlighted in Chapter 2 both Kilkeel and Ardglass are key harbours and the LDP will seek to support the economic growth of both ports.

### Newry Southern Relief Road and Warrenpoint Harbour

**5.48** The Southern Relief Road is a new strategic road link to the south of Newry linking the A1/N1 Belfast - Dublin corridor with the A2 Warrenpoint Road. This would provide an alternative route for strategic traffic that avoids Newry City centre and a significantly improved travel time between the strategic road network and Warrenpoint Port. It is part of the DfI's Strategic Road Improvement Programme and is currently progressing towards the identification of a preferred route option by Summer 2018.

**5.49** The NISRA review of NI ports traffic in 2016 indicated that the majority of total NI traffic came through Belfast (66%). However, Warrenpoint had the second highest level of total NI traffic (12%). Warrenpoint harbour is primarily a commercial port for freight services, with a focus on roll-on roll-off freight. The harbour is a regional gateway to Britain and Europe providing roll-on roll-off service to Heysham, Waterford and Zeebrugge as well as container services to Cardiff and Bristol. The port is thus an important commercial freight gateway and key employment generator and improved road connectivity is likely to bring increased import and export business.

# Options for the Distribution of Employment Land

## Option 1

**Retain existing zonings as contained within the BNMAP and ADAP.**

This option is effectively a 'do nothing' option that leaves an imbalance between the two former district's with land designated at a village level (Industrial Policy Areas) on the former Down district side but not on the former Newry and Mourne district side. In addition no consideration is given to those lands that have been zoned where there appears to be no prospect of them being brought forward for development.

## Option 2

**Retain broad balance of remaining employment land provision across the district (currently 132 ha (former Newry and Mourne district) and 42 ha (former Down district)).**

Evaluate all current zonings and designations, as contained in BNMAP and ADAP, and rezone unsuitable or unnecessary land. It would also consider opportunities for local sites at village level across the district similar to the Industrial Policy Areas in the ADAP, within smaller population centres but still located on the main road network.

This option is considered to be a more balanced approach ensuring not only a spread of employment land across the district but across different settlement tiers. It would also ensure that land zoned or designated for employment was the most suitable land free from environmental constraints.

## Option 3

**Focus employment lands in hubs only (Newry and Downpatrick) with proportionate allocation based on percentage resident population.**

Based on the 2011 Census 26,893 people lived in Newry and 10,874 people lived in Downpatrick. Should employment lands be allocated proportionately based on the main hubs only then 71.2% of the 169 ha (120 ha) would be allocated to Newry and 28.8% (49 ha) would be allocated to Downpatrick.

Whilst this allocation reflects the respective size and function of the district's two main settlements and would be in line with the requirements of the RDS, it fails to address the need for employment lands outside Newry and Downpatrick.

As well as identifying and protecting zoned land and previously developed land for economic development the Plan may bring forward policies regarding the type and range of economic development uses that will be acceptable on zoned sites and identify opportunities for mixed-use development.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 2 is the most sustainable option. By spreading employment opportunities across more settlements in the district, this option has a minor positive effect on most of the social sustainability objectives. It also acts positively on the economic objectives, but negatively for the environmental sustainability objectives.

Option 1 has fewer negative impacts than Option 3. It does not significantly influence the social sustainability objectives and brings minor benefits to the education and economic growth objectives. Similar to Option 1 its relationship with the environmental objectives is largely a minor negative one, reflecting the nature of the development type.

Option 3 would confine economic development land to the two hubs. While this would benefit the population living in these areas, it would reduce opportunities to access employment for people living elsewhere in the district. This would have a minor negative effect on the social sustainability objectives. Option 3 would also create increased pressure and demand for land around the two hubs.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it will maximise opportunities for employment generation across the whole district, seek to deliver proportionate growth and ensure that employment land is brought forward in a timely manner.



- Q Do you agree with the Council's preferred option? If not, why?
- Q Do you think the existing employment land is located in suitable locations to meet the district's future needs? If not, why?
- Q Are there any other options the Council should consider?
- Q Is there a need to provide additional sites for small business units in towns and villages?



Warrenpoint Harbour



Kilkeel Harbour



Quoile River, Downpatrick



Down Countryside

## 6. Social: Accommodating People, Improving Health and Wellbeing

**6.1** The second LDP theme, as set out in Chapter 4, focuses on social issues. A number of the associated objectives under this theme underpin our spatial growth strategy and are therefore addressed in Chapter 5. Those remaining social objectives relevant to this section are as follows:

- To support the regeneration of disadvantaged and deprived areas
- To provide for vital and vibrant rural communities, whilst protecting the countryside in which they live by accommodating sustainable growth
- To recognise the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities
- To protect and enhance the provision of open space across the district to support health and wellbeing
- To provide for quality public spaces and 'shared spaces' that are accessible to all.

### Regional Policy Context

**6.2** Achieving balanced communities and strengthening community cohesion is one of the major themes underpinning both the RDS and SPPS. The RDS states that provision of more social and affordable housing helps to build strong balanced communities while the SPPS highlights that provision of good quality housing that offers a variety of house types, sizes, and tenures to meet different needs is fundamental to the building of more balanced communities.

**6.3** The NIHE also believe that all new housing developments should support the creation of sustainable and balanced communities and suggest that LDPs should have the following strategic objective: "All development should seek to promote good relations and reduce social inequalities by being inclusive and by considering the impact of development on the social fabric of communities." In pursuing this objective the NIHE suggest that the planning system should take into account the needs of the community, including requirements relating to age, income, ethnic background or disability<sup>1</sup>.

**6.4** The SPPS highlights that housing is recognised as a key driver of physical, economic and social change in both urban and rural areas. In furthering sustainable development it states that it is important to manage housing growth in a sustainable way.

**6.5** A key aim of the RDS is to promote development which improves health and wellbeing as a healthy community is better able to take advantage of the economic, social and environmental opportunities which are open to it. Improving health and wellbeing is likewise acknowledged within the SPPS through its identification as a core planning principle. The SPPS suggests that improving health and wellbeing is achieved through a number of actions which include the protection and provision of new, quality open space within or close to settlements. These areas of open space play a key role in promoting healthy living and tackling inequality through facilitating play, sporting activities, passive activity and interaction with others.

### Evidence base

**6.6** The 2011 Census shows that the total social rented stock in the district (6,185 units) has fallen by 25% compared to the 2001 figure. The NIHE's draft Housing Strategy (August 2017) indicates that it sold approximately 12,192 properties in the district since the introduction of the house sales policy, leaving approximately 5,338 units remaining. The NIHE evidence shows that the on-going decline in social housing stock is set against a 31% increase in need for new social housing in the district since 2012.

**6.7** The NIHE also highlights that the sale of social housing and subsequent mixing of tenures has not significantly improved multiple deprivation scores for these locations. Additional measures that achieve better integration of income groups would therefore appear necessary if balanced and sustainable communities are to be achieved.

<sup>1</sup> NIHE draft Housing Strategy for Local Development Plans August 2017

**Social:**

Accommodating People, Improving Health and Wellbeing

**Local Development Plan****Social: Accommodating People, Improving Health and Wellbeing****Key Statistics**

- Social housing need figures for 2017 show highest demand in Newry (698), followed by Newcastle (218), Warrenpoint (196) and Downpatrick (148)<sup>2</sup>
- The district contains 8 out of the 100 most deprived Super Output Areas (SOAs) across NI, accounting for 10% of its 84 SOAs. This ranks the Council third on the Multiple Deprivation Measure after Belfast City and Derry City/Strabane District Councils<sup>3</sup>
- In 2011 43-46% of households in Newry, Mourne and Down were in fuel poverty<sup>4</sup>
- Population projections for the district show the population aged 65 years and over will grow by 33.2% over a 10 year period to 2024<sup>5</sup>
- In 2011 11.54% of the district's population had a long-term health problem or disability that limited their day-to-day activities<sup>6</sup>.

**6.8** Further statistics and data relating to the associated topics have been gathered and analysed from a number of sources including government agencies and internal departments within the Council. For further details relating to the evidence base please refer to the following LDP Preparatory Papers; Paper 2: Housing and Paper 10: Open Space, Recreation and Leisure.

**Identification of Key Issues**

**6.9** Five key issues and a range of associated options are identified where the LDP could help to improve access to housing, create balanced communities and support physical activity. These have been identified through our evidence base, engagement with key consultees as well as internal engagement with members and other Council departments. The issues relate to meeting social housing need, housing in the countryside, ensuring that new housing stock will in future meet the needs of all generations, improving energy efficiency and reducing fuel poverty through the integration of renewable energy and improving passive solar design and ensuring there is sufficient access to open space.

<sup>2</sup> NIHE Housing Investment Plan Annual Update 2017

<sup>3</sup> NISRA Northern Ireland Multiple Deprivation Measure 2017

<sup>4</sup> NINIS Census 2011 - Fuel Poverty

<sup>5</sup> NINIS Population Projections 2014-2039

<sup>6</sup> NINIS Census 2011 - General Health by Long Term Health Problem or Disability

## Key Issue 6

# Social Housing Need

**6.10** As highlighted under Key Issue 2: Quantity of Housing Land, the Council will seek to ensure the LDP brings forward an adequate level of housing land to meet all housing needs over the Plan period. The provision of social housing is a major issue for the district and the LDP will need to consider how best to meet this particular need.

### Regional Policy Context

**6.11** The RDS under its Regional Guidance RG6 seeks to encourage mixed housing development, recognising that diverse populations lead to more stable communities and can help to reduce social isolation. Under Regional Guidance RG8 the RDS highlights that the varied needs of the whole community need to be met and this includes the availability of affordable and special needs housing. It states that planning authorities should take account of housing need identified through the NIHE Housing Needs Assessment/Housing Market Analysis.

**6.12** The SPPS requires LDPs to identify sites or areas within settlements where the site (or part thereof) is required to meet one or more category of need (affordable housing, traveller accommodation and supported housing) and clearly state the proportion required.

**6.13** Planning Policy Statement 12: Housing in Settlements (PPS12) states that land for social housing should be achieved through either the zoning of land or the outlining of key site requirements through the development plan process. The zoning of land for social housing will help to facilitate the supply of affordable housing. Affordable housing is defined by the NIHE as social rented housing and intermediate housing for eligible households.

### Local Context

**6.14** The NIHE annual Housing Needs Assessment (HNA) is an assessment of local housing need primarily in relation to general needs housing, social housing, supported housing, affordable housing and travellers accommodation. The HNA and annual Housing Investment Plan for the Newry, Mourne and Down district provide the LDP with the evidence base that will be taken into account in the allocation of land required to meet a range of housing needs.

### Social Housing Need

**6.15** The NIHE Housing Investment Plan for the district states that the requirement for new social housing in the district has remained at a very high level since 2010. The five year assessment for 2016-2021 shows a need for 1,906 units with the greatest need in Newry City (698 units), Newcastle (218 units) and Downpatrick (148 units).

**6.16** In the year ending 31 March 2017 a total of 42 social housing units were completed with schemes delivering 182 units under construction. The three year Social Housing Development Programme has 538 units programmed for delivery in the period 2017-2020.

**6.17** In recent years social housing need in the district has been delivered by Housing Associations on NIHE land. However, the NIHE has advised that areas of social housing need are emerging in areas where it does not own land. Presently housing need is addressed through the BNMAP by way of key site requirements on certain sites requiring the delivery of a minimum number of social housing units in addition to zoning a small number of sites solely for social housing. However, there is no corresponding provision within the ADAP.

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### Key Issue 6 - Social Housing Need

**Supported Housing Needs Assessment**

**6.18** 'Supported Housing' is a term used to describe a range of both long-term and short-term accommodation provided for people who need an additional level of housing related support to help them lead an independent life. The NIHE advise in its Social Housing Development Programme that there is currently no need for supported housing units in the district for the period 2017-2020.

**Travellers Accommodation Needs Assessment**

**6.19** There are three broad categories of Travellers accommodation: grouped housing, serviced sites and transit sites. The NIHE interim HNA (April 2017) states that the three year Traveller Accommodation Programme (2015-2018) currently identifies a need for a serviced site in Newry.

**Community Plan - Living Well Together**

**6.20** The district's housing need is highlighted in the Community Plan with access to quality housing being a priority area. The Community Plan's Thematic Delivery Plan states that the LDP should take account of NIHE identified social housing and affordable housing needs.

**Banbridge/Newry and Mourne Area Plan 2015**

**6.21** A review of current housing zonings and associated social housing requirements within the BNMAP shows that while there is still significant social housing potential on zoned housing land this has been slow to come forward. In recent years there is increasing pressure from developers to seek removal of social housing requirements from these sites. Therefore the Council now needs to consider how might the LDP ensure that progress on meeting social housing need be achieved where zoned lands are slow to be developed. A review of existing uncommitted zonings in the adopted plans is being undertaken as part of the LDP preparation to determine if their delivery is realistic and if it would be appropriate to carry them forward as zonings in the new LDP.

**Ards and Down Area Plan 2015**

**6.22** The ADAP states that the proportion of land or units to be set aside for social housing will be determined as part of the development control process. Bringing forward zones sites for social housing and introducing key site requirements for social housing provision for the legacy Down District Council area would create a more balanced approach to addressing social housing need across the district but would, as previously highlighted, need to form part of a broader approach which considered the extent to which zoned sites could be delivered.



Social Housing Millvale Road, Bessbrook

# Options for Social Housing Need

## Option 1

**Set out a Strategic Policy requiring all housing sites, over a certain threshold, to provide a proportion of social housing.**

The NIHE has suggested that a 20% proportion could be required for developments of 50 units or more (or 1 hectare or more) in urban settlements. In areas of high social housing need the threshold could be reduced to 25 units in urban areas and 10 units or more (or 0.5 hectare or more) in rural areas. Social housing units should be pepper-potted throughout a development to encourage 'tenure blind' homes.

## Option 2

**Zone sites solely for social housing.**

The NIHE however has concerns that developing large scale social housing developments (generally over 50 units) will prohibit the creation of balanced and sustainable communities.

## Option 3

**Zone sites for social housing (not large scale) and in addition facilitate social housing as a proportion of larger housing schemes through key site requirements as currently operating under BNMAP.**

This option addresses the negative aspects of Option 2 by avoiding large scale social housing developments and seeks to integrate social housing units within larger private housing schemes.

## Option 4

**Combination of Options 1 and 3.**

This would help to ensure that social housing schemes were brought forward to meet identified need. In the absence of zoned sites, including those with social housing key site requirements coming forward, provision could still be met through operational policy on other housing sites.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that all of the options scored positively for sustainable housing with Option 4 scoring significantly positive. Options 2 and 3 scored negative on the basis that zoning areas for social housing could lead to social exclusion and areas of deprivation. Options 2, 3 and 4 also scored positively for sustainable travel. Options 1 and 4 scored positively for strengthening society.

### Preferred Option:

## Option 4

### Justification

Option 4 is considered to be the preferred option as this affords the Council the maximum flexibility to address social housing need across the district.



- Q** Do you agree with the Council's preferred option? If not, why?
- Q** The NIHE proposed thresholds of 50 units (or 1 hectare or more) or 25 in urban areas experiencing high need and 10 units or more (or 0.5 hectare or more) in rural areas. Do you agree with the proposed thresholds? Is there a need to reduce the thresholds to ensure this policy is successful in the district?
- Q** Are there any alternative approaches that would support the delivery of social housing across the district?

# Key Issue 7

## Housing in the Countryside

### Regional Policy Context

**6.23** The SPPS requires councils in preparing their LDPs to bring forward a strategy for sustainable development in the countryside, together with appropriate policies and proposals that must reflect the aims, objectives and policy approach of the SPPS.

**6.24** The aim of the SPPS with regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development while supporting and sustaining rural communities consistent with the RDS.

**6.25** The SPPS provides for the following categories of residential development within the countryside:

- New dwellings in existing clusters
- Replacement dwellings
- Dwellings on farms
- Dwellings for non-agricultural business enterprises
- Infill/ribbon development
- The conversion and re-use of buildings for residential use
- A dwelling where there are personal and domestic circumstances
- A temporary caravan
- Social and affordable housing development.

**6.26** Subject Policies for 'Development in the Countryside' as currently contained within the SPPS, and outlined above, are very prescriptive and carry across much of the detail policy contained within Planning Policy Statement 21: Sustainable Development in the Countryside (PPS21). The Council considers that there is currently limited scope to vary existing PPS21 policies pertaining to housing in the countryside. However, DfI has undertaken a review<sup>7</sup> of this section of the SPPS and the outcome of this review is currently pending. The Council will continue to monitor this work and will revisit its proposed housing in the countryside policies as and when DfI publish any revised regional policy.

**6.27** Whatever the outcome of this review it is highly unlikely that the SPPS will allow councils the opportunity to return to a policy approach pre-PPS21 based on location, siting and design considerations alone. This would be contrary to the broad approach of the SPPS in terms of clustering and consolidating development and would not be considered to be a sustainable approach.

### Local Context

**6.28** Within the district approximately 30.2%<sup>8</sup> of households live in the open countryside.

<sup>7</sup> A DfI 'Calls for Evidence' consultation on strategic planning policy in the SPPS for 'Development in the Countryside' ran from 7th March 2016 to 6th May 2016 to help inform the scope of their review. The review is expected to be completed in 2018.

<sup>8</sup> Newry, Mourne and Down Households - <http://www.ninis2.nisra.gov.uk/public/PivotGrid.aspx?ds=4240&lh=73&yn=2011&sk=136&sn=Census%202011&yearfilter=>

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### Key Issue 7 - Housing in the Countryside

Table 6: Planning Decisions for Single Dwellings in the Countryside in Newry, Mourne and Down District 2002-2016

Year	Approvals (%)	Refusal (%)	Withdrawals (%)	Total
2002-2003	1444 (75.4)	171 (8.9)	300 (15.6)	1915
2003-2004	1606 (74.6)	281 (13.0)	263 (12.2)	2150
2004-2005	1464 (63.8)	511 (22.2)	319 (13.9)	2294
2005-2006	1346 (47.6)	1144 (40.5)	334 (11.8)	2824
2006-2007	1021 (56.9)	682 (38.0)	91 (5.0)	1794
2007-2008	1321 (79.4)	258 (15.5)	83 (4.9)	1662
2008-2009	1164 (95.0)	22 (1.7)	39 (3.1)	1225
2009-2010	1069 (86.1)	95 (7.6)	77(6.2)	1241
2010-2011	701 (68.5)	223 (21.7)	99 (9.6)	1023
2011-2012	711 (76.3)	172 (18.4)	48 (5.1)	931
2012-2013	599 (78.1)	136 (17.7)	31(4.0)	766
2013-2014	445 (83.6)	56 (10.5)	31 (5.8)	532
2014-2015	423 (81.3)	69 (13.2)	28 (5.3)	520
2015-2016	309 (80.2)	61 (15.8)	15 (3.8)	385
2016-2017	559 (76.9)	113 (15.5)	55 (7.6)	727
<b>Total</b>	<b>14,182 (70.9)</b>	<b>3,994 (20.0)</b>	<b>1,813 (9.1)</b>	<b>19,989</b>

Source: DfI Planning Statistics

**6.29** Under PPS21 it is clearly evident that the number of rural housing approvals is notably reduced when compared to approvals under historical rural planning policies. Within the first three years of assessing applications under PPS21 (2010-2013) when compared to the following three year period (2013-2016) the average number of applications determined or withdrawn dropped significantly from 906 to 544.

**6.30** A review of planning approvals across the district issued from June 2010 shows that the most popular housing application type in the countryside, from the implementation of PPS21, has been for replacement dwellings which equates to approximately 36% of all approvals followed by farm dwellings at 33%. These two application types appear to be the most predominant classifications. However, it must be taken into consideration that the way in which the applications are described can impact on the accuracy of these findings as a large percentage of applications are simply described as 'dwelling in the countryside' and can therefore distort the statistics.

**6.31** In addition to reflecting the SPPS any proposed changes to the current suite of policies within PPS21 must be guided by our spatial growth strategy and strategic housing allocation across our settlement tiers and open countryside. In order for the Council to demonstrate that our LDP is taking forward a sound and sustainable approach to housing in the countryside any proposed changes to the policy provision of PPS21 must align with the housing allocation for the countryside.

**6.32** The Council's preferred approach in respect of its housing allocation is set out in Chapter 5. This preferred approach, described as a balanced approach, is regarded as the way forward as this would allow the Council to retain the majority of existing rural planning policy in its present form. As indicated above there is a limited degree of scope under the SPPS to alter those policies as currently set out within PPS21. As part of the preparation of this preferred options paper a review of PPS21 has taken place. Following on from this it is proposed that the policies contained within PPS21 are largely carried forward. It is proposed to provide some clarification and minor changes to these policies to address a number of shortfalls in current policy. This would include aligning the policy with the provisions of the SPPS such as the omission of Dispersed Rural Communities (CTY1 and CTY2). It could also include providing definition of terms and what would be considered to constitute a 'focal point' (CTY2a) and a 'small group' and 'small settlement' (CTY5) to prevent ambiguity.

**6.33** A sustainable rural settlement pattern should protect the functions of the countryside in terms of maintaining the quality and character of the rural landscape without creating infrastructure demands which are disproportionate to the population within the rural area. It is considered that the Council's preferred approach in terms of housing allocation to the countryside will allow for an appropriate level of building in the countryside that balances the need to sustain rural communities whilst not overloading rural infrastructure and eroding the rural landscape.



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# Options for Housing in the Countryside

## Option 1

**Adopt existing policy approach.**

This option would adopt the current policy based approach as set out in PPS21 and the SPPS for single dwellings in the countryside. It provides the same level of development opportunity as currently provided and is in keeping with the SPPS. It does not however consider what scope there is to revise rural planning policies, to more closely align with the needs of the district nor the opportunity to provide greater clarity or address shortfalls.

## Option 2

**Adopt the existing policy approach but in addition provide clarification and minor changes to current policies to address a number of shortfalls.**

This option would seek, where feasible, to tailor existing policy to the needs of the district. Initially this would involve clarification and minor changes to the carried forward policies. Following the outcome of the SPPS review into 'Development in the Countryside' the Council would further consider the scope within the revised SPPS to vary its housing in the countryside policies within the context of the Council's spatial growth strategy and strategic housing allocation.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that both options scored the same across all the objectives. They scored positive for strengthening society and sustainable housing. Both options were considered to have a negative effect across almost all of the remaining sustainability objectives, reflecting the possible impacts from housing in the countryside.

### Preferred Option:

## Option 2

### Justification

Option 2 would enable the Council to provide greater clarity to its rural planning policy and allow for some minor changes to align with the district's rural housing needs. Overall there would be no significant change to the level of residential development in the countryside and this option would support the Council's Growth Strategy for the district.



**Q** Taking account of our proposed spatial growth strategy and strategic housing allocation, do you agree with the Council's preferred approach to carry across the majority of policies within PPS21, with clarification and minor changes, in so far as they relate to housing in the countryside?

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## Key Issue 8

# Future Proofing and Housing for All

**6.34** Lifetime homes seek to provide homes that are accessible and adaptable. They are designed to create better living environments for everyone, from raising children, coping with illness or dealing with reduced mobility later in life. They allow people to remain independent for longer in their own homes. The NIHE has indicated that the development of homes to this standard is especially important in the context of an ageing population and can prevent costly and disruptive adaptations.

**6.35** According to the NIHE the demand for people with a disability who wish to own their own home cannot readily be met, as there is no requirement for market housing to provide wheelchair accessible homes. Wheelchair accessible housing will allow older and disabled people to feel safe and secure and to be fully integrated within the residential community.

### Regional Policy Context

**6.36** The RDS under its Regional Guidance RG8 states that the varied housing needs of the whole community need to be met. It states that emphasis is on managing housing growth to ensure that there continues to be a focus on developing more high quality accessible housing within existing urban areas without causing unacceptable damage to the local character and environmental quality or residential amenity of these areas.

**6.37** The SPPS states that it is widely recognised that well designed buildings and successful places can have a positive impact on how people feel. The way in which places and buildings are configured, patterns of movement in the space around us and the level of access to quality open space are all factors that can make us feel good.

**6.38** The SPPS states that planning authorities should utilise development planning, regeneration and development management powers to contribute to the creation of an environment that: is accessible to all and enhances opportunities for shared communities.

**6.39** It states that the planning process has an important role to play in the delivery of good quality housing that supports the creation of more balanced communities. Balanced communities can contribute positively to the creation and enhancement of shared spaces and vice-versa. Offering a variety of house types, sizes and tenures in housing schemes will therefore help with meeting the diverse needs of all the community and enhance opportunities for shared neighbourhoods. The aim should be to create well-linked, mixed-tenure neighbourhoods, with opportunities for communities to share access to local employment, shopping, leisure and social facilities.

**6.40** It recognises that good design can change lives, communities and neighbourhoods for the better. It can create more successful places to live, bring communities together, and attract business investment. It can further sustainable development and encourage healthier living; promote accessibility and inclusivity; and contribute to how safe places are and feel.

## Local Context

**6.41** The NIHE, in its draft Housing Strategy for Local Development Plans, identifies the key components of a sustainable community. They state that sustainable communities are: inclusive and safe, well connected, well serviced, environmentally sensitive, economically successful, well designed and built, fair for everyone and well run which collectively contribute to place-making.

**6.42** The Community Plan states that the local housing market is slowly recovering following the economic crash in 2007. Whilst the need for family accommodation remains strong across all tenures, there is also a requirement to consider dwellings to facilitate the elderly and smaller households.

**6.43** At present the two development plans covering the district (BNMAP and ADAP) identify land to meet housing need but do not specifically address the requirements associated with future proofing and providing housing for all.

**6.44** In 2011 19.85% of people in the district had a long-term health problem or disability that limited their day-to-day activities<sup>9</sup>. Whilst this is a significant proportion of our total population it should be noted that the 65 and over proportion of our population suffers from the highest incidence with 70.5% of this group reporting they have a long-term health condition<sup>10</sup>. In addition, 11.79% of people stated that they provided unpaid care to family, friends, neighbours or others.

**6.45** According to the 2011 Census there were 21,964 people aged 65 years and over living in households in the district. Of these 7.8% lived in households that had been adapted or designed for wheelchair use (compared to the NI average of 7.1%) and 10.6% lived in households that had been adapted or designed for other physical or mobility issues (compared to the NI average of 12.4%).

**6.46** NISRA population projections (published 25 May 2016) show that the district's population aged 65 years and over will grow by 33.2% over a 10 year period to 2024; this is the third highest growth for this group across all 11 council areas. The housing needs of this group should therefore be considered as part of the preparation of the new LDP with the opportunity to introduce policies which aid the delivery of suitably designed and constructed accommodation. This would support and enhance current Building Control requirements in making new dwellings accessible for all.

<sup>9</sup> NI Census 2011

<sup>10</sup> NI Census 2011

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# Options for Future Proofing and Housing for All

## Option 1

**To retain the current design approach as set out in Planning Policy Statement 7 (PPS7) Policy QD1 (general criteria for meeting housing design) with no adjustments or amendments.**

This is in effect a 'do nothing' approach as the current policy does not require lifetime homes or wheelchair accessibility standards to be met by private developments.

This option would fail to ensure the provision of lifetime homes and wheelchair accessible homes within the district.

## Option 2

**Promote/encourage the provision of lifetime homes and require wheelchair accessible housing, across all tenures, to ensure an appropriate supply of homes for children, older people and those with physical disability.**

This could be achieved by the formulation of a checklist which sets out the requirements necessary for new homes in the district to meet the lifetime homes standard. It could also be stipulated that a minimum of 5% of private units within major developments (50 units or more) should be designed to be wheelchair accessible.

This option whilst raising awareness of the issue amongst developers is likely to fall short of ensuring the delivery of a sustainable housing stock for all in the community. It could be regarded as a 'first step' towards developing a future policy approach in the delivery of this type of housing.

## Option 3

**Introduce new strategic policy covering lifetime homes and wheelchair accessible housing to require the provision of an appropriate supply of homes for children, older people and those with physical disability.**

This option would require at least 20% of homes across all tenures, on sites of 50 or more dwellings to be built to lifetime homes standard. This option would also include the introduction of wheelchair accessible homes as per Option 2.

Option 3 would ensure the provision of lifetime homes and wheelchair accessible homes within the district which would secure a sustainable housing stock for all in the community.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 3 scored most positively across health and wellbeing, strengthening society and sustainable housing based on its potential to provide suitable accommodation for those with a health problem or disability. Option 2 scored uncertain for these objectives as the option did not guarantee this provision. Option 1 was the least positive option scoring negative for both health and wellbeing and strengthening society.

### Preferred Option:

## Option 3

### Justification

Option 3 would safeguard the provision of lifetime homes and wheelchair accessible homes within the district. This would ensure that the needs of the community are addressed by providing homes that are flexible and provide a better living environment for everyone.



- Q** Do you agree with the Council's preferred option? If not, why?
- Q** Do you think there should be a variation (i.e. reduction) in the suggested threshold of 50 units or more, as suggested by the NIHE, to ensure provision of these housing types to meet the future needs of all our population?
- Q** Do you think the proposed percentage allocations for wheelchair accessible homes (5%) and lifetime home (20%), as suggested by NIHE, should be adjusted? If so what level do you consider appropriate?

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## Key Issue 9

# Integrated Renewable Energy and Passive Solar Design

**6.47** NI has significant renewable energy resources and a vibrant renewable energy industry. Renewable energy reduces our dependence on imported fossil fuels and helps NI achieve its targets for reducing carbon emissions. It also supports the wider economy by providing employment and opportunities for investment as well as benefitting our health and wellbeing and our quality of life<sup>11</sup>.

### Regional Policy Context

**6.48** The RDS Regional Guidance RG9 seeks to reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality. It highlights the need to consider how to reduce energy consumption and move to more sustainable methods of energy production. Mitigation measures outlined under RG9 include improving energy efficiency and adaptability of buildings, increasing the use of renewable energies and utilising electricity from low or zero carbon energy sources. Micro-generation and passive solar design can both help to alleviate fuel poverty.

**6.49** The SPPS states that councils should set out policies and proposals in their LDPs that support a diverse range of renewable energy development, including the integration of micro-generation and passive solar design. In assessing applications it notes careful consideration must be given to these forms of development, taking into account the wider environmental benefits in addition to normal planning criteria.

**6.50** Planning Policy Statement 18: Renewable Energy (PPS18) seeks to facilitate and encourage greater integration of renewable energy technologies both in the design of new buildings and retrofitting of technology to existing buildings. It highlights that for many buildings this will mean increased consideration of the benefits of micro-generation and complementary measures in the design of new buildings,

such as passive solar design principles to help achieve energy gains. It notes that the greatest opportunity for maximising benefits is for the technology to be applied to large scale urban developments, public sector development and development in the countryside (including individual dwellings).

### Local Context

**6.51** Whilst transportation is the biggest individual consumer of energy at 40%, the domestic sector accounts for 29%, industry for 17% and the services sector accounts for 14% of overall energy consumption<sup>12</sup>. The introduction of renewable features into new buildings could reduce dependence of the residential, commercial and services sector on fossil fuels.

**6.52** Forms of micro-generation include solar panels, biomass and heat pump development. Some forms of micro-generation currently benefit from permitted development rights and therefore do not require express planning consent. As a result we do not have details of how widespread they are incorporated into new or existing buildings in the district. The NIHE has however indicated that renewable energy systems with a creditable track record for social housing include solar photovoltaic panels, solar thermal panels and biomass boilers. It is also further exploring the potential of ground source and air source heat pumps.

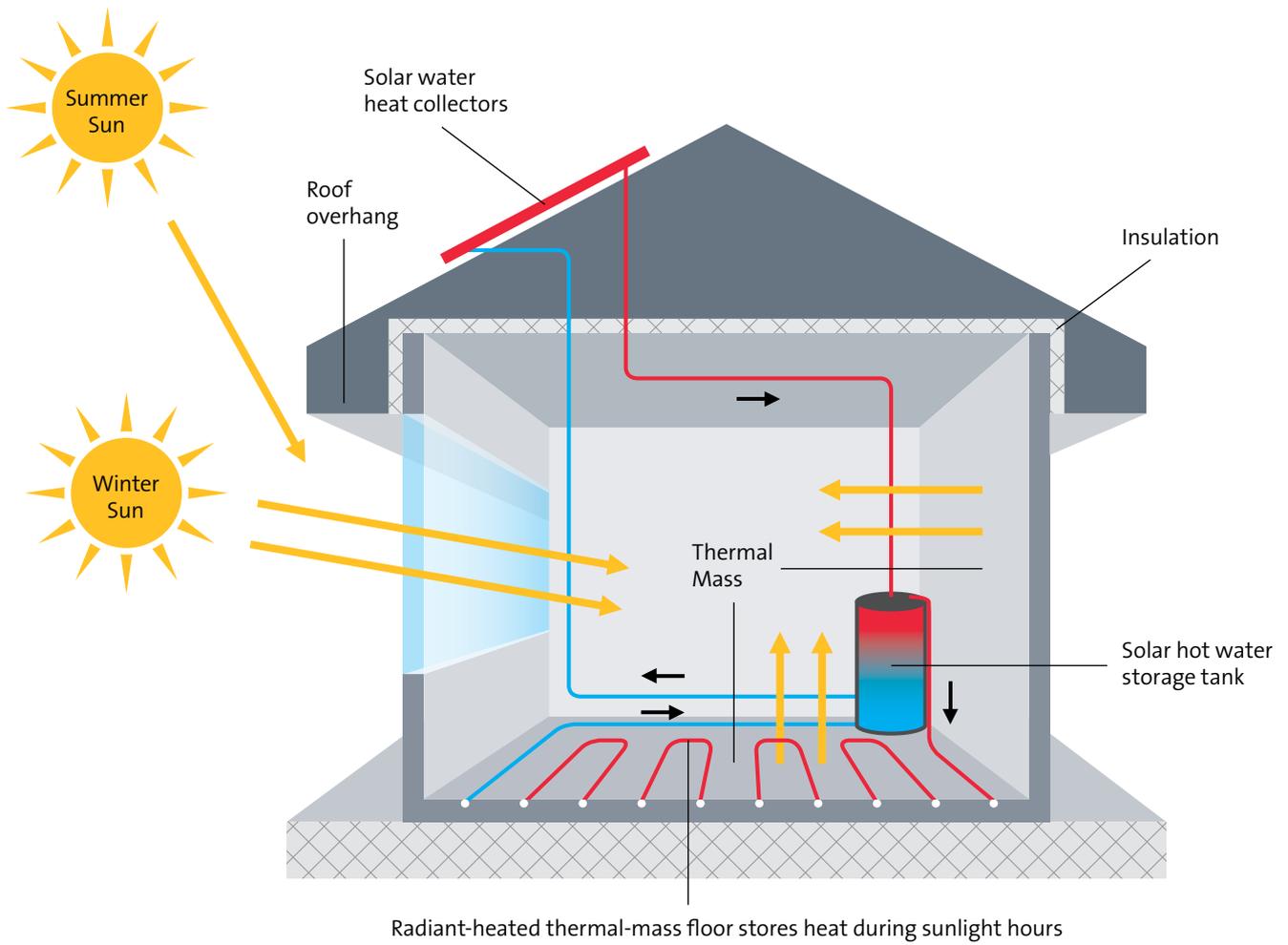
**6.53** Passive solar design refers to the use of solar energy for the heating and cooling of buildings. By making efficient use of this free energy, the need to artificially light, heat and ventilate a building is reduced, therefore reducing the building's energy consumption. This has the joint benefit of reducing fossil fuel consumption and expenditure on energy in the long-term. In residential developments this has the potential to reduce fuel poverty as the application of these principles in modern housing can reduce heating and lighting energy by 20-25%<sup>13</sup>.

<sup>11</sup> SPPS

<sup>12</sup> Department for Business, Energy & Industrial Strategy, Energy Consumption in the UK 2017.

<sup>13</sup> Best Practice Guidance to planning Policy Statement 18 'Renewable energy'.

Figure 8: The Principles of Passive Solar Design



Source: [www.alternative-energy-tutorials.com/energy-articles/passive-solar-energy.html](http://www.alternative-energy-tutorials.com/energy-articles/passive-solar-energy.html)

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**Local Development Plan****Key Issue 9 - Integrated Renewable Energy and Passive Solar Design**

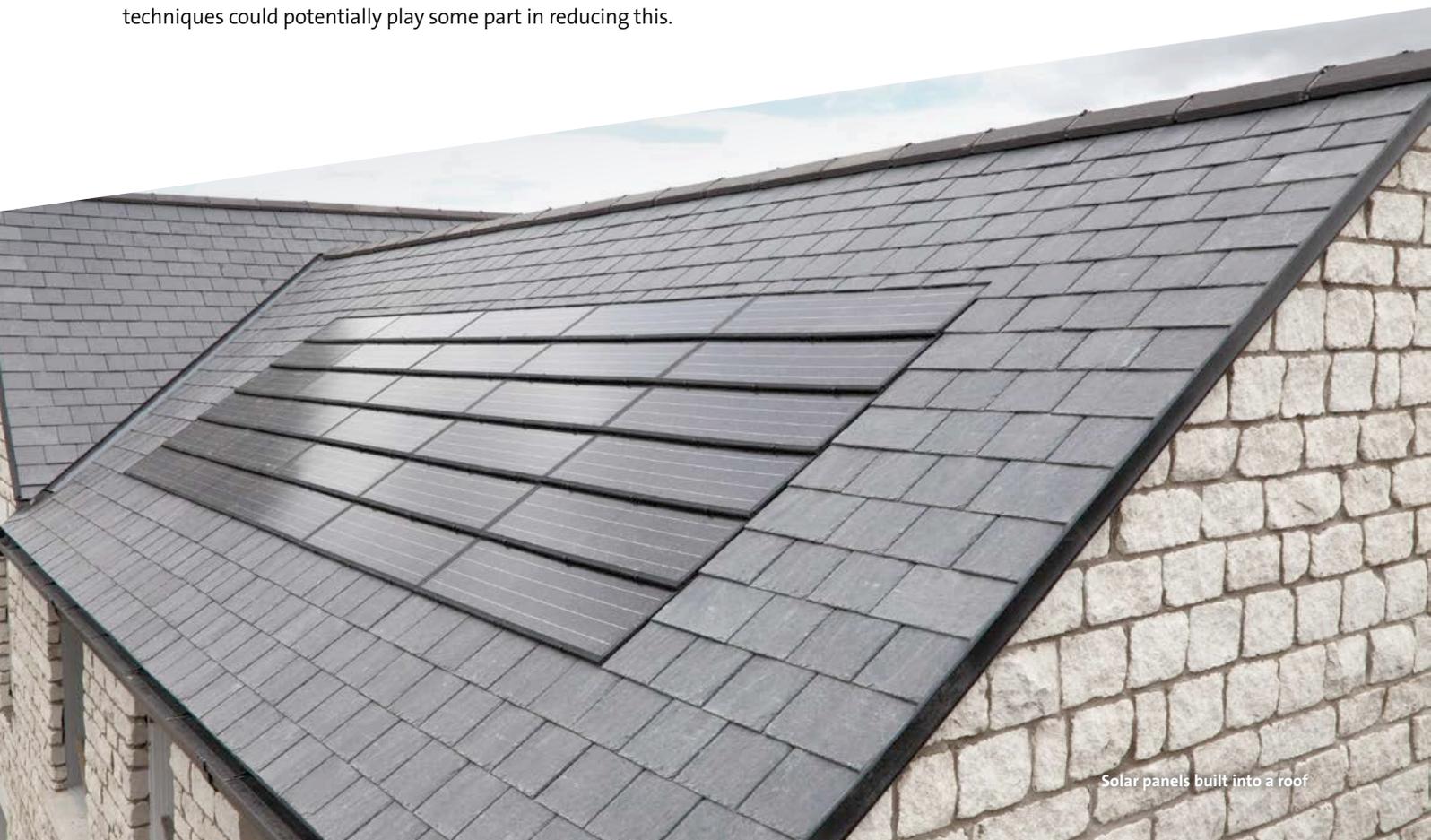
**6.54** Passive solar design techniques can be applied most easily to new buildings but existing buildings can also be adapted. Whilst passive solar building construction may not be difficult or expensive it is scientific and requires significant study to ensure effective results. It can also have significant impacts on the siting, orientation, spacing and appearance of buildings and landscape design which affect a developments ability to integrate effectively.

**6.55** A key outcome of the Community Plan is for all people in the district to benefit from a clean, quality and sustainable environment, an indicator in measuring this outcome will be the level of sustainable energy.

**6.56** The Community Plan also identified that in 2011 the district experienced an above average level of fuel poverty (43-46% of households) compared to the NI average of 42%. The integration of renewable energy technologies and passive solar design techniques could potentially play some part in reducing this.

**6.57** The benefits of employing the use of renewable energy technologies in the district are wide ranging and include economic, environmental and social benefits. Perhaps some of the more tangible or perceptible benefits that should be realised over time are:

- Improved air quality
- Reduced carbon emissions
- Reduced reliance on fossil fuels
- Provision of opportunities for innovation, employment and investment
- Increased diversity and security of energy supply
- Improved health and wellbeing and quality of life.



Solar panels built into a roof

# Options for Integrated Renewable Energy and Passive Solar Design

## Option 1

**The integration of renewable energy and passive solar design should be encouraged in all new development.**

This option would maintain the status quo as regional planning policy currently encourages the integration of renewable energy and passive solar design.

## Option 2

**The integration of renewable energy and/or passive solar design should be a requirement of certain new development, eg the public sector.**

This option extends beyond the current policy approach in that it will require the development of a new policy requiring the integration of renewable energy and/or passive solar design in, for example, public sector developments as they offer one of the greatest opportunities for maximising the benefits of these technologies and techniques.

The overall contribution of this option to reducing our dependence on fossil fuels is likely to be significantly reduced by the small number of these types of development that will be developed over the plan period.

## Option 3

**The integration of renewable energy and/or passive solar design should be a requirement in certain new development eg public sector and on private developments over a certain threshold.**

This could apply to larger residential developments and in the case of non-residential schemes sites over one hectare or buildings over 1000m<sup>2</sup>. It could also include development in the countryside including individual dwellings as these types of development have the most potential for employing these technologies and principles.

This option would ensure that these forms of technology and techniques, subject to other planning considerations of acknowledged importance, are incorporated into a wider range of developments. This should serve to increase the positive outcomes for the environment, economy and society.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that overall Option 3 scored more positively than Options 1 and 2 as it scored significantly positive for sustainable housing and positive for strengthening society in the long-term.

### Preferred Option:

## Option 3

### Justification

Option 3 would see the LDP act as a driver in seeking to ensure the district benefits from the numerous economic, environmental and social benefits resulting from renewable energy technologies and passive solar design techniques being incorporated into a greater number and type of new developments in the district.



- Q Do you agree with the Council's preferred approach? If not, why?
- Q Do you agree with the suggested types of development and the thresholds suggested in Options 2 and 3? If not, why?
- Q Are there any other options that should be considered?

**Social:**

Accommodating People, Improving Health and Wellbeing

## Key Issue 10

# Open Space Provision

**6.58** Open space is defined within regional planning policy as ‘all open space of public value, including not just land, but also inland water bodies such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and outdoor recreation and can also act as a visual amenity’<sup>14</sup>. The provision of open space has numerous social, economic and environmental benefits and requires consideration and assessment in the preparation of the LDP.

### Regional Policy Context

**6.59** The RDS aims to promote development which improves the health and wellbeing of communities. RG7 recognises the importance of promoting recreational space within cities, towns and neighbourhoods and new developments. It states that plans should make provision for adequate green and blue infrastructure. RG11 further promotes the protection and encouragement of green and blue infrastructure within urban areas. It also recognises built heritage is a key tourism and recreational asset.

**6.60** One of the SPPS’s core planning principles includes improving health and wellbeing. It states that planning authorities should contribute positively to improving our health and wellbeing through safeguarding and facilitating quality open space, sport and outdoor recreation and through providing safe and secure age-friendly environments. The SPPS highlights the fact that well designed buildings and successful places can have a positive impact on how people feel. The way in which places and buildings are configured, patterns of movement in the space around us and the level of access to quality open space are all factors that can contribute to our general wellbeing.

**6.61** The SPPS requires councils to bring forward an Open Space Strategy that must reflect the aims, objectives and policy approach of the SPPS, tailored to specific circumstances of the plan area. It also notes that the LDP should be informed by a survey/assessment of existing open space provision and future needs to include both public and private open space and identify the different needs they serve.

**6.62** The existing provision of open space in the plan area should be assessed against the National Playing Field Association (NPFA) recommended minimum standard (commonly referred to as the ‘6 acre standard’). This assessment should consider the level of provision as well as its distribution and accessibility.

**6.63** The SPPS and PPS8 set the following regional strategic objectives for open space, sport and outdoor recreation:

- Safeguard existing open space and sites identified for future such provision
- Ensure that areas of open space are provided as an integral part of new development and that appropriate arrangements are made for their management and maintenance in perpetuity
- Facilitate appropriate outdoor recreational activities in the countryside [the SPPS also adds: that do not negatively impact on the amenity of existing residents]
- Ensure that new open space areas and sporting facilities are convenient and accessible for all sections of society, particularly children, older people and those with disabilities
- Achieve high standards of siting, design and landscaping for all new open space areas and sporting facilities
- Ensure that the provision of new open space areas and sporting facilities is in keeping with the principles of environmental conservation and helps sustain and enhance biodiversity.

<sup>14</sup> Planning Policy Statement 8 ‘Open Space, Sport and Outdoor Recreation’ (PPS8)

**Social:**

Accommodating People, Improving Health and Wellbeing

## Local Development Plan

### Key Issue 10 - Open Space Provision

#### Local Context

**6.64** The district has a wide ranging provision of open space. This includes the Mourne Mountains, the Ring of Gullion and approximately 160km of coastline along Strangford Lough, Carlingford Lough and the Irish Sea. In addition the district benefits from several country estates, forest parks, walking trails, greenways, beaches and activity centres all of which provide a range of outdoor recreational opportunities and attract large numbers of visitors every day.

**6.65** There are a range of parks, sports facilities and children's play areas throughout the district and it is well served by a wide range of private recreational clubs including, soccer, rugby, cricket, gaelic games and golf. There is also a widespread provision of school playing fields which offer potential for community use. The Council is actively involved in community partnerships for the development and operation of recreational sites.

**6.66** Open space, particularly those based on the natural resources in the district, are important contributors to the character and appearance of the district. They encourage people to visit, live, work and invest in the district and as such can make a valuable contribution to the local economy. This is perhaps best demonstrated by the success of the tourism industry in the district. The district has also developed its activity based tourism which benefits from the variety of open space assets in the district.

**6.67** The provision of open space also has important benefits in terms of the environment. It provides for various habitats and species (many of which are protected and of local, national and international importance) and includes many of our natural features that make our landscape so distinctive. Within urban areas it also provides green lungs, visual breaks, opportunities for recreation and wildlife habitats.

**6.68** The two current development plans (BNMAP and ADAP) for the district identified the various resources and types of open space within the district based on the legacy Down and Newry and Mourne council areas. As required they also

calculated the provision of open space for the purposes of assessing provision against the NPFA standard for outdoor playing space. Both plans concluded there was a deficit in the legacy council areas. This deficit was projected to increase as a result of the projected growing population.

**6.69** It should however, be noted that the two plans used different methodologies to calculate the provision and as such no direct comparison is possible to provide an accurate representation of provision for the whole of the district.

**6.70** One of the key aims of the Community Plan is to improve the wellbeing of people in the district. The provision of open space plays an important role in contributing to the wellbeing, physical and mental health and quality of life of our population. As a result the Community Plan's thematic group for the environment and spatial development seeks to increase the promotion of both green and blue infrastructure and to promote and enhance access to the built and natural environmental assets. The Plan also seeks to better utilise community planning partners estates to create more green space which is open and accessible to all.



**6.71** A key vision of the Council's Corporate Plan is to 'facilitate and encourage healthy lifestyles'. It states that a key objective of the Council over the corporate plan period is to have 'supported improved health and wellbeing outcomes' by improving quality of life and reducing health inequalities, primarily through programmes, services and access to open spaces.

**6.72** The Council's Play Strategy is a five year strategy that will act as the guidance document to develop, if needed, or create a more efficient, effective play provision within the district. The strategy also gives guidance to the Council over the next five years where it is required to continue to monitor policy areas and develop those highlighted in areas which fall short of the play guidance detail.

**6.73** The Council's Sport Strategy is a ten year strategy that provides a framework for the future prioritisation, development and provision of sports facilities at local level, to meet identified community need. The strategy reflects the wider NI 10 year plan for the provision of strategic sports facility strategy for NI (2016), which focuses on the need for future provision that is of cultural significance, as well as those that provide for high performance training and competition. At a local level, the identification of need for sports facility provision is aligned to the Council's Corporate Plan and the community planning process.



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**Social:**

Accommodating People, Improving Health and Wellbeing

# Options for Open Space Provision

## Option 1

**Protect existing and zoned open space provision as identified in the BNMAP and the ADAP.**

This option maintains the status quo. However, due to differing methodologies used to calculate open space provision within the existing area plans, it is unclear how the provision of open space compares to the NPFA standards.

## Option 2

**Identify and evaluate current open space provision in the district. Protect existing and any subsequent additional land required for open space, sport and recreation.**

This option allows for a review of the current open space provision across the whole of the district. This would then be evaluated, using a single methodology, against NPFA standards. Existing open space and any additional lands identified to meet future needs would be protected.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 1 scored positively on many objectives including health and wellbeing, strengthening society, education and biodiversity while Option 2 scored significantly positive for these objectives. Option 2 also scored positively for active and sustainable travel while Option 1 scored neutral for this objective in the medium and long-term, making Option 2 more positive overall.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it offers the opportunity to identify and evaluate the current provision of open space across the district in an equitable way in addition to identifying any future need.



*Q* Do you agree with the Council's preferred option? If not, why?

7  
Economic



Castlenavan Quarry, Seaforde



Narrow Water, Warrenpoint

# 7. Economic: Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

**7.1** The third LDP theme, as set out in Chapter 4, focuses on economic issues. A number of the associated objectives under this theme underpin our Spatial Growth Strategy and are therefore addressed in Chapter 5. Those remaining economic objectives relevant to this section are as follows:

- To support the district as a major tourist destination whilst respecting its heritage assets and exceptional landscape setting
- To manage mineral resources in a sustainable manner
- To protect strategically important transportation routes
- Promote opportunities for sustainable travel including walking, cycling and public transport and reduce the need to travel by private car
- Accommodate investment in public utilities.

**7.2** Whilst there are economic challenges and uncertainties over the coming years as a result of the UK decision to exit the European Union, the district has an opportunity to build on its locational advantages with good infrastructure links and key regional tourist assets. These include Newry City's strategic position on the Belfast-Dublin corridor, together with the port of Warrenpoint, NI's second largest port, acting as a strong economic driver for the district. The district also has strong tourism growth potential through its wealth of tourism assets covering the natural and historic environment and a strong cultural heritage. The Council now has the means, through the LDP, to establish a planning framework more closely aligned to its economic needs and priorities for growth.

## Regional Policy Context

**7.3** The RDS and the SPPS set out the framework for sustainable economic growth and are introduced in Chapter 3. Chapter 5 considers the RDS and SPPS in the context of the Council's proposed spatial growth strategy. This chapter in turn considers the regional policy guidance in the context of each economic issue.

**7.4** Nine key issues and a range of associated options are identified where the LDP could potentially support economic development and protect land for key infrastructure proposals. These have been identified through our evidence base, engagement with key consultees as well as internal engagement with members and other Council departments. Broad economic characteristics of the district are contained within Chapter 2. This is supplemented within this chapter under each key issue with the evidence base that underpins each issue.

## Evidence base

### Key Statistics

- In 2017 8,110 VAT and/or PAYE registered businesses were located within the district, this represents 11.3% of the NI total and is the fourth largest share amongst the 11 councils. The majority (78.8%) employ less than five people<sup>1</sup>.
- Over half (51%) of overnight trips to the district are for holiday purposes, the second highest in NI after the Causeway Coast. Estimated expenditure on overnight trips in 2016 was £61million<sup>2</sup>.
- The reported value of aggregates extracted in 2011 was £4.7million, with 85% of this figure from greywacke (sandstone) reserves<sup>3</sup>.
- The district has a higher proportion of individuals who travel to work by car compared to the NI average (76% vs 73%)<sup>4</sup>.

<sup>1</sup> NISRA Inter Departmental Business Register 2017

<sup>2</sup> NISRA Local Government District Tourism Statistics 2016

<sup>3</sup> DETI 2011 Annual Minerals Return

<sup>4</sup> NINIS 2011 Census Key Statistics Summary Report

**Economic:**

Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

## Local Development Plan

### Economic: Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

**7.5** Statistics and data relating to the associated topics have been gathered and analysed from a number of sources including government agencies and internal departments within the Council. For further details relating to the evidence base please refer to the following LDP preparatory papers; Paper 3 (Employment and Economic Activity), Paper 5 (Transportation), Paper 7 (Tourism), Paper 9 (Public Utilities), and Paper 11 (Minerals).

**7.6** This section also considers utility provision across the district and how this may impact on economic growth.

#### Identification of Key Issues

**7.7** Nine key issues and a range of associated options are identified where the LDP could help to support economic growth across the district, support the transportation network, and promote more sustainable travel. These have been identified through our evidence base, engagement with key consultees as well as internal engagement with members and other Council departments.



# Key Issue 11

## Economic Development in the Countryside

### Regional Policy Context

**7.8** While Spatial Framework Guidance SFG13 of the RDS recognises the need to facilitate the development of rural industries, businesses and enterprises in appropriate locations it emphasises a sustainable approach to development with settlements being the primary focus for economic development.

**7.9** Both the SPPS and Planning Policy Statement 4: Planning and Economic Development (PPS4) state that in the interests of rural amenity and wider sustainability objectives the level of new building for economic development purposes outside settlements must be restricted. PPS4 Policy PED6 takes this further and applies strict control over development proposals for small rural projects. It details three key criteria that must be met and clarifies that in identifying a suitable site a sequential test must also be applied.

**7.10** The SPPS does not however carry forward all of the detail of PPS4 Policy PED6 and allows for a small scale new build economic development proposal where there is no suitable site within the settlement. The more restrictive sequential test, as contained within PPS4, has thus been excluded from the SPPS, allowing the Council a limited degree of flexibility in bringing forward policies for economic development in the countryside.

### Local Context

**7.11** The Council's Economic, Regeneration and Investment Strategy 2015-2019 highlights that the district is very much a micro-enterprise economy with the majority of business in the area employing less than 10 people. The 2017 Inter-Departmental Business Register published by NISRA highlights that within the district the majority of businesses are classified as being micro, employing less than five people (78.8%) compared to the regional average of 75.1%. Some 29.5% of businesses in the district have a turnover of less than £50,000 placing them under the current VAT threshold of £82,000. This compares with 27.4% for NI as a whole<sup>5</sup>. This illustrates the importance of small business to the local economy.

**7.12** There is a higher proportion of people in self-employment than there is for NI generally, around 11.37% for the district and around 8.88% for NI. The area has the third highest share of self employed in the economically active population across the 11 councils. This is indicative of the strong entrepreneurial spirit in the area.

<sup>5</sup> NISRA Inter-Departmental Business Register

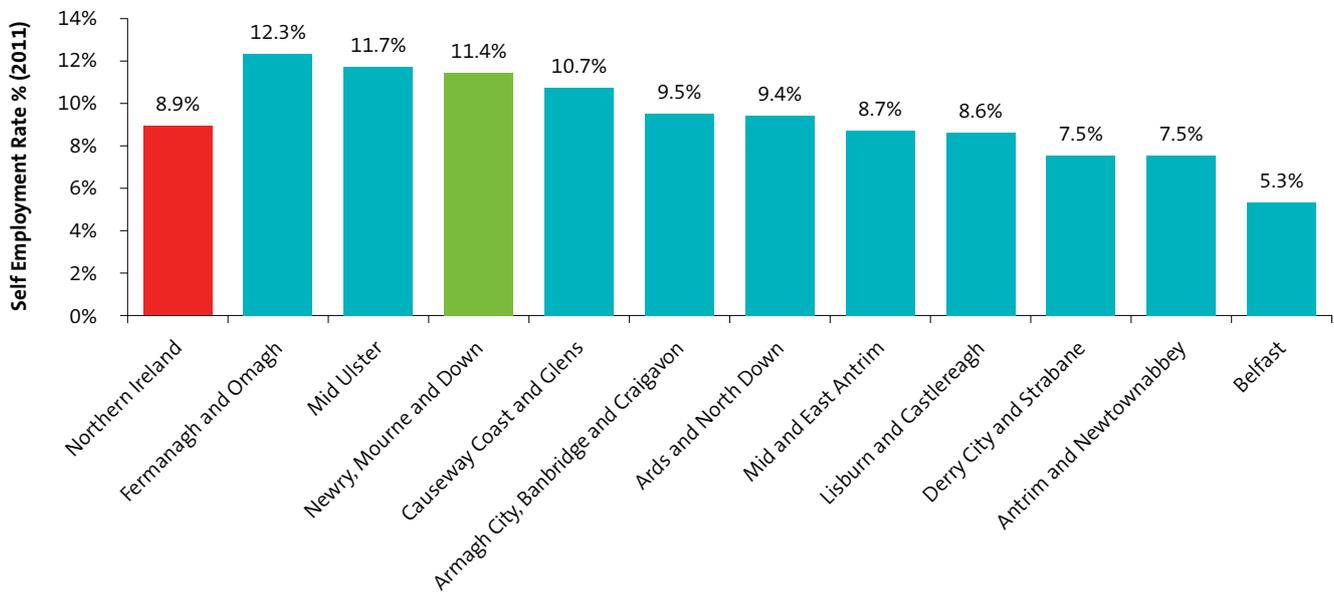
**Economic:**

Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

## Local Development Plan

### Key Issue 11 - Economic Development in the Countryside

Figure 9: Self-employment Rate across 11 Local Government Districts 2011



Source: NISRA Inter-Departmental Business Register

**7.13** As highlighted in LDP Preparatory Paper 3 - Employment, changes in farming and fisheries suggest that employment in the primary sector is likely to continue to decline, therefore there is a need to see how planning policy can support employment opportunities in the rural area.

**7.14** As highlighted within Chapter 5 the district would appear to have sufficient employment land to meet its needs over the plan period. The zoning of land in larger settlements (Newry City and the district's towns) together with the identification of Industrial Policy Areas in villages is one mechanism for supporting business growth. However, additional mechanisms that meet the district's range of business needs, particularly small scale rural enterprises, must also be considered.

**7.15** The development of identified employment lands across the district has been slow in recent years, as previously outlined, and can pose significant start-up costs for any business looking to identify a suitable site and establish premises. In the same way as Invest NI can offer fully serviced sites within the district to its client companies there is a need to consider the site needs of small enterprises and start-ups. The Council considers that reference to a 'suitable site' (see paragraph 7.10 above) within the context of the SPPS must, in respect of start-up businesses, be interpreted as the availability of serviced units. The district's principal business parks, containing a range of serviced units, are outlined in Table 7:

Table 7: Principle Business Parks across the District

Business Park Location	Range of Serviced Units
Win Business Park, Newry	500 – 5,000 sq ft
Warrenpoint Enterprise Centre	800 – 2,500 sq ft
Flurrybridge Enterprise Centre, Jonesborough	1,200 – 2,400 sq ft
Kilkeel Enterprise Centre	1,000 – 2,000 sq ft
Down Business Centre, Downpatrick	300 – 2,000 sq ft
Forkhill Enterprise Centre	500 – 1,000 sq ft
Carnbane Business Park, Newry	1,500 – 110,00 sq ft*
Greenbank Industrial Estate	1,500 – 110,00 sq ft*
Killough Road Industrial Estate, Downpatrick	1,500 – 55,000 sq ft*
Carneyhaugh Business Park, Newry	5,000 – 15,000 sq ft*
Cloghogue Business Park, Newry	2,500 – 29,000 sq ft *
Cowans Business Park, Camlough	2,000 sq ft *

*\*Estimates based on a desktop review*

#### 7.16 The Council's Planning and Economic Development

Departments will seek to support the provision of suitable serviced units across the district and promote a sustainable approach to economic development. This could be augmented through bringing forward an enhanced policy on economic development in the countryside that would allow for the development of small scale workshop style development where it was demonstrated that a suitable serviced site for example within an existing business park, was not available (see Option 2).

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# Options for Economic Development in the Countryside

## Option 1

**Adopt existing policy as set out in Planning Policy Statement 4: Planning and Economic Development (PPS4) in respect of economic development in the countryside.**

Adopt the policy approach as set out in PPS4 which:

- Allows for controlled expansion of existing industry in the countryside.
- Prohibits new business start-ups in rural areas.

## Option 2

**Consider scope under the SPPS to allow a more flexible approach.**

Currently the SPPS states “A small scale new build economic development project may be permissible outside a village or small settlement where there is no suitable site within the settlement.”

This option would explore the potential to:

- Provide small scale workshop style development in the countryside which is ancillary to an existing dwelling. Small scale would be defined in terms of the floor space of the development which is ancillary to an existing dwelling. A floor space restriction of 100m<sup>2</sup> could be applied.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 2 is the most sustainable option in respect of the social and economic sustainability objectives. While economic development in the countryside can place pressure on material assets and physical resources, Option 2 is considered to be limited in extent and the impact could be mitigated as the criteria would permit only small businesses. In terms of the environmental sustainability objectives, Option 2 performs less positively than Option 1, however the social and economic benefits for this option are considered to outweigh the reduced environmental benefits.

### Preferred Option:

## Option 2

### Justification

Option 2 is considered to be the preferred option as this will provide further support to start-up businesses across the district and will help to expand the district's business base.



*Q* Do you agree with the Council's preferred approach? If not, why?

*Q* What do you consider to be an acceptable floor space restriction for small scale economic development projects in the countryside?

**Economic:**

Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

## Key Issue 12

# Alternative Uses on Land Zoned for Economic Development

### Regional Policy Context

**7.17** The RDS under Regional Guidance RG1 states that land zoned for economic development use in development plans should be protected as it provides a valuable resource for local and external investment, thereby contributing to the aims of the Programme for Government. Protection of such zonings should ensure that a variety of suitable sites exists across NI to facilitate economic growth.

**7.18** The SPPS reflects the wording of the RDS and reiterates that economic development land is a valuable resource which should be protected from other forms of development to ensure there is an ample supply of suitable land to meet economic development needs within the district. Within larger settlements the LDP may zone individual sites for a particular industrial and business use class, (i.e. Class B1 Business, Class B2 Light Industrial, Class B3 General Industrial and Class B4 Storage and Distribution<sup>6</sup>). The LDP may also set out restrictions as to where particular types of economic development should be located to meet particular plan objectives. For example, office use may be restricted to town or district centres in order to promote vitality and viability of the centre.

### Local Context

**7.19** There have been instances across the district of development proposals seeking to use lands zoned for economic development for uses outside the remit of the traditional industrial and business uses. Proposals continue to come forward and it can be difficult for the Council to resist because of the low take up of land by the target use. These uses seek locations in industrial estates because of the availability of large buildings with lower rates than town centres with free parking in close proximity to the premises. However, there are implications with allowing these types of development. They can give rise to incompatibility issues and make it more difficult for Class B3 General Industrial use to find a suitable location that will not negatively impact on an adjoining use. Furthermore permitting these types of use has implications for the vitality and viability of our town centres drawing away uses that would otherwise have located within the town centre.

**7.20** The LDP should seek to address this issue and consider what types of uses should be permitted on economic development lands. A summary of the current level of zoned economic development land across the district is contained in Chapter 5.

<sup>6</sup> The Planning (Use Classes) Order (Northern Ireland) 2015

# Options for Alternative Uses on Land Zoned for Economic Development

## Option 1

### Status Quo

Safeguard land zoned for economic development for industrial, business and storage and distribution uses only.

This option seeks to ensure that zoned economic development lands are protected in line with existing planning policy. No consideration is given to alternative compatible uses that could potentially locate within these areas without detrimental impact on existing uses.

## Option 2

### Degree of Flexibility

Allow a limited number of alternative compatible use(s)/ business(es) falling outside Part B 'Industrial and Business Use' of the Planning (Use Classes) Order (NI) 2015 within zoned economic land. Potential uses could include sale of motor vehicles, use as a scrapyards, breaking of motor vehicles and the storage and distribution of minerals.

This option could allow for additional uses that would be compatible with most industrial and business uses but may give rise to amenity issues if they were to be located elsewhere. There would be a requirement that the business demonstrate that the proposal would be compatible with existing economic development uses.

## Option 3

### Greater Flexibility

Allow retail, commercial, leisure and other alternative uses falling outside Part B within zoned economic land subject to the adoption of a sequential approach ensuring that city/town centres are considered first and the proposed use demonstrates a support function to existing economic uses.

The danger with Option 3 is that it undermines our town centres by permitting uses that should be directed to these centres. Economic development lands are frequently located at the edge of settlements. By permitting uses that should be directed to our town centres it reduces footfall to the town centres and offers less opportunity for business to benefit from passing trade. Rather than protecting and enhancing our town centres this option would actively support their decline.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Options 1 and 2 have a strong positive effect on sustainable economic growth. The greater flexibility afforded by Option 2 means it delivers slightly more for the economic growth objective than option 1 and is consequently the more sustainable of the two options. Option 3 may bring minor benefits to health and wellbeing by, for example, allowing gyms and leisure sites to be located closer to workplaces. However, in turn this may have a minor negative effect on strengthening society if it directs people and shared space away from town centres. Option 3 also risks the deterioration of economic growth in town centres.

### Preferred Option:

## Option 2

### Justification

Option 2 would ensure an adequate supply of land for economic development across the district whilst a degree of flexibility would allow appropriate alternative uses within zoned lands.



**Q** Do you agree with the Council's preferred option that a limited number of alternative uses should be permitted on zoned economic lands? If so, what should be permitted? If you do not agree, why?

## Key Issue 13

# Tourism Development

**7.21** Tourism makes a vital contribution to the local economy in terms of the revenues it generates, the employment opportunities it provides and the potential it creates for economic growth. As well as direct spending on holiday accommodation and use of tourist amenities, tourism plays an important role in helping to support the viability of many local suppliers, services and facilities. Tourism development can improve assets and provides infrastructure for local people and tourists, supporting the vibrancy of the areas culture and heritage and sustaining local communities.

**7.22** Through utilising existing environmental, historical, cultural and geographic assets, tourism can be a key economic driver capable of stimulating further growth and development opportunities. Tourism can benefit the assets on which it depends for example through assisting in the financing of conservation or enhancement initiatives. In towns and cities tourism can contribute positively to urban regeneration. In rural areas, tourism is important to the development of the rural economy in many ways by, for example, offering opportunities for farm diversification.

### Regional Policy Context

**7.23** Through regional guidance, the RDS seeks to promote a sustainable approach to the provision of tourism infrastructure by:

- Promoting a balanced approach that safeguards tourism infrastructure while benefiting society and the economy
- Improving facilities for tourists in support of the tourist signature destinations, including The Mournes and the St. Patrick and Christian Heritage Trail, as identified in the former Department for Enterprise, Trade and Investment's draft Tourism Strategy 2010
- Encouraging environmentally sustainable tourism development.

**7.24** The RDS also seeks to conserve, protect and where possible, enhance our built heritage and our natural environment which are key assets for attracting tourism and would continue to make a valuable contribution to our tourism economy, as well as to the wider environment and society.

**7.25** The regional strategic objectives for tourism as set out in the SPPS are:

- Facilitate sustainable tourism development in an environmentally sensitive manner
- Contribute to the growth of the regional economy by facilitating tourism growth
- Safeguard tourism assets from inappropriate development
- Utilise and develop the tourism potential of settlements by facilitating tourism development of an appropriate nature, location and scale
- Sustain a vibrant rural community by supporting tourism development of an appropriate nature, location and scale
- Ensure a high standard of quality and design for all tourism development.

**7.26** Both the SPPS and Planning Policy Statement 16: Tourism (PPS16) state that in the formulation of LDPs councils should consider how best to facilitate the growth of sustainable tourism. The LDP should contain a tourism strategy and this should address the following:

- How future tourism demand is best accommodated
- Safeguarding of key tourism assets
- Identification of potential tourism growth areas
- Environmental considerations
- Contribution of tourism to economic development, conservation and urban regeneration.

**Economic:**

Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

## Local Development Plan

### Key Issue 13 - Tourism Development

#### Local Context

**7.27** One of the Council's key strategic objectives is for the district to become one of the premier tourism destinations on the island of Ireland. This will be through ensuring that we have a cultural and tourism infrastructure that will attract and serve the expectations of a growing number of local and international visitors.

**7.28** Key actions identified in the Council's Corporate Plan include:

- Establishing a recognised tourism brand for the district
- Working with Tourism NI, Tourism Ireland and other key stakeholders to review and improve tourism infrastructure
- Exploring the potential for Geotourism along the east coast/ border areas
- Reviewing the tourism infrastructure of Newcastle.

**7.29** A key outcome of the Community Plan is that all people in Newry, Mourne and Down benefit from prosperous communities. The level of tourism revenue in the district has been identified as an indicator for achieving this outcome with the level of overnight visitors, average spend per trip by visitors and hotel occupancy level being used to measure progress.

**7.30** The Council's Tourism Strategy is a five year strategy that sets out the strategic direction for the tourism industry within the district. This Strategy aims to maximise tourism growth for the district by adopting a fresh approach focused on recognising what makes the district distinctive and sets it apart from other destinations. The vision of the strategy is: By 2021 'NMD is a premier, year-round mountain and maritime destination in Ireland recognised for its EPIC (Experiential, Personalised, Iconic and Immersive and Creative) experiences in outdoor adventure, its rich tapestry of cultural heritage, myths and unique stories and its authentic local life'. The Strategy emphasises that tourism is everyone's business and there is a need for collaboration for the long-term growth of the tourism economy.

Table 8: Estimated Number of Overnight Trips/Nights and Expenditure in Newry, Mourne and Down and Northern Ireland 2014-2016

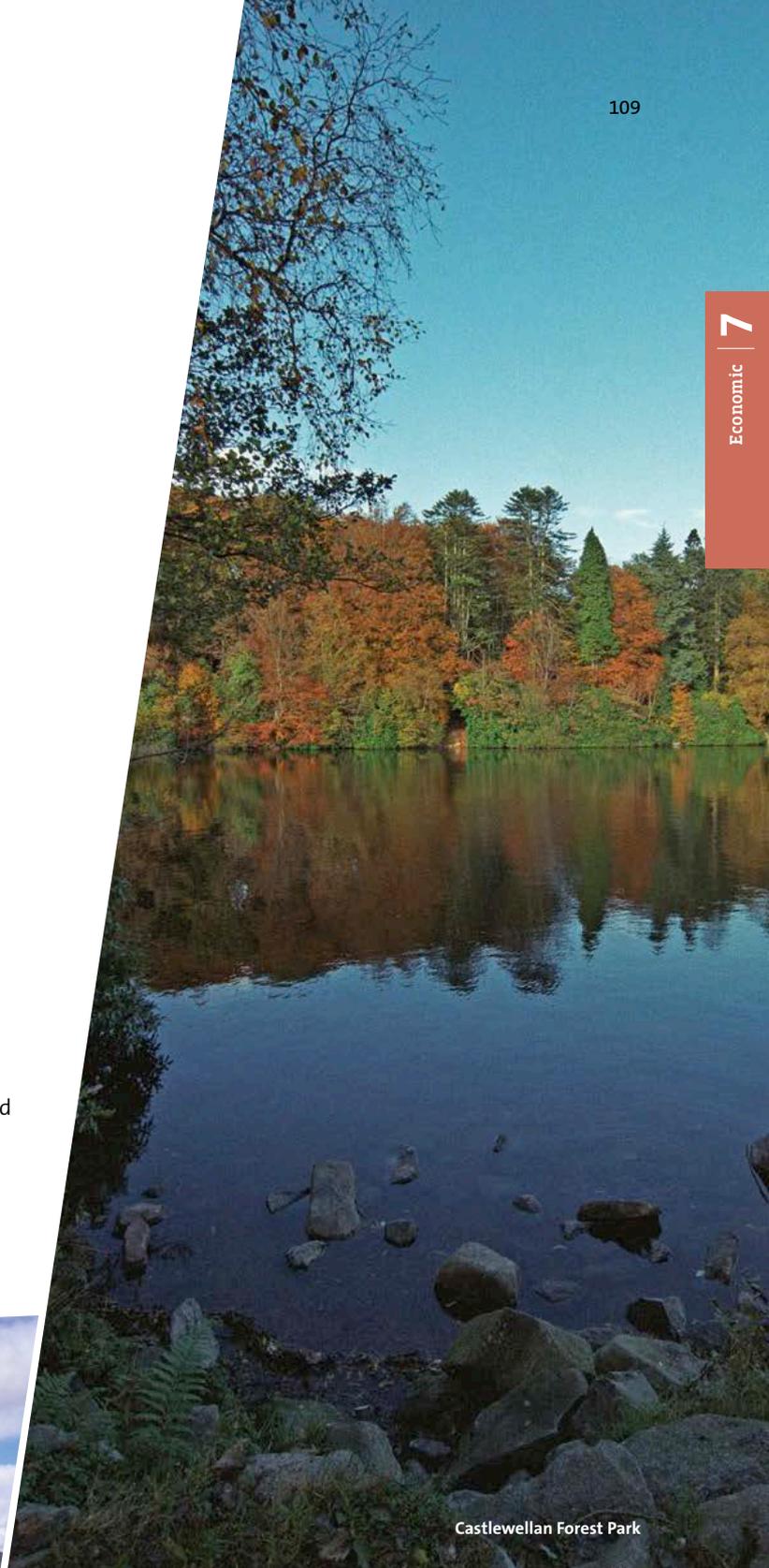
	2014		2015		2016	
	NI	NMD	NI	NMD	NI	NMD
<b>Trips</b>	4,643,942	571,238	4,657,109	406,301	4,725,242	571,400
<b>Nights</b>	15,082,370	1,490,653	15,470,769	1,060,063	15,179,818	1,562,073
<b>Spend</b>	744,902,295	53,643,562	764,066,271	48,071,493	850,707,668	60,978,919

Source: NISRA & NINIS

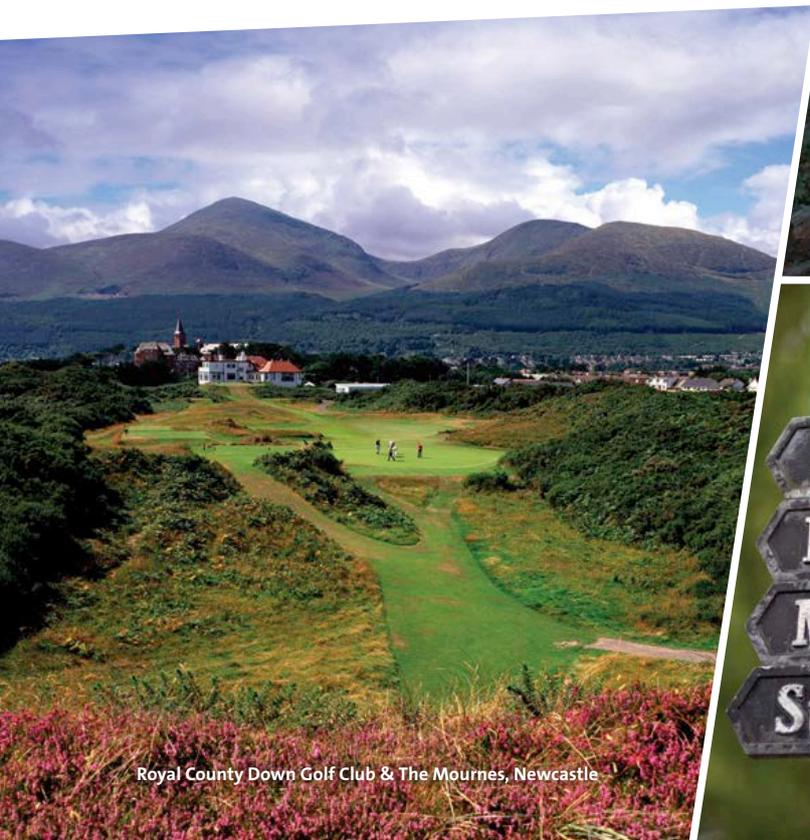
<sup>7</sup> <https://www.nisra.gov.uk/publications/local-government-district-tourism-statistics-publications>.

**7.31** Tourism statistics for 2016<sup>7</sup> indicate that the district appears to be performing well when assessed against the other 10 council areas. The district is ranked in third place behind Belfast and Causeway Coast and Glens LGD's in terms of overnight trips, nights and expenditure (see Table 8 below). With regards to the number of available rooms and estimated numbers of rooms sold in hotel accommodation 62% of all available rooms were sold, a 7% rise from the 2015 figure of 55%. Despite performing well under these indicators, none of the district's visitor attractions feature in the top 10 list of NI visitor attractions for 2016.

**7.32** The district benefits from a wealth of built, natural and cultural heritage assets including its link to St Patrick, all of which are strong incentives in attracting visitors. It is recognised for its adventure and outdoor based recreation and further potential for growth exists.



Castlewellan Forest Park



Royal County Down Golf Club & The Mourne, Newcastle



Downpatrick Signage

**Economic:**  
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# Local Development Plan

## Key Issue 13 - Tourism Development



Map 5: The District's Tourism Assets

Source: [visitmournemountains.co.uk](http://visitmournemountains.co.uk)

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**7.33** The district offers numerous locations and opportunities for hiking and walking, with the Mourne alone containing 12 mountain peaks including Slieve Donard, NI's highest mountain. Two of NI's three National Mountain Bike Trails are located in the district at Rostrevor and Castlewellan. With approximately 160km of coastline the district also offers a range of water-based leisure activities.

**7.34** The district therefore has a broad range of tourism assets and there is the potential through the Council's LDP to enhance the existing tourism infrastructure and support the growth of the tourism sector.



Dundrum Bay

**Economic:**

Creating Jobs, Promoting Prosperity and Supporting the Transportation Network and Other Infrastructure

# Options for Tourism Development

## Option 1

**Retain existing policy led approach as set out within PPS16 with minor amendments.**

This option would retain the status quo with regards to tourism policy and would allow for a limited range of tourism development outside settlements.

## Option 2

**As per Option 1 and in addition bring forward Tourist Opportunity Zones.**

The identification of Tourist Opportunity Zones would give the Council the means to actively enhance the district's tourist infrastructure in particular areas. This would identify tourism sites for attractions and accommodation to promote opportunities for dedicated sustainable tourism options over the plan period, for example, Kilbroney Park, Cranfield and Delamont Country Parks.

Tourist Opportunity Zones are considered to offer opportunities for the development of a range of appropriate quality tourism and recreation schemes to build on the existing tourism base, and enhance the tourism product. These would generally be outside urban and rural settlements.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 2 has a positive effect on the social sustainability objectives of health and wellbeing and strengthening society, as well as sustainable economic growth but mixed impact across the environmental objectives. Option 2 is expected to bring strong positive effects in the medium to long-term on the built and cultural heritage objective.

Option 1, which is largely based on the existing policy, delivers minor positive effects on many of the social, economic and environmental sustainability objectives. However, the absence of a spatial element which encourages focused and appropriate tourism development means that it does not deliver as much for the social and economic objectives as Option 2.

### Preferred Option:

## Option 2

### Justification

Option 2 would facilitate appropriate tourism related development close to key tourism assets within the district, facilitating growth in line with the Council's Corporate Plan and Tourism Strategy.



**Q** Do you agree with the Council's preferred option to identify Tourist Opportunity Zones? If not, why?

**Q** Are there any areas you feel should be designated as Tourist Opportunity Zones?

**Economic:**

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## Key Issue 14

# Minerals Development

**7.35** The minerals industry plays a vital role in the economic development of NI providing raw materials for the construction, manufacturing, energy creation and agricultural sectors. Each of these sectors generates employment and stimulates other parts of the economy. Minerals development can however have an adverse environmental impact and there is therefore a need to balance economic needs whilst protecting the natural environment.

### Regional Policy Context

**7.36** The Sustainable Development Strategy recognises that while it is important that we respect the limits of our natural resources and ensure a high level of protection and improvement of the quality of our environment, 'sustainable development' does not prevent us from using and capitalising on such resources.

**7.37** The SPPS acknowledges that there are a number of challenges arising from mineral developments that fail to be addressed through the planning system. There can be significant adverse impacts on the environment and on the amenity and wellbeing of people living in proximity to operational mineral sites. The restoration of sites upon completion of work associated with the extraction and processing of materials is another challenge.

**7.38** The SPPS's regional objectives for mineral development are to:

- Facilitate sustainable minerals development through balancing the need for specific mineral development proposals against the need to safeguard the environment
- Minimise the impacts of mineral development on local communities, landscape quality, built and natural heritage, and the water environment
- Secure the sustainable and safe restoration, including the appropriate re-use of mineral sites, at the earliest opportunity.

**7.39** The policy approach for minerals development must be to balance the need for mineral resources against the need to protect and conserve the environment. The SPPS states that, in preparing LDPs, the Council should bring forward appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the plan area. In particular, LDPs should:

- Ensure that sufficient local supplies of construction aggregates can be made available for use within the local, and where appropriate, the regional market area and beyond, to meet likely future needs over the plan period
- Safeguard mineral resources<sup>8</sup> which are of economic or conservation value, and seek to ensure that workable mineral resources are not sterilised by other surface development which would prejudice future exploitation
- Identify areas (normally referred to as Areas of Constraint on Minerals Development) which should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). There should be a general presumption against minerals development in such areas. However, where a designated area such as an AONB covers expansive tracts of land, the LDP should carefully consider the scope for some mineral development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation.

**7.40** The SPPS does not operate a presumption against the exploitation of valuable minerals. However, where a site is close to a statutory policy area, due weight will be given for the reason for that zoning.

<sup>8</sup> The safeguarding of mineral resources can be done through the LDP process through the designation of mineral safeguarding zones.

## Local Context

**7.41** At present, the district is covered by two separate development plans (BNMAP and ADAP). The BNMAP does not operate an Area of Constraint on Mineral Developments across its area whilst the ADAP does. There are currently no areas identified for safeguarding mineral developments on either plan.

**7.42** 55.7% of the district is designated as an AONB. In addition, the Council area contains many other environmental designations which include Special Protection Areas, Special Areas of Conservation, Ramsar Sites, Nature Reserves and Areas of Special Scientific Interest.

<sup>9</sup> NI Census 2011

## Minerals and the Local Economy

**7.43** In economic terms, more than 250 people are directly involved in various active mineral workings within the district<sup>9</sup>. The Department for the Economy's 2016 Annual Mineral Statement highlights that the value of the aggregates extracted in 2016 had a value of £4.18million, with over 85% of that figure accounted for by the relatively high value greywacke (sandstone). The remainder of the value is primarily made up of basalt and igneous rock (other than granite) and sand and gravel. Figures from the Quarry Products Association for Northern Ireland (QPANI) indicate that minerals, after processing, are worth approximately £25 million to the District's economy each year. These figures may still reflect a low level of construction and demand for aggregates are likely to increase as the economy improves and the number of construction and infrastructure projects increase.



Castlenavan Quarry, Seaforde

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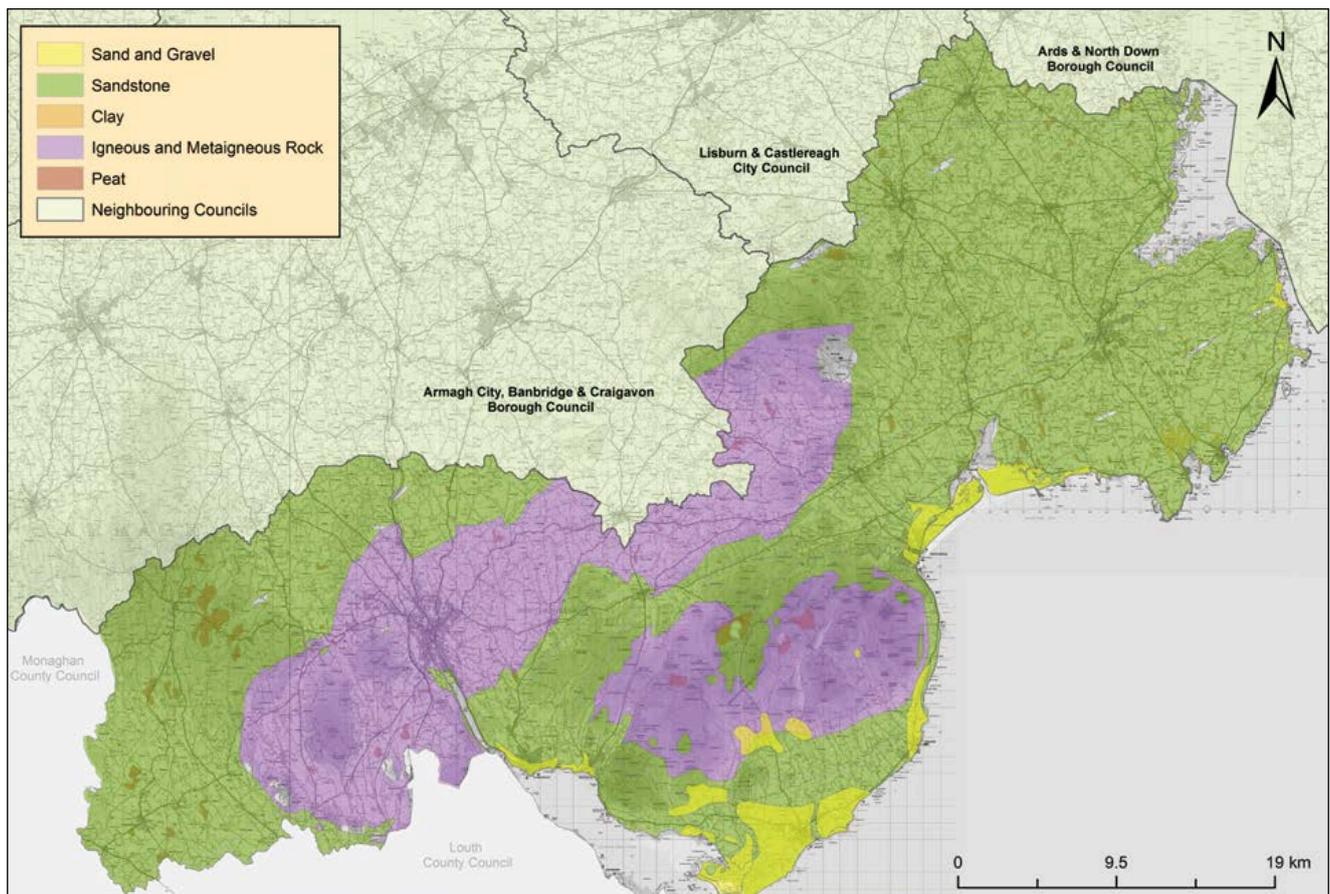
## Local Development Plan

### Key Issue 14 - Minerals Development

#### Extent of Minerals Deposits across the District

7.44 Map 6 shows the mapped and inferred distribution of aggregate resources within the district, as produced by the British Geological Survey (BGS) Mineral Resource Maps for Northern Ireland (2012). This map indicates the location

of the resources over the region as either continuous rock units or discrete, near surface packages. It does not take into consideration any infrastructure (roads and buildings) or water features (rivers and lakes) which would restrict or make impossible the exploitation of these resources (sterilisation).

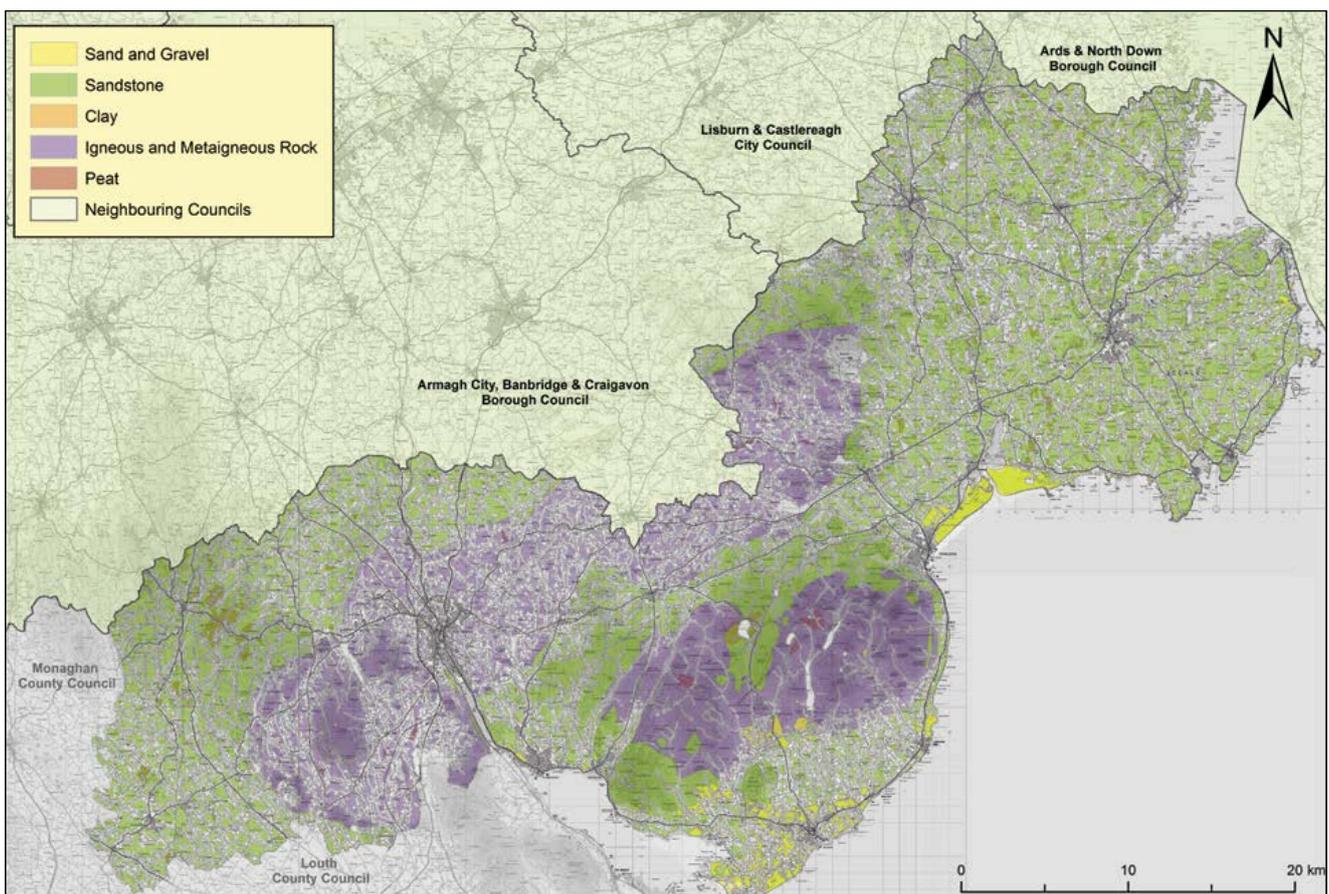


Map 6: Mineral Resources within Newry, Mourne and Down

Source: British Geological Survey  
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**7.45** In order to determine the true extent of viable mineral resource deposits a mapping exercise was carried out to remove these unworkable areas from the resource packages. In addition, areas considered too small to be economically viable due to the ‘fracturing’ of resources by surface development or watercourses have also been removed.

**7.46** Map 7 demonstrates the resource area remaining once surface sterilisation and fracturing of resources have been taken into consideration. The exclusion of sites located within an AONB has also been taken into consideration as shown in figures 10 and 11.



Map 7: Mineral Resources with Surface Development and Water Features Removed

Source: British Geological Survey  
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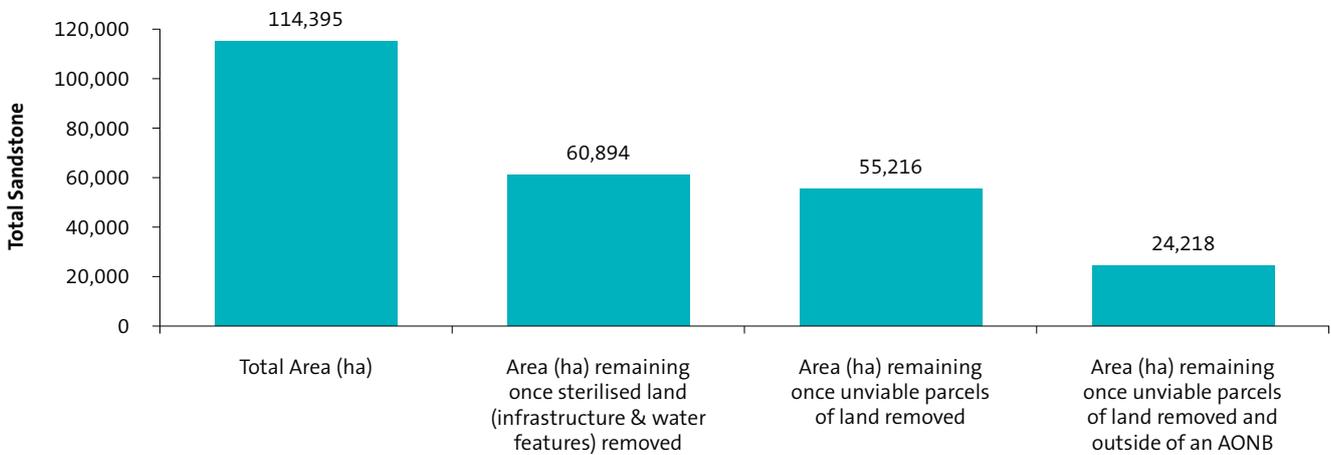
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## Local Development Plan

### Key Issue 14 - Minerals Development

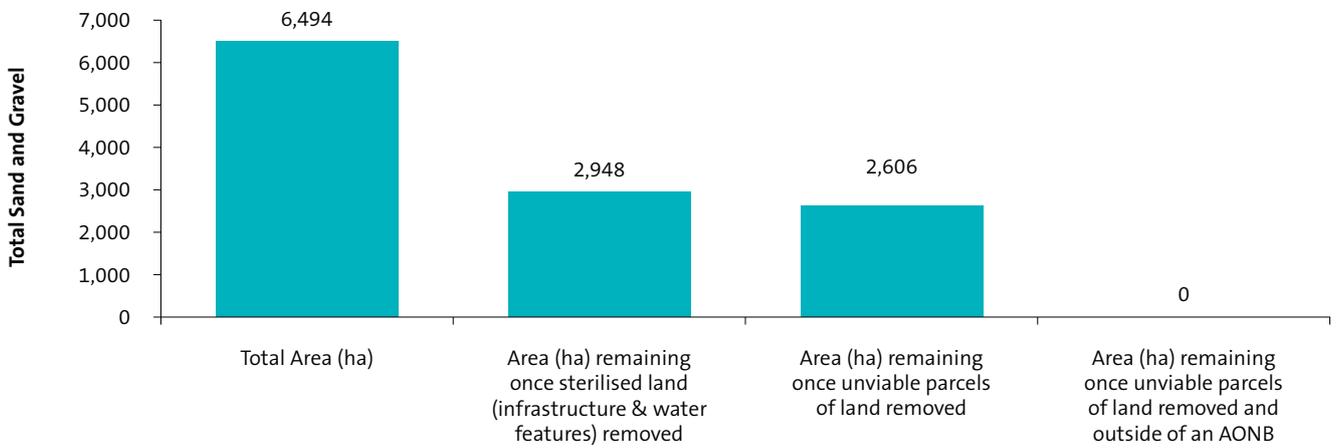
Figure 10: Extent of Sandstone Resources within the District



Source: British Geological Survey

**7.47** As can be seen from Figure 10, the availability of relatively high value greywacke sandstone resource (which contributes 85% of the quarry return by value) is reduced by over 51% once surface development, watercourses and unviable parcels of land are removed. In relation to sand and gravel, over 59% of the total resource area is lost. Also, virtually all of the district's sand and gravel resource is located within a designated AONB. If sandstone resources within an AONB were to be restricted by policy; 78% of that total potential resource could be inaccessible. These factors are important when determining if Areas of Constraint on Mineral Development are to be imposed and the potential impact these could have upon the supply of resources and any subsequent impact upon the local economy.

Figure 11: Extent of Sand and Gravel Resources within the District



Source: British Geological Survey



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# Options for Minerals Development

## Option 1

**Adopt a policy led approach in relation to Minerals Development.**

This option involves all applications for mineral development within the district being determined against a criteria based policy and if the proposal meets the criteria then it will be acceptable. Such a policy may take account of factors such as landscape character, residential amenity, safety, natural and built heritage. No Areas of Constraint on Mineral Development or Mineral Safeguarding Zones would be identified.

## Option 2

**As per Option 1 but in addition adopt Areas of Constraint on Minerals Development.**

This would seek to protect valuable landscapes, such as land within AONBs, Areas of High Scenic Value and Archaeological Interest.

## Option 3

**As per Option 1 but also identify Mineral Safeguarding Zones.**

This would use evidence from the British Geological Survey maps to help to protect mineral resources which are of economic or conservation value and seek to ensure that workable mineral resources are not sterilised by other surface development which would prejudice future exploitation.

## Option 4

**As per Option 1 but also include a combination of both Areas of Constraint on Minerals Development and Mineral Safeguarding Zones.**

This approach would seek to protect mineral deposits from surface sterilisation as well as protecting the district's valuable landscapes. Currently the Newry and Mourne side of the district has no Area of Constraint on Mineral Development designated and the Council has no evidence to suggest that the absence of this layer of protection has resulted in any significant loss of landscape quality. This option may therefore inhibit minerals development for no discernible environmental gain.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that the criteria based approach of Option 1 helps to avoid negative effects on environmental objectives but any effects on sustainable economic growth are uncertain, as it does not provide safeguarding from resource fragmentation and may undermine assets which are important for tourism.

The restrictive nature of Option 2 results in minor positive scores for many of the environmental objectives but these do not outweigh the negative effects, particularly on sustainable economic growth and physical resources.

Under Option 3 the identification of mineral safeguarding zones in appropriate locations will help to safeguard the future operation of the minerals industry, bringing significant positive effects to the sustainable economic growth and physical resources objectives. The criteria based policy approach of this option helps to minimise negative effects on the environmental sustainability objectives, making Option 3 the most sustainable option.

Option 4 seeks to create a more balanced approach through Areas of Constraint and Mineral Safeguarding Zones. Whilst this would safeguard minerals development in certain areas, there would still be considerable spatial restrictions and it may not be able to make the best use of location in all cases. Although this is also a sustainable option, it does not deliver the strong positive effects that Option 3 does.

### Preferred Option:

## Option 3

### Justification

Option 3 would afford protection to the district's landscapes through existing minerals policies and associated mitigation measures while also ensuring a supply of raw materials from within the district for present and future need.



- Q Do you agree with the Council's preferred option? If so, are there any specific areas or materials that should be protected? If not, why?**
- Q Do you consider that Areas of Constraint on Mineral Development should be included, if so to what extent should they cover the district?**

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# Key Issue 15 Proposed Transportation Schemes

**7.48** The transportation network is a critical element in supporting economic growth and social mobility. The efficient movement of goods and services play a key role in attracting inward investment while good transportation infrastructure allows people access to essential services.

## Regional Policy Context

**7.49** Under Regional Guidance RG2 the RDS seeks to deliver a balanced approach to transport infrastructure by managing the use of road and rail space and using it in a better and smarter way. Key objectives within RG2 include:

- Improving connectivity
- Maximising the potential of the Regional Strategic Transport Network
- Using road and railways more efficiently
- Managing the movement of freight
- Improving access to our cities and towns.

**7.50** The RDS illustrates the strategic road network within NI. The RDS shows that Newry, Mourne and Down has a Key Transport Corridor (A1), 2 Link Corridors (A7 Belfast-Downpatrick & A28 Armagh Road) and 2 Trunk Roads (A2 Newry to Warrenpoint & A24 Carryduff to Newcastle).



Map 8: Northern Ireland's Strategic Transportation Network

Source: RDS 2035

**7.51** One of the key aims of the SPPS is to promote sustainable active travel, reduce congestion and the reliance on the private car. Given the rural nature of the district the private car is likely to remain the predominant means of transport for the plan period.

**7.52** DfI has identified a number of strategic<sup>10</sup> and non-strategic road schemes within the Newry, Mourne and Down area. Consideration should be given to whether building non-strategic roads contribute to the aim of regional policy and which schemes should be carried forward and given protection within the LDP.

**7.53** In considering the protection of proposed road schemes and other key transportation schemes the Council will have regard to regional policy, including the RDS, Regional Transportation Strategy, the Regional Strategic Transport Network Transport Plan, Sub Regional Transport Plan, the Investment Strategy and Accessible Transport Strategy.

**7.54** Within the Regional Transportation Strategy 'Ensuring a Sustainable Transport Future: A New Approach' strategic objective 1 is to have improved connectivity within the region and strategic objective 9 is to develop transport programmes focused on the user.

**7.55** One of the regional strategic objectives for transportation and land use planning is to protect routes required for new transport schemes. The SPPS states that new transport schemes (including major proposals for road, rail and public transport provision, park and ride proposals and cycle/pedestrian networks) or planned improvements to the transport network should be identified in the LDP. The land required to facilitate such infrastructure provision needs to be afforded adequate protection from development likely to jeopardise its implementation. LDPs should assess transport needs, problems and opportunities within the Plan area and ensure that appropriate consideration is given to transportation issues in the allocation of land for future development.

**7.56** Planning Policy Statement 3: Access, Movement and Parking (PPS3) Policy AMP4 Protection for New Transport Schemes protects the implementation of a transport scheme identified in a development plan. The policy sets out the matters to be considered in assessing whether the implementation of a particular scheme would be prejudiced by a development proposal.

**7.57** Planning Policy Statement 13: Transportation and Land Use (PPS13) General Principle 8 gives protection to land required to facilitate improvements in the transport network. Any land required to facilitate their implementation should be identified and protected in the LDP. This will include protection of routes for transport infrastructure beyond the LDP period where these are of strategic importance.

## Local Context

**7.58** Within the district, the A1 linking Newry with Belfast and Dublin is the only road identified as a Key Transport Corridor within the Strategic Transportation Network (STN). Two routes within the district have been identified as 'Link Corridors' these being the A7 section linking Downpatrick to Belfast and the A28 section linking Newry with Armagh. Several 'Trunk Roads' are located within the district these being the A2 section linking Newry to Warrenpoint, the A27 linking Newry to Portadown and the A2 and A24 travelling north from Newcastle to Ballynahinch and then Belfast. The STN whilst serving a number of the Council's main settlements, is better for journeys into and out of the district than for journeys between the main settlements within the district.

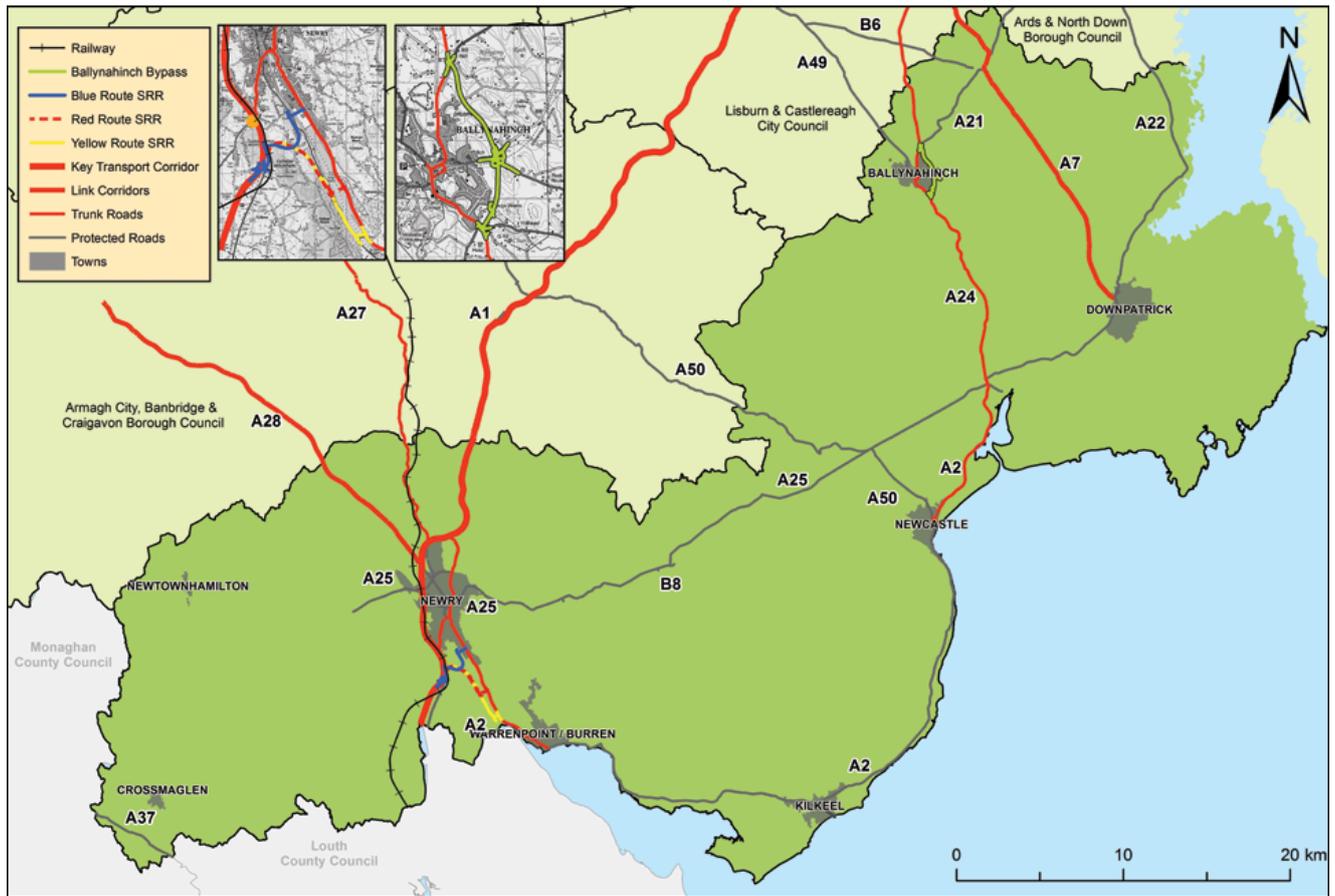
**7.59** The A1 and A2 Newry to Warrenpoint Road form the only sections of dual carriageway within the Council area. There are no motorways within the Council area. The remaining routes within the Council area are single carriage 'A' Roads, 'B' Roads or minor Roads, both Classified and Unclassified.

<sup>10</sup> Strategic road improvements relate to schemes listed on DfI Roads major works road programme.

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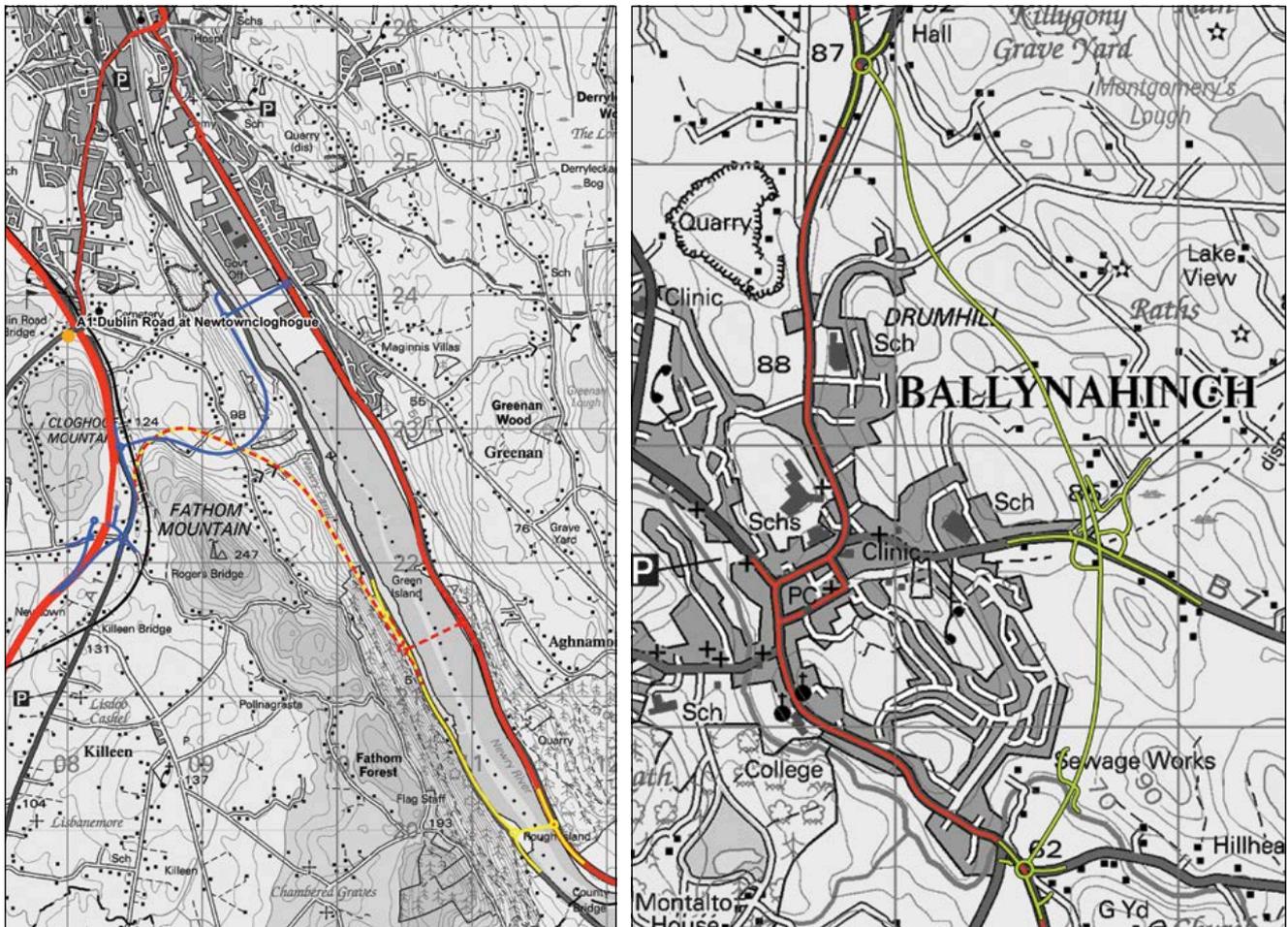
## Local Development Plan

### Key Issue 15 - Proposed Transportation Schemes



Map 9: The District's Strategic Transport Network Including Protected Routes

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**7.60** There are currently 11 protected routes designated within the district (see Map 9). Current regional policy under PPS3 seeks to restrict the formation of a new access onto these main routes. These main routes facilitate the efficient movement of traffic over long distances and comprise:

- Primary routes
- Routes between principal towns
- Routes to ports
- Selected routes with high traffic flows.

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## Local Development Plan

### Key Issue 15 - Proposed Transportation Schemes

**7.61** Where appropriate, development plans can identify and prepare local policies for those stretches of a protected route to be subjected to further access restrictions beyond those set out in Policy AMP3 of PPS3, for instance due to a history of traffic collisions, high volumes of traffic or speed of vehicles.

**7.62** There is one train station serving the district, this is located on the edge of Newry and connects the city with the main Belfast to Dublin Line. The Dublin - Belfast train service is jointly operated by Iarnród Éireann and Translink, who are currently looking at proposals to increase the frequency and journey time of this service<sup>11</sup>. Census figures show that just 0.42% of residents within the district use rail as a means of transport to their place of work or full-time education, although this may improve in the medium to long-term with improved frequency and journey times. This compares with 1.32% as an NI average. With limited rail connections and nearly 82.45% of Newry, Mourne and Down households owning a private vehicle, road travel appears set to remain the dominant mode of transportation over the plan period.

**7.63** Whilst responsibility for the delivery of transportation infrastructure is outside the remit of the Council, the Council nonetheless, as previously highlighted, has an important role to play in facilitating improvements to the transportation network.

**7.64** The ADAP Policy TRAN 1 protects identified road schemes from development that would prejudice the availability of land required. The ADAP identifies the following specific strategic transportation proposals:

- **The Strangford Road – Saul Road Link**

This includes the construction of the development road from Rathkeltair Road to Saul Road, the upgrading of the northern section of Rathkeltair Road between Strangford Road and the development road and the upgrading of the Rathkeltair Road/Strangford Road junction. The proposal is developer led and is dependent upon the structured development of zoned lands. In August 2016 the then Minister initiated a feasibility study of the scheme to assist the Department in discussions with key stakeholders on the possibility of providing this road in the future.



- **Ballynahinch By-pass/A24**

This road proposal is at an advanced stage. A public inquiry was completed in January 2016 and DfI have considered the Inspectors Report. DfI has published its notice to proceed with the scheme and make a vesting order when funding is available.

The BNMAP identifies the following non-strategic road schemes within the Newry area:

- **Rathfriland Road Link, Newry**

This proposal would link the A25 Rathfriland Road and B8 Hilltown Road with A1 Belfast Road and the Regional Strategic Transport Network. This scheme would relieve traffic from surrounding residential areas and is partially development led, necessary in the longer-term for the development of the area beyond 2015.

- **Bridge Street, Newry - Widening**

This scheme involves the widening of Dublin Street/ Bridge Street to facilitate two lanes of through traffic in each direction through this part of Newry. However, it is mentioned that this scheme will need to be either development led or as resources permit.

Strategic Road schemes not included in either of the development plans include:

- **Newry Southern Relief Road**

This scheme links the A1 with the A2 Warrenpoint Road. This scheme would reduce traffic volumes through the centre of Newry and improve access to the port of Warrenpoint. Whilst a proposed route for the road was originally included on the draft BNMAP this was excluded from the adopted version. As of 19 June 2017 DfI has completed the stage 1 assessment and three options for the development have been identified (see Map 9). It is anticipated that a preferred options report will be published in Summer 2018 and will identify the preferred route option.

- **Narrow Water Bridge**

This proposal entails the construction of a single lane bridge across the top of Carlingford Lough where it meets the Newry River. The bridge would cross at the narrowest point, at Narrow Water Castle, which is approximately a mile north west of Warrenpoint connecting the A2 Newry to Warrenpoint dual carriageway to the R173 in County Louth close to Omeath. Work is progressing to consider and analyse in more detail high level options for the Narrow Water Bridge. This work will consider each option in the context of the three key objectives for the bridge:

- To link the two communities on both sides of the lough/ border
- To encourage and enhance overall tourism in the cross border region
- To protect the natural environment on both sides of the lough/border.

- **A7 Rowallane to Dorans Rock, South of Saintfield**

The scheme seeks to widen a narrow 1460m section of this strategic road south of Saintfield, to provide 7.3m plus 0.5m edge of carriageway strips and improve the forward visibility along the stretch with provision of a 2.1m verge to the west and 2.1m footpath to the east. DfI has advised that the design work and environmental assessment for the proposal are substantially complete.

**7.65** The Community Plan's thematic group for environmental and spatial development seeks to support the prioritisation of three road schemes on an NI wide basis, these being the Newry Southern Relief Road, Ballynahinch By-pass and A7 Saintfield Road schemes. The Council will work in partnership with DfI to bring these road schemes forward. The Community Plan also seeks to reduce congestion in the district's key tourism centres. The thematic group for economic development seeks to ensure the LDP promotes economic development and regeneration across the whole district.

<sup>11</sup> Better Connecting Dublin & Belfast Enterprise Strategic Development Plan (March 2018).

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# Options for Proposed Transportation Schemes

## Option 1

**Protect land for any strategic transportation scheme identified by DfI.**

This option would provide protection for all strategic transportation schemes within the district. However, it would not provide protection for any non-strategic transportation schemes. This option would not sufficiently protect land required for non-strategic transportation schemes and would likely result in land being developed for other uses.

## Option 2

**Include non-strategic transportation schemes in the LDP which have been justified by DfI through a Local Transport Strategy for which there is a reasonable prospect of delivery.**

This option would provide protection to strategic transportation schemes and those non-strategic schemes which have a reasonable prospect of delivery. This option would release lands for other uses where non-strategic schemes are unlikely to be delivered. It would continue to protect land for non-strategic schemes which have a reasonable prospect of delivery.

## Option 3

**Protect land for all identified road schemes (strategic and non-strategic) irrespective of their status.**

This option would protect all identified transportation schemes. This option would protect land for schemes which do not have a reasonable prospect of delivery. This option may unnecessarily restrict development on lands designated for a non-strategic transportation scheme which has a limited prospect of delivery.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 1 and Option 2 received the same pattern of scoring. A degree of difference is highlighted in the analysis with Option 1 which is considered to be less favourable than Option 2 in terms of economic objectives, however more favourable in terms of environmental objectives. Option 3 is less sustainable than Options 1 and 2 as it may result in land which is unlikely to be used becoming sterilised. It may also conflict with minerals development and result in the loss of greenfield land in the long term.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it would ensure that only proposed road schemes with a realistic possibility of delivery would be taken forward in the LDP. Only schemes which can be reasonably justified by DfI would be given protection, allowing land involved in those schemes which cannot be justified to be released.



*Q* Do you agree with the Council's preferred option? If not, why?

*Q* Are there any alternative options the Council should consider?

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## Key Issue 16

# Park and Ride/Share Sites

### Regional Policy Context

**7.66** The aim of regional policy is to move towards more sustainable forms of travelling and away from use of the private car. The LDP will bring forward proposals to promote and encourage sustainable/active travel. Park and ride/share is a system for reducing urban traffic congestion in which drivers leave their cars in car parks and travel to a town/city on public transport, or alternatively by car pool, walking or cycling.

**7.67** The aim of park and ride/share sites is to relieve the road network and reduce congestion in our towns and cities. However, the identification and designation of a site for park and ride must take account of wider factors such as public transport provision, accessibility and other environmental considerations. Problems can arise where commuters park their cars in our smaller settlements in order to car pool or link with public transport into the larger centres. This can reduce the availability of parking spaces within smaller settlements which in turn can have a negative impact on the local economy. Therefore there may be a case for providing park and ride/share facilities in locations where there is an evident need identified in the Council's overall car parking strategy.

**7.68** The RDS aims to improve the efficiency of road space and railways and seeks continued investment in multi-modal facilities and park and ride sites in order to relieve the road and rail network. In considering the provision of park and ride/share schemes the Council will consider the Regional Transportation Strategy and relevant transport plans. The Sub-Regional Transport Plan 2015 states that due to the costs of operating a park and ride they are generally only viable in cities where there is heavy congestion and pressure on central parking. However, there is an emerging pattern towards park and share which may be a more viable option for locations further away from larger towns and cities.

**7.69** The SPPS advises that LDPs should recognise the role of car parking in influencing the modal choice between private car and public transport and moves towards more sustainable transport modes and a reduction in the use of the private car. The LDP should consider and identify park and ride/share sites where appropriate.

**7.70** Further planning policy for the development of park and ride/share schemes is set out in Policy AMP10 of PPS3 and PPS13. PPS13 requires park and ride/share proposals to be located within settlements limits or existing transport interchanges although it acknowledges that there may be occasions that a location may be needed in the countryside.

### Local Context

**7.71** The 2011 Census reports that approximately 76% of residents of working age in the district travel to their place of work by private vehicle which is by far the most popular method of travel. While this is to be expected given the relatively rural nature of the district, the Council will encourage and promote sustainable travel methods with the aim to reduce the reliance on the private car. Approximately 12% of residents work at home.

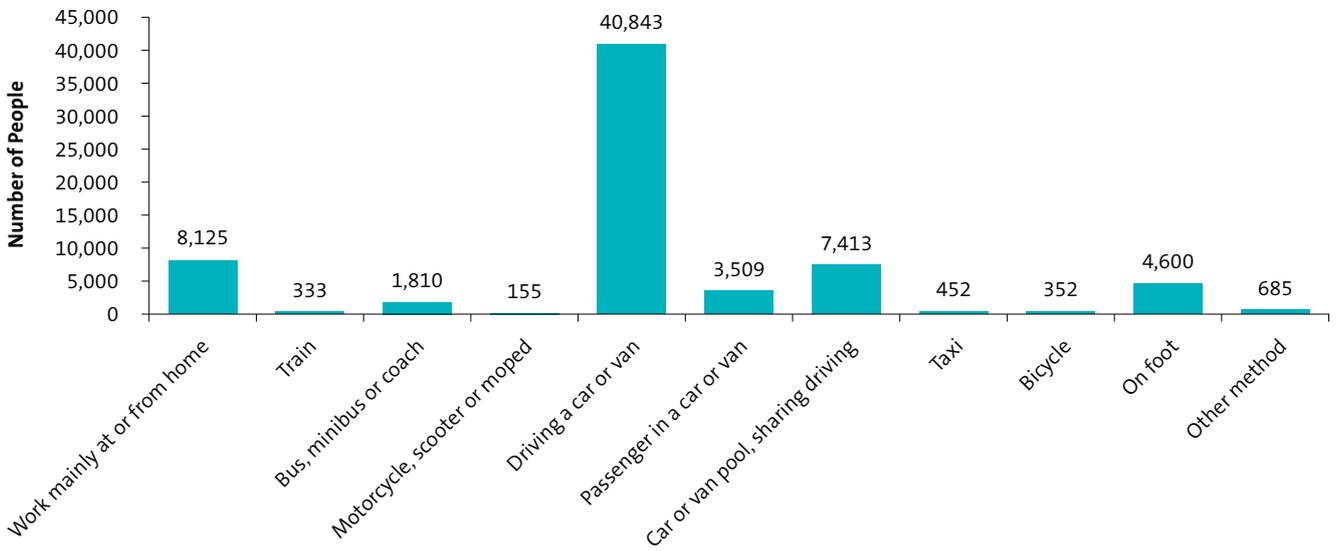
**7.72** The aim of park and ride/share is to reduce the level of traffic and congestion in urban centres by reducing the amount of private cars entering our town and city centres and creating a more sustainable travel alternative. There are currently four park and ride/share sites across the district with several other potential park and ride/share locations identified.

**7.73** Currently in the district the following park and ride/share sites are operational:

- A1 Belfast Road at Sheepbridge (63 spaces)
- A24 Newcastle Road /Clough Road roundabout (34 spaces)
- Newry Rail Station, Drumbeg Lane (334 spaces)
- A1 Dublin Road at Newtowncloghoge (25 spaces)

In addition, the parking to the rear of the bus station in Downpatrick serves as an informal park and ride facility.

Figure 12: Method of Travel to Work in the District



Source: Census 2011



Newry Train Station

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## Local Development Plan

### Key Issue 16 - Park and Ride/Share Sites

**7.74** In the provision of park and ride/share sites the current priority of DfI is to focus development on the Strategic Road Network in line with best practice. Currently all of the district's existing and proposed sites can be seen to be located on or adjacent to the Strategic Road Network.

**7.75** The Roads Service NI Downpatrick Transport Review (August 2015) also highlights options for a Downpatrick park and ride/share at Down Business Park/ Abbey Lodge or Belfast Road roundabout. DfI Roads has now identified the Belfast Road roundabout as the location for this park and ride/share site and this project is programmed for delivery in 2018-2019 subject to funding.

**7.76** The ADAP designates a park and ride/share site at Newcastle Road, Clough which has recently been extended. The ADAP also designates a park and ride/share site to the north of Ballynahinch, linked with the development of the Ballynahinch By-pass. This is to be constructed on the northern side of the proposed Saintfield Road roundabout between the A24 Belfast Road and A21 Saintfield Road. The BNMAP designates park and ride/share sites at Sheepbridge and Newtowncloghoge.

**7.77** One of the guiding principles of our Community Plan is to support a sustainable approach to development. The Community Plan identifies 'Level of Connectivity' as a key indicator and highlights the importance of the level of infrastructure and transport as a key issue. The Thematic Delivery Plan for Environment and Spatial Development seeks to explore new opportunities to enable and encourage more people to use public transport including park and ride/share schemes. It also seeks to reduce congestion in the district's key tourism centres. Park and ride/share schemes present an opportunity to reduce congestion and the use of the private car by providing a sustainable travel alternative.



Park and Share Site, Clough

# Options for Park and Ride/ Share Sites

## Option 1

**Identify and protect existing and proposed park and ride sites across the district.**

This option would provide protection to existing sites. However, it does not allow for the consideration and identification of additional sites as required by the SPPS.

## Option 2

**Identify and protect existing and proposed park and ride sites across the district and consider the potential for additional park and ride/share sites to be identified across the district.**

This option would meet the requirement of regional policy and promotes active travel through the identification of potential additional park and ride/share sites. Possible settlements that may benefit from a park and ride/share site to ease town centre parking and congestion include Warrenpoint, Castlewellan and Saintfield as well as enhancing facilities around Newry. This option also protects existing sites.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that both options received the same pattern of scoring across the 14 sustainability objectives. While Option 1 would be more favourable in terms of the environmental objectives it is less favourable than Option 2 in terms of social and economic objectives by facilitating park and ride facilities to a greater number of settlements. Overall, both options are considered to be sustainable.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it would allow for further investigation into the identification of additional park and ride/share sites. A full analysis of further potential sites would identify where there is a need and would provide a sustainable travel option in accordance with SPPS and RDS.



- Q* Do you agree with the Council's preferred option? If not, why?
- Q* Are there any locations you believe would benefit from a park and ride/share site?
- Q* How can the LDP reduce congestion and promote sustainable travel with its land use policies?
- Q* Are there any alternative options the Council should consider?

# Key Issue 17

## Sustainable/Active Travel and Identification of Greenways

### Regional Policy Context

**7.78** The key aims of the RDS are:

- To improve connectivity to enhance the movement of people, goods, energy and information between places
- To support our towns, villages and rural communities to maximise their potential for growth, including the provision of rural recreation and tourism
- To take actions to reduce our carbon footprint and facilitate adaptation to climate change.

**7.79** The Regional Transport Strategy sets out a vision “to have a modern, sustainable, safe transportation system which benefits society, the economy and the environment and which actively contributes to social inclusion and everyone’s quality of life.” This vision is still appropriate for central government’s new approach to regional transportation which will refocus and rebalance our transport priorities and present a fresh direction for transportation with sustainability at its core.

**7.80** The SPPS sets out the regional objectives for transportation and land use planning and includes promoting sustainable patterns of development which reduce the need for motorised transport; encourage active travel; promote the provision of adequate facilities for cyclists in new development and protect routes required for new transport schemes including disused transport routes with potential for future re-use.

**7.81** In accordance with the SPPS the LDP will identify active travel networks and provide a range of infrastructure improvements to increase the use of more sustainable modes. New transport schemes or planned improvements to the transportation network will be identified and afforded adequate protection for development likely to jeopardise its implementation. The LDP will identify and safeguard disused transport routes where there is a reasonable prospect of re-use for future transport purposes.

**7.82** The SPPS requires councils to take account of the importance of protecting linear open spaces such as pedestrian and cycle routes, community greenways, former railway lines and river and canal corridors, many of which are valuable in linking large areas of open space. It must also take account of the importance of promoting and protecting public access to and along the coast.

**7.83** PPS3 requires greater integration of transportation and land use planning by:

- Promoting more sustainable transport choices
- Promoting greater accessibility for all
- Reducing the need to travel, especially by the private car.

**7.84** The role of the LDP in facilitating a move to more sustainable transport modes will primarily be met through the protection of routes and sites required for new schemes and the identification of walking, cycling and public transport infrastructure required as an integral element of the development of zoned land.

**7.85** LDPs will identify and protect disused transport routes, including any associated facilities, where proposals exist for their re-use for transportation, recreation or leisure purposes.

**7.86** General Principle 8 of PPS13 states that land required to facilitate improvements in the transport network should be afforded protection and advises that any land required to facilitate the implementation should then be identified and protected in the appropriate LDP. The LDP should afford protection where a realistic opportunity exists for the re-use of a disused transport site or route for future transport purposes.

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**Local Development Plan****Key Issue 17 - Sustainable/Active Travel and Identification of Greenways**

Map 10: Northern Ireland's Strategic Greenways

Source: DfI

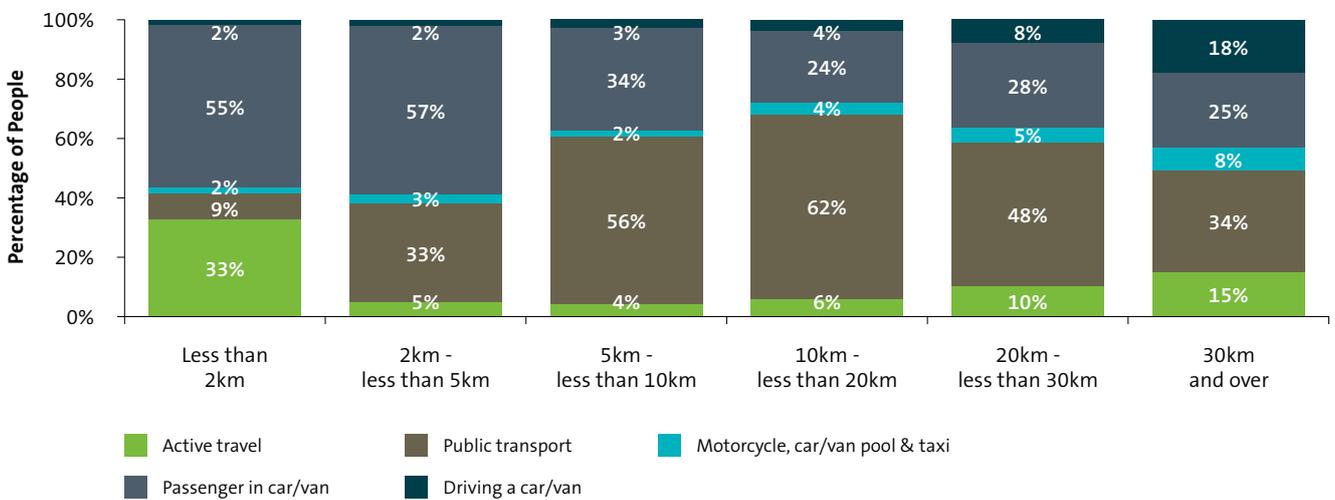
**Strategic Plan for Greenways (2016)**

**7.87** DfI published a Strategic Plan for Greenways in 2016 which identifies 1,000km of greenway routes that should be explored to develop a primary greenway network and from which a secondary greenway network could progressively extend across the region. It also highlights a third tier of community greenways which could connect local communities to their green space and neighbouring communities.

**Local Context**

**7.88** The 2011 Census reports that 13.8% of the district's working population live within 2km of their place of work, despite this only 4.6% of the working population travel to their place of work by foot or bicycle. The 2011 Census highlights that 33% of the working population who travel less than 2km to work do so by active travel (see Figure 13). There are also 17.5% of households within the district which do not have access to a car or van. Given the district's potential to make greater use of more sustainable/active means of travel the LDP will therefore seek to promote sustainable/active transport solutions to meet the travel needs of the district and to reduce the need to travel by private car.

Figure 13: The District's Method of Travel to Work by Distance Travelled to Work



Source: Department for Infrastructure

**7.89** Active travel is defined as personal travel involving some element of physical activity mainly walking or cycling. The Council will promote and encourage active travel through the LDP and will identify and protect greenways to promote sustainable travel, health and wellbeing, recreation and tourism.

**7.90** The Community Plan's Economic Development, Regeneration and Tourism Thematic Delivery Plan seeks to complete the Great Eastern Greenway for tourism. This would provide a greenway link between Newry and Omeath, connecting with Carlingford.

**7.91** The Environment and Spatial Development Thematic Delivery Plan seeks to increase promotion of the development and implementation of both green and blue infrastructure across the district.

**7.92** The Health and Wellbeing Thematic Group seeks to create a physical activity forum for co-ordinated working to help address the barriers to physical activity in the district.

**Existing Development Plans**

**7.93** The ADAP designated the following disused rail track beds which are protected under Policy AMP5 of PPS3:

- Belfast - Downpatrick
- Belfast - Ballynahinch
- Downpatrick - Ardglass
- Downpatrick - Newcastle
- Newcastle - Banbridge

**7.94** The BNMAP designated the following disused rail track beds which are protected under policy AMP5 of PPS3:

- Newry - Warrenpoint
- Newry - Omeath
- Newry - Portadown/Craigavon
- Newry - Armagh
- Newry - Bessbrook (tram line)

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## Local Development Plan

### Key Issue 17 - Sustainable/Active Travel and Identification of Greenways

#### Greenways

**7.95** There is an existing greenway between Newry and Portadown/Craigavon which mainly follows the canal towpath with an approximate distance of 32km. To the south of Newry the Carlingford Lough Greenway is currently being brought forward in phases. The Council completed phase 1 of the Carlingford Lough Greenway in 2016 (running through the Albert Basin, along Middlebank to the Newry Canal weir) with the remaining sections programmed for completion by 2019. When complete this will link with the existing Carlingford to Omeath Greenway. There is further potential to develop this greenway to Greenore, Dundalk and Dublin forming part of the Great Eastern Greenway.

**7.96** The Council is currently exploring the potential of developing five further greenways within the district. These are:

- Downpatrick - Comber, along the former Belfast and County Down Railway in conjunction with Ards and North Down Borough Council (29km).
- Downpatrick - Newcastle, along the former Belfast and County Down Railway (21km).
- Downpatrick - Ardglass, along the former Belfast and County Down Railway (13km).
- Newry - Bessbrook, along the former Newry to Bessbrook tram line (5km).
- Newry - Omeath (Carlingford Lough Greenway), linking with Carlingford (10km).





Map 11: Line of Proposed Bessbrook Greenway

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**7.97** The Council is also developing a proposal for a coastal path between Portavogie and Greencastle in conjunction with Ards and North Down Borough Council.

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# Options for Sustainable/Active Travel and Identification of Greenways

## Option 1

**Retain the existing policy approach toward sustainable transport and active travel.**

No specific policy on greenways, retain existing designation for protected railway lines in line with BNMAP and ADAP. Identify and protect new strategic greenways.

## Option 2

**As per Option 1 and in addition identify and protect community greenways.**

This option would also introduce a new policy promoting active travel (walking, cycling and integrating with public transport) in new development.

New development proposals will need to demonstrate how they support and enhance linkages to greenways. This option would address both strategic and community greenways. The LDP will seek to identify and protect community greenways which will establish linear connections between areas of open space, connect communities with services and generally enhance the environment for pedestrians and cyclists.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 2 scored significantly positive in terms of health and wellbeing, strengthening society and encouraging sustainable active travel based on its potential to encourage physical activity, increase connectivity and accessibility to shared space as well as promoting positive social interaction. Whilst Option 1 scored positive for the same objectives as Option 2, overall Option 2 has the potential to deliver more.

### Preferred Option:

## Option 2

### Justification

Option 2 is considered to best adhere to regional policy in that it actively promotes and encourages new development to link with greenways, community greenways and open spaces. This option will identify and protect linear connections between communities and open space in accordance with the SPPS and other regional policy.



- Q Do you agree with the Council's preferred option in relation to sustainable/active travel and greenways? If not, why?**
- Q Are there any alternative approaches the LDP should consider to promote/encourage active travel in the district?**
- Q Are there any pedestrian/cycle links or paths that should be brought forward to form part of the district's greenway network?**

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## Local Development Plan

### Utilities, Renewable Energy and Telecommunications

**7.98** The Council, whilst not responsible for the delivery of utilities such as telecommunications, electricity, water and waste water treatment will seek to facilitate the development of existing networks through its planning policies whilst highlighting infrastructure constraints and requirements through key site requirements on zoned and designated sites.



Map 12: SONI Transmission Network

Source: SONI



## The Northern Ireland Electricity Grid

**7.99** The Systems Operator for Northern Ireland (SONI) is responsible for managing and operating the electricity transmission grid. The transmission grid entails high voltage power lines running at 275kV or 110kV (see Map 12). These lines bring power from where it is generated (power stations, wind farms etc), to the lower voltage distribution grid (maintained and operated by NIE Networks). The distribution network entails 33kV and 11kV power lines and delivers power to households and the majority of businesses. NIE Networks are responsible for building and maintaining both the transmission and distribution grids.

### The Transmission Grid

**7.100** Map 12 shows that whilst the transmission network (110kV double circuit) extends to the hub of Newry City it only extends to Ballynahinch in the eastern part of the district. The hub of Downpatrick does not benefit from a direct connection to the transmission network. Whilst businesses with a large energy requirement can apply to SONI to connect to the transmission network, the absence of existing transmission infrastructure is likely to act as a barrier to such businesses considering establishing themselves in the district's Downpatrick hub.

**7.101** No substantial SONI projects are currently proposed within the district and SONI has advised that it considers the transmission network meets the district's current energy demands. The Council will continue to liaise with SONI to ensure that the district represents a viable option for all business particularly those with large energy consumption requirements.

### The Distribution Grid

**7.102** The Council granted planning permission for the construction of a new 33kV overhead line extending from the Downpatrick Road, Ballynahinch to the Bullydugan Road,

Downpatrick in August 2017. NIE Networks is currently progressing this project and estimate that it will be operational by winter 2019. This will ensure that there is adequate capacity across the network to meet estimated user demand in the Downpatrick area over the next 10-20 years.

**7.103** In addition to the new 33kV circuit a number of other projects have been identified by NIE Networks to address supply capacity issues across the district. These entail increasing capacity through upgrading substation infrastructure (Silverbridge/Newtownhamilton) and re-building part of the Annsborough to Newcastle 11kV line. On-going and planned investment by NIE Networks across the district over the next five years amounts to £4.5million, this represents 18% of the NIE Networks budget. Taking account of on-going and planned capacity upgrade works NIE Networks considers there will be sufficient capacity across the distribution network to supply the district's projected supply needs over the life of their current business plan period 2017-2024.

**7.104** NIE Networks is currently working on the development of capacity maps for the distribution grid across NI. These will provide an indication of headroom for increased demand and will provide a useful evidence base for the LDP once published. The issue of the capacity of the distribution network to allow for renewable energy generators to link to the grid is considered under the following renewables section.

**7.105** No options are proposed in respect of the electricity grid as the Council has no responsibility for electricity provision. The electricity grid however plays a key role in supporting the district's economic growth. The Council will liaise with both SONI and NIE Networks to ensure that proposed policies and designations within the Council's LDP will be supported by the district's grid infrastructure and the electricity network continues to be developed and enhanced to meet the district's needs.

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## Key Issue 18 Renewable Energy

### Regional Policy Context

**7.106** The aim of the SPPS in relation to renewable energy is to facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve NI's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance.

**7.107** The SPPS states that particular care should be taken when considering the potential impact of all renewable proposals on the landscape. For example, some landscapes may be able to accommodate wind farms or solar farms more easily than others, on account of their topography, landform and ability to limit visibility. It also highlights a cautious approach for renewable energy developments within designated landscapes which are of significant value, such as AONBs. It states that in such sensitive landscapes, it may be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to cultural and natural heritage assets.

**7.108** DfI's Planning Policy Division has undertaken a review<sup>12</sup> of the Renewable Energy subject policy section of the SPPS and the outcome of this review is currently pending. The Council will continue to monitor this work and will revisit its renewable energy policies as and when DfI publish any revised regional policy.

**7.109** Planning Policy Statement 18: Renewable Energy (PPS18) encourages greater use of renewable energy technologies to reduce our dependence on imported fossil fuels and bring diversity and security of supply to our energy infrastructure. Increasing focus on renewable energy supplies will help NI to achieve its targets for reducing carbon emissions and reduce environmental damage.

**7.110** Under Policy RE1 of PPS18, renewable energy development and associated buildings and infrastructure will be permitted where it does not impact upon:

- Public safety, human health, or residential amenity
- Visual amenity and landscape character
- Biodiversity, nature conservation or built heritage interests
- Local natural resources, such as air quality or water quality
- Public access to the countryside.

**7.111** The main sources of renewable energy are wind, sun (solar), moving water (hydropower), heat extracted from the air, ground water (including geothermal energy), biomass (wood, biodegradable waste and energy crops) and gas (bio and landfill).

**7.112** Electricity generated by onshore wind farms is the most established, large scale source of renewable energy in NI. Over the 12 month period from April 2015 to March 2016, 90% of all renewable electricity generated within NI was generated from wind.

### Local Context

**7.113** The Community Plan's Environmental and Spatial Thematic Delivery Plan has identified the production of energy from sustainable sources as a key priority area. The LDP is seen as a vehicle to increase renewable energy sources as well as promoting renewable energy provision. Under the Economic, Regeneration and Investment Strategy, it is stated the Council will support, where appropriate, initiatives that progress renewable energy opportunities, and efforts towards achievement of the Programme for Government Renewable Energy targets.

<sup>12</sup> A DfI 'Calls for Evidence' consultation on strategic planning policy in the SPPS for 'Renewable Energy' ran from 7th March 2016 to 6th May 2016 to help inform the scope of their review. The review is expected to be completed in 2018.

**7.114** Map 13 highlights that three wind farms<sup>13</sup> have been approved in the district between 2002 and 2017. This is in stark contrast to the rest of Northern Ireland where 126 wind farms were approved between 2002 and 2015. However, 344 individual wind turbines of varying sizes were approved across the district between 2002 and 2017.

**7.115** A proposal by the First Flight Wind Consortium (B9 Energy, Dong Energy and RES) for 120 wind turbines of the east coast of the district was brought forward in 2012 but subsequently withdrawn in December 2014 due to regulatory time constraints. Whilst this project has not progressed there remains the potential that an off shore wind farm project could be developed off the County Down coast. This would require

an extension of the Transmission Grid by SONI to facilitate connection of this generator to the grid. The LDP will continue to monitor proposals and address any associated land use implications as required.

**7.116** The district contains three AONBs which cover 55.7% of the area. The cumulative impact of wind energy developments, particularly within designated and sensitive landscapes such as AONBs, may be seen as having a negative visual impact on the environmental quality and amenity of those areas. Considering how best to support renewable energy whilst protecting the districts locally and regionally important landscapes is a key challenge for the LDP.

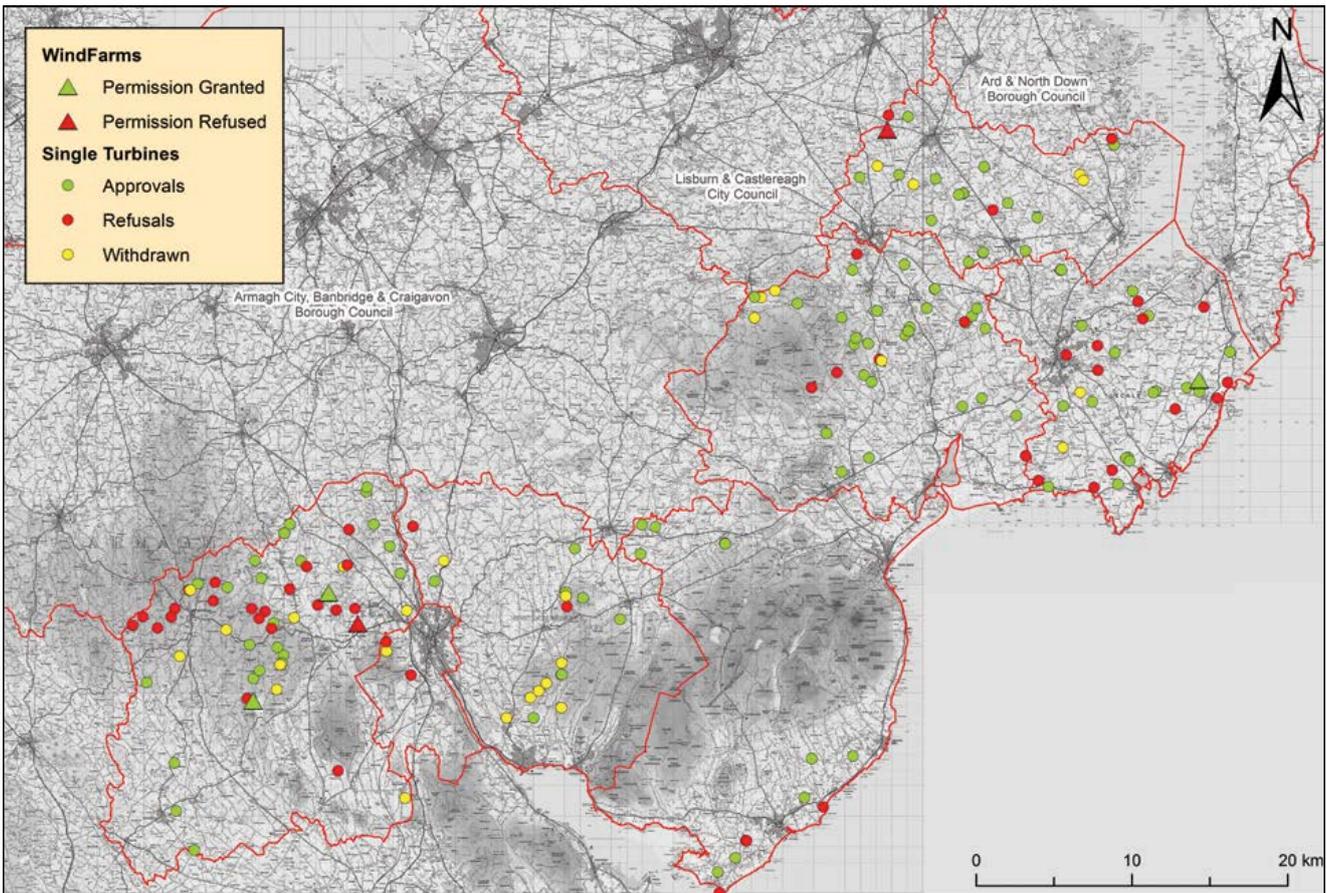
<sup>13</sup> Defined as development comprising two or more turbines



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## Local Development Plan

### Key Issue 18 - Renewable Energy

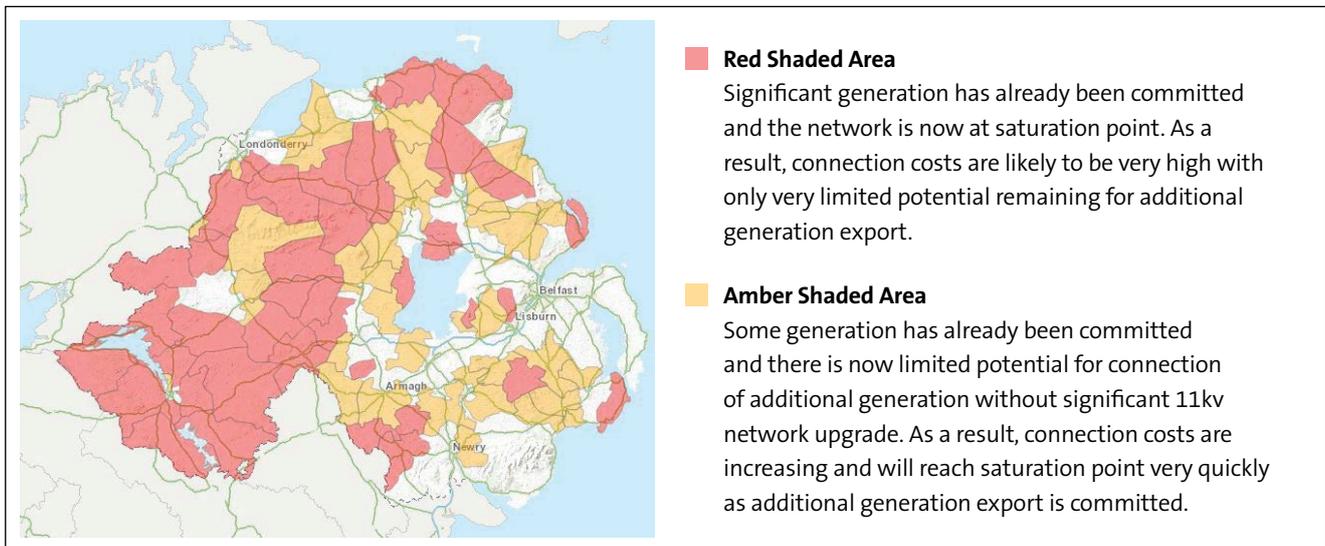


Map 13: Wind Turbine Application Decisions across the District between 2002 and 2017

Source: DfI Statistics  
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**7.117** Since the introduction of increased Renewable Obligation Certificate (ROC) incentives for small scale generation in April 2010, there has been a large increase in the amount of small scale generation either connected to, or committed to connect to the 11kV network. NIE Networks has produced an 11kV network heat map (February 2015) to provide guidance on the

capability of the 11kV network to accept further small scale generation (see Map 14 below). This heat map identifies where investment is currently required. This map is a simple visual representation, however, it highlights that locations such as Lecale, Slieve Croob and Newtownhamilton are already at saturation point.



Map 14: 11kV Heat Map for Northern Ireland

Source: NIE Networks  
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**7.118** The Department for the Economy renewable energy statistics show that for a rolling 12 month period ending March 2017, an average of 27.1% of total electricity consumption in NI was generated from renewable sources located in NI<sup>14</sup>. However, this masks the true extent of renewable generation as in February 2017 38.9% of total electricity consumption in NI was generated from renewable sources.

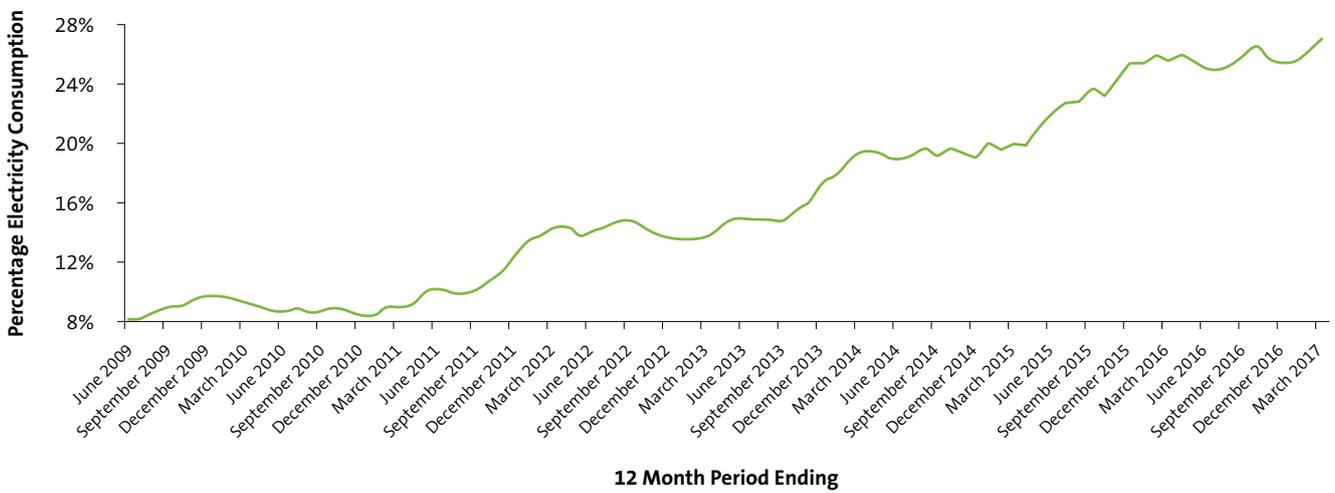
<sup>14</sup> NISRA Electricity Consumption and Renewable Generation in Northern Ireland: Year Ending March 2017

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## Local Development Plan

### Key Issue 18 - Renewable Energy

Figure 14: Rolling 12 Month Average Percentage Electricity Consumption Generated from Indigenous Renewable Sources



Source: NISRA

**7.119** NIE Networks has indicated that the NI Strategic Energy Framework target of 40% of electricity consumption from renewables by 2020 is now being met and in the absence of the Northern Ireland Executive no new or revised policy has been brought forward. As such there is no system-wide need for further renewable generation being connected to the grid. Under these circumstances NIE Networks consider that there is uncertainty over whether the Utility Regulator would approve any projects to upgrade capacity to facilitate a renewable energy generator to connect to the network. Therefore costs to connect to the grid currently fall to the electricity generator.

**7.120** Whilst there is currently uncertainty over the future renewable energy targets and subsequent need for any additional generating capacity, the Council must nonetheless consider what planning policies it wants to bring forward in respect of renewable energy development.

# Options for Renewable Energy

## Option 1

**This option would adopt the current policy based approach as set out in PPS18 and the SPPS subject policy for renewable energy projects.**

This option provides the same level of development opportunity as currently provided and is in keeping with the SPPS. Following the outcome of the SPPS review into renewable energy the Council would consider the need for any revision to its renewable energy policies.

## Option 2

**As per Option 1 but in addition identify Areas of Constraint for certain types of renewable energy (wind turbines).**

This option would introduce an additional layer of protection for the environment but conversely represents an additional restriction on the development of renewable energy across the district. Currently the district is not subject to significant development pressure from renewable energy projects. The introduction of Areas of Constraint under this policy could therefore further restrict development of renewables when there is currently no evidence to suggest they are required.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 1 would have a significant positive effect on the material assets objective and also supports the climate change objective through its potential to reduce greenhouse gas emissions and increase renewables use.

Option 2 would reduce the scale of the positive effect on sustainable economic growth as the Areas of Constraint could restrict this type of development across a considerable proportion of the district. This option has a minor positive effect on protection of sites designated for nature conservation/biodiversity. Overall it is considered that although Option 2 brings greater certainty to the protection of landscape and natural resources in the district, its restrictiveness would discourage investment in the district and may mean that opportunities are lost.

Option 1 can provide protection to the environmental objectives while enabling appropriate types and scales of renewables development in the district and consequently it is considered to be the more sustainable option overall.

### Preferred Option:

## Option 1

### Justification

Option 1 would adopt the current policy based approach as set out PPS18 and the SPPS subject policy for renewable energy projects. This option provides the same level of development opportunity as currently provided and is in keeping with the SPPS. This option ensures the continued protection of the environment through the carrying forward of policies within PPS18 whilst avoiding a blanket restriction on renewable energy projects by not introducing any Areas of Constraint. Following the outcome of the SPPS review into renewable energy the Council would consider the need for any revision to its renewable energy policies.



- Q Do you agree with the Council's preferred option to carry forward existing planning policy for renewables as contained in PPS18? If not, why?**
- Q Do you consider that the Council should identify an area(s) where renewable energy proposals would be acceptable in principle? If so, what evidence is there to support the identification of these areas i.e. wind speeds (in the case of wind turbines), suitable grid connection, distance from residential areas, other suitable infrastructure?**
- Q Do you consider Areas of Constraint for wind turbines should be introduced? If so, why and where do you think they should be located?**

# Key Issue 19

## Telecommunications

**7.121** Modern telecommunications are an essential and beneficial element of everyday living for the people of and visitors to this district. It is important to continue to support investment in high quality communications infrastructure which plays a vital role in our social and economic wellbeing.

### Regional Policy Context

**7.122** Whilst the development of high quality telecommunications infrastructure is essential for continued economic growth it is necessary to balance this against the impact on the environment as set out in the SPPS and Planning Policy Statement 10: Telecommunications (PPS10). The SPPS states that the LDP should bring forward policies which set out the detailed criteria for consideration of new telecommunications development in the local area including siting, design and impact upon visual amenity. To inform plan preparation, the Council may consult with telecommunications operators and other relevant stakeholders, in relation to the anticipated extent of the network coverage required over the plan period. In certain circumstances and subject to technical limitations on location and siting, the LDP may allocate specific sites for major new telecommunications development.

**7.123** The Council should take account of the potential effects of new telecommunications development and any necessary enabling works, on visual amenity and environmentally sensitive features and locations. New masts should only be considered where mast sharing is not feasible or offers an improved environmental solution. Operators will be encouraged to site share wherever possible.

### Local Context

**7.124** Within the Community Plan it is acknowledged that the district experiences a problem with internal connectivity in terms of communications infrastructure (both broadband and mobile). Some areas, particularly in the rural area suffer from a lack of telecommunication coverage. These are referred to as 'Not Spots' as no operator can provide a signal. Strategic Priority 4 within the Council's Economic, Regeneration and Investment Strategy seeks to improve infrastructure across the rural area. The visual impact of communications masts within rural areas is also a concern for many, particularly given the scenic nature of much of the district's landscape. The Council is aware of the need to strike a balanced approach in terms of this type of development. Also, in seeking to build stronger, safer and healthier communities through improving health and wellbeing, good communications has a role to play in reducing social isolation.

**7.125** Ofcom's Connected Nations Report<sup>15</sup> published in December 2017 represents the most up-to-date evidence base on telecommunications provision across the UK. It outlines the main developments in coverage and performance of both fixed broadband and mobile networks across the UK and its nations and provides data on current network coverage across NI in 2017. Whilst the decision to provide mobile coverage in a particular area is a commercial judgement by the mobile operators, NI nonetheless continues to see steady improvements in coverage. Ofcom's report highlights that the 2016-2017 year saw 4G indoor coverage for all four mobile network providers increase by 10% to 44%.

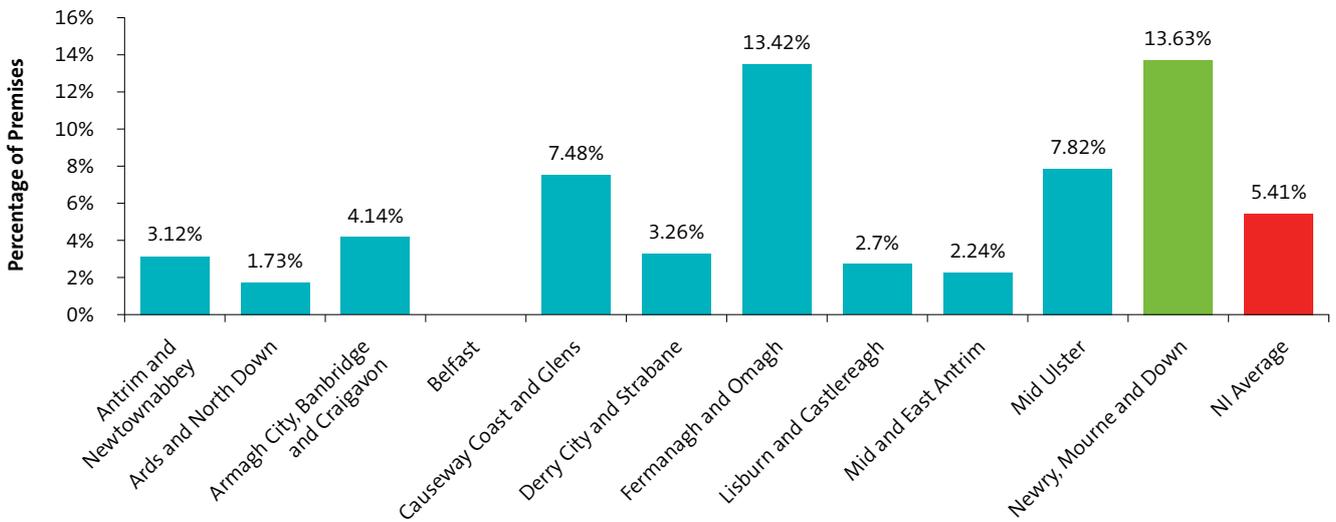
**7.126** Ofcom's report highlights that in 2017 the district had the poorest indoor 4G data and 4G voice provision of all 11 local authorities with 13.63% and 7% of premises respectively unable to get a reliable signal (see Figures 14 and 15 below). In bringing forward planning policies for telecommunications the Council is therefore mindful of the need to support the provision of telecommunications providers in filling gaps in mobile coverage across the district.

<sup>15</sup> See <https://www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-2017>

**Economic:**

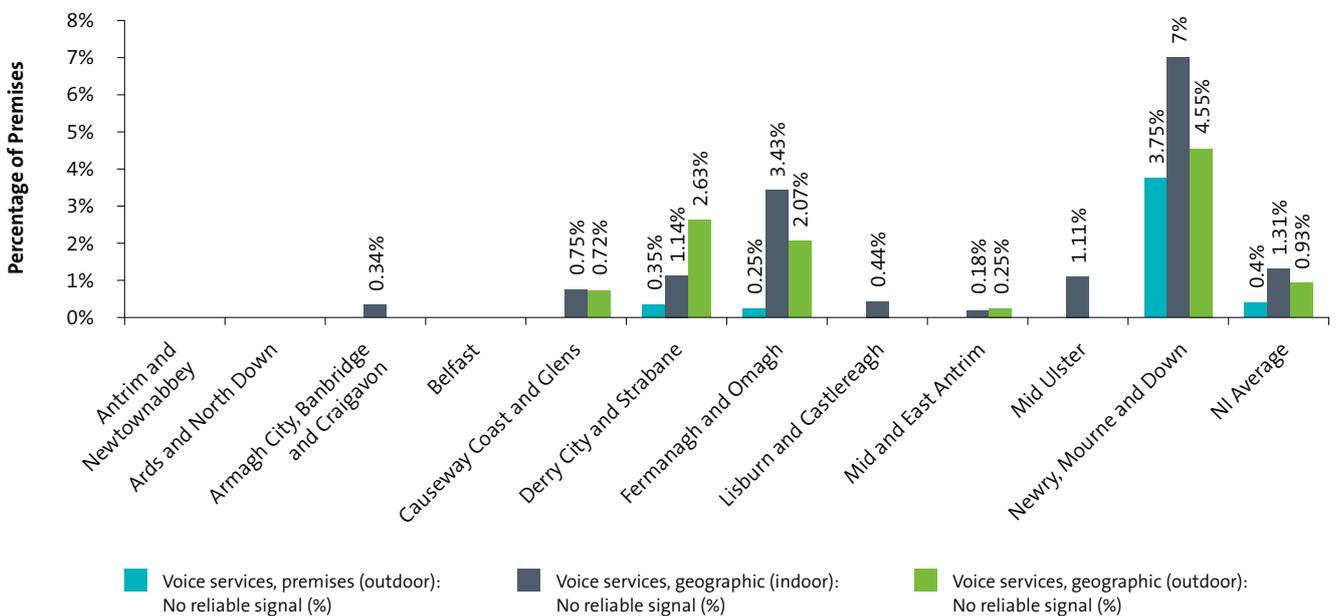
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Figure 15: Percentage of Premises with No Reliable 4G Data Service



Source: Ofcom

Figure 16: Percentage of Premises with no Reliable 4G Voice Service



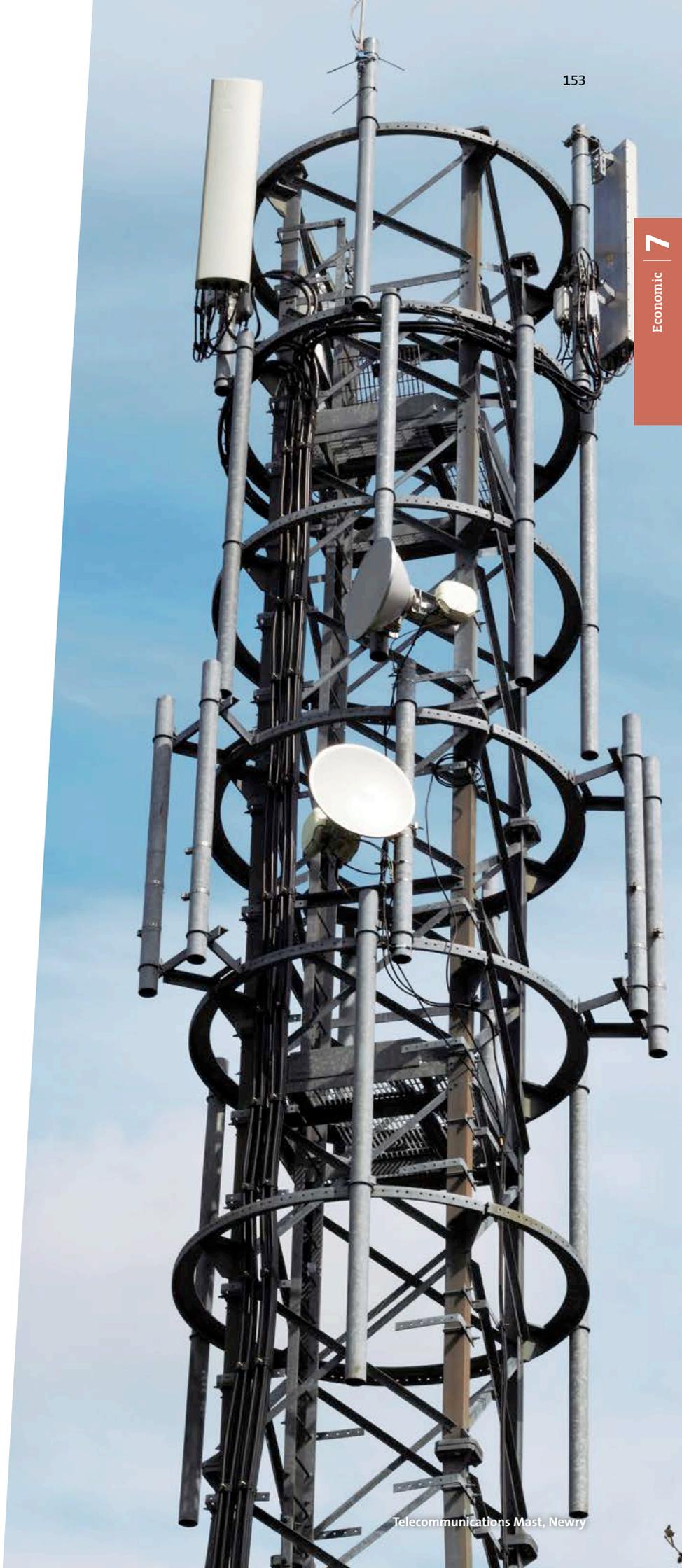
Source: Ofcom

**7.127** In terms of fixed broadband, the distance between premises and the nearest fibre enabled cabinet or exchange is the key factor in determining the speed of connection to a premises. Those living in rural areas are more likely to live further from the nearest fibre enabled cabinet and therefore have lower broadband speeds. Ofcom's Connected Nations report also indicates that 56,000 homes and offices, or 7% of properties in NI cannot access broadband speeds of 10 Mbit/s<sup>16</sup>. In Newry, Mourne and Down 7,900 premises do not have access to a service delivering 10 Mbit/s.

**7.128** Mobile broadband provides one possible means to improve broadband coverage and speeds across our district. However, again this is reliant on the network of telecommunications masts. The LDP in considering and bringing forward a policy for telecommunications for the district will seek to ensure that development of the telecommunications mast network is facilitated through the planning system.

**7.129** Moving forward, it is therefore for the Council to decide if we wish to adopt policies for telecommunications development which are in line with existing policy or if we want to develop a more restrictive policy.

<sup>16</sup> Ofcom currently defines this as broadband offering a download speed of 10Mbit/s with an upload speed of at least 1 Mbit/s.



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# Options for Telecommunications

## Option 1

**Adopt current policy as contained within PPS10.**

This option would adopt the current policy based approach as set out in PPS10 and the SPPS subject policy for telecommunications. This option provides the same level of development opportunity as currently provided and is in keeping with the SPPS. No additional designations such as areas of constraint on telecommunications are proposed.



## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 1 scores positively for the social sustainability objectives of improving health and wellbeing and strengthening society but has no perceptible effect on the housing objective. In terms of economic sustainability, this option has minor positive effects on enabling access to high quality education and significant positive effects on sustainable economic growth and material assets.

The application of criteria such as mast-sharing and consideration of landscape character, along with policy directing towards mitigation such as sympathetic design and colour in sensitive areas means that negative effects to landscape and built and cultural heritage objectives are unlikely.

### Preferred Option:

## Option 1

### Justification

The adoption of current policy in its present form is the Council's preferred option. Given the current gaps in existing mobile signal coverage, the need to support the delivery of broadband in our rural areas together with the level of protection already afforded to the environment through PPS10 Policy TEL1, the Council's preferred approach is to adopt policies which are in line with existing planning policy. No additional designations such as Areas of Constraint on telecommunications are proposed.



**Q** Do you agree with the Council's preferred option to adopt current policy as set out in PPS10 and the SPPS? If not, do you consider there is a need for a more restrictive planning policy and/or Area of Constraint for telecommunications equipment?



Non-listed vernacular building

## 8. Environmental: Protecting and Enhancing the Environment

**8.1** The fourth LDP theme, as set out in Chapter 4, focuses on our environment and contains the following associated objectives:

- To protect and enhance the natural and built environment to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and wellbeing
- To protect our built heritage assets and promote their sensitive re-use
- To conserve our Conservation Areas and Areas of Townscape Character
- To protect our sensitive upland landscapes from inappropriate development
- To reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding or coastal erosion.

**8.2** These objectives along with the regional and local policy context detailed below, which relate to the historic and scenic landscapes, have helped to inform the issues set out in this chapter.

**8.3** Within our Corporate and Community Plans, one of the strategic objectives is to make the district one of the premier tourist destinations on the island of Ireland. It is therefore imperative that we ensure the safeguarding of our tourism assets which includes the district's built and natural heritage assets as they will play an important part in this delivery mechanism.

**8.4** These environments form an integral role in adding value to the district with regards to the contributions they make towards our society in terms of the cultural, social, economic and environmental benefits associated with them. Our historic environment represents an invaluable record which allows us to understand and appreciate both the present and past while our attractive and substantial coastline must be managed appropriately to safeguard its unique character and amenity value.

**8.5** At many levels development can potentially have an adverse impact on our environment which can also lead to problems associated with flooding and coastal erosion. It is therefore important that all those involved in the planning process strive towards ensuring that potential environmental impacts are identified at the earliest stage to allow negative effects to be considered, avoided or mitigated for. This will allow change and development to be managed in a sustainable and positive way while protecting our environment.

### Regional Policy Context

**8.6** Within the RDS, Regional Guidance RG11 addresses the conservation, protection and where possible the enhancement of our built heritage and natural environment. The RDS acknowledges that the environment is one of NI's most important assets while also acknowledging the associated benefits it has to the community in terms of improving health and wellbeing, promoting economic development and addressing social problems. The RDS also acknowledges the issues surrounding the protection of our coastline along with the need for its protection against coastal squeeze and safeguarding against the loss of distinctive habitats. The document also recognises the importance of adapting to climate change and associated problems including flood risk management which is discussed within this chapter.

**8.7** The SPPS recognises the importance of the historic environment in terms of it being a natural resource which must be managed in a sustainable manner in accordance with the government's commitment to preserving and improving the built and natural environment alongside striving to halt the loss of biodiversity. The SPPS also aims to protect the undeveloped coast from inappropriate development, consistent with the RDS; and to support the sensitive enhancement and regeneration of the developed coast largely within coastal settlements. It states that development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability.

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**Environmental:**

Protecting and Enhancing the Environment

## Local Development Plan

### Environmental: Protecting and Enhancing the Environment

#### Local Policy Context

**8.8** Within the Council's Corporate Plan the protection of our natural environment in a sustainable manner is detailed as one of the Council's strategic objectives which will aid the growth of our economy and the development of the district's tourist potential. The conservation and protection of our heritage assets also supports the Community Plan themes of promoting good health and wellbeing and benefiting from a clean, quality and sustainable environment. Identifying and working towards these objectives will also assist in the delivery of other social and economic objectives including those associated with the promotion of economic growth through tourism.

#### Evidence base

**8.9** Statistics and data relating to the associated topics have been gathered and analysed from a number of sources including government agencies and internal departments within the Council. For further details relating to the evidence base please refer to the following LDP Position Papers; Paper 6 (Environmental Assets), Paper 8 (The Coast), Paper 9 (Public Utilities) and Paper 12 (Landscape Character Assessment).

#### Identification of Key Issues

**8.10** In order to ensure that the LDP brings forward an appropriate strategic framework, the remainder of this section sets out key issues that have emerged from consideration of the evidence base, consultee engagement and the Council's aims and objectives. These issues relate to the various elements that help to protect our historic environment, scenic landscapes and safeguard the unique character and amenity of our coastline. The associated options consider the possibility of implementing new or alternative policies alongside consideration of amendments to other current policies for the five key issues detailed in this chapter which may be adopted through the LDP.

## Key Issue 20

# Conservation Areas and Areas of Townscape Character

**8.11** Each of our settlements has its own unique character which plays an integral part in the district's sense of place and distinctiveness as well as playing a pivotal role in promoting economic prosperity. Some settlements contain areas that are of such architectural or historic interest that they have been designated as Conservation Areas (CAs). This designation requires development proposals to preserve or enhance the character or appearance of the area. There are many other areas within our settlements that do not have the distinctive character to warrant CA designation. However, because of their own unique identity they have been designated as Areas of Townscape Character (ATCs). Within these areas development proposals are required to maintain or enhance the character of the area.

### Regional Policy Context

**8.12** The importance of conserving, protecting and where possible enhancing the built environment is recognised within the regional guidance contained within the RDS. It identifies the natural and built environment as one of NI's most important assets. It recognises that NI has a rich and diverse built heritage which contributes to our sense of place and history. It notes it is a key marketing, tourism and recreational asset that, if managed sustainably, can make a valuable contribution to the environment, economy and society.

**8.13** The archaeology and built heritage objectives of the SPPS are to secure the protection, conservation and where possible, the enhancement of our built and archaeological heritage. It also seeks to promote sustainable development with regard to our built heritage assets and drive economic and community benefits through conservation that facilitates productive use of these assets and opportunities for investment while safeguarding historic or architectural integrity.

**8.14** The SPPS states that LDPs should identify existing CAs within the plan area and may include local policies or proposals for their protection and/or enhancement. It also highlights that the Council has the power to propose new CAs and alter existing designations where appropriate. It also acknowledges that it may be appropriate to identify and define ATCs and Areas of Village Character (AVCs). The LDP should include local policies or proposals and guidance for any such designations.

**8.15** Planning Policy Statement 6: Planning, Archaeology and the Built Environment (PPS6) sets out the regional policy requirements for CAs and ATCs and the processes associated with development plans. It states that development plans will identify all existing conservation areas and may include local policies or proposals for their protection and enhancement while also having the remit to propose new CAs or alter existing designations. With regards to ATCs and AVCs it notes development plans have the authority to identify those areas considered to have a unique identity which is often based on their historic built form or layout. Additional policy is also contained within the addendum to PPS6 in respect of ATCs which outlines the importance of development proposals respecting the appearance and qualities of each townscape area and maintaining or enhancing their distinctive character.

**Environmental:**

Protecting and Enhancing the Environment

**Local Development Plan****Key Issue 20 - Conservation Areas and Areas of Townscape Character****Local Context**

**8.16** The district has a strong built heritage which plays an important role in the overall appearance, character and sense of place of the area. The wealth of built heritage assets in the district is in part demonstrated by the number of CA designations it currently has. The two extant development plans identify the 10 existing CAs (3 in the BNMAP and 7 in the ADAP) meaning the district is ranked only second after Belfast in terms of the number of designations. Table 9 shows details of those settlements that contain a CA and the date on which it was designated or amended. It clearly demonstrates that all of the current CAs were designated sometime ago. This raises the issue of whether the existing designations continue to retain the character and appearance that justified their initial designation.

**8.17** These areas have continued to be developed in the intervening years since their designation. While the majority of development in CAs requires express planning permission to be granted there is concern that a culmination of even small scale developments could have negatively impacted or eroded their character and appearance of these designations. It may, therefore, be appropriate to review the existing CA designations to ensure they are fit-for-purpose and whether any changes are necessary.

**8.18** The current development plans also identify the existing 27 ATCs designated within the district with 23 in the BNMAP and 4 in the ADAP. These areas were designated by the area plans and therefore are much more recent than the CA designations. As a result less time has passed which has perhaps reduced the level of development that may have occurred and potentially impacted on the unique identity of these areas. Perhaps more relevantly the BNMAP, in designating the ATCs in Warrenpoint (1), Bessbrook (2) and Rostrevor (1) noted that the architectural and historic character is such that the area (or part thereof in the case of Warrenpoint) is such that it would merit CA status.

Table 9: The District's Conservation Areas

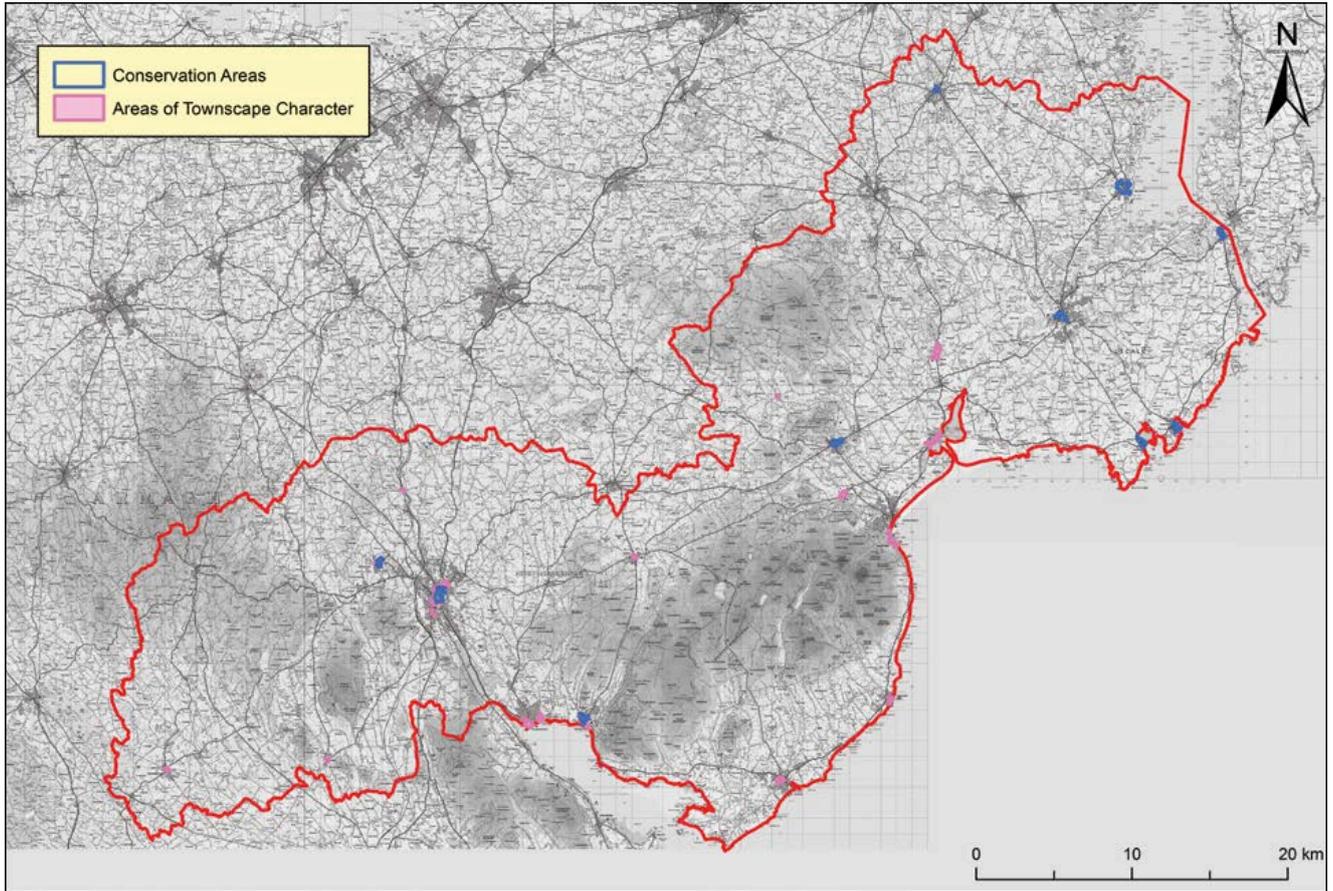
Conservation Areas	Date Designated
Ardglass	June 1996
Bessbrook	October 1983
Castlewellan	December 1992
Downpatrick	March 1985
Killough	March 1981
Killyleagh	March 1993
Newry	May 1983 (Extended 1992 & 2001)
Rostrevor	February 1979
Saintfield	February 1997
Strangford	September 1995

**8.19** With this in mind it would perhaps be prudent to carry out a review of the district's ATCs (or perhaps the four aforementioned) designations to ensure they are appropriate and consider if they should be amended, removed or whether they would warrant re-grading.

**8.20** There are no AVCs designated in the district. The existing ATC designations are located in settlements of all sizes including villages and small settlements.

**8.21** Map 15 shows the geographical location of each of the CA and ATC designations across the district. The details of each of these designations are specified within the relevant development plan and specific townscape and design advice can be found in the relevant conservation area design guide.

**8.22** The Community Plan refers to the significant number of built heritage assets contained within the district. This would include CAs and ATCs. These designations contribute to the districts distinctive landscape and sense of place which makes it an attractive place to live. It also plays an important role as an economic driver for the district with regard to its key role within the tourism industry.



Map 15: Locations of Conservation Areas and Areas of Townscape Character across the District

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**Environmental:**

Protecting and Enhancing the Environment

# Options for Conservation Area and Areas of Townscape Character

## Option 1

**Maintain the status quo - Identify and carry forward existing Conservation Areas and Areas of Townscape Character in their current form.**

This option would see no change to the existing designations or their associated policies.

## Option 2

**Review existing Conservation Area and Area of Townscape Character designations to consider whether they should be extended, reduced, removed or re-graded.**

This option offers the opportunity to consider each area on its current merits taking into account any changes in the character and appearance of the area since its initial designation. It will assess whether it may be necessary to remove or amend the existing designation to ensure all designations are appropriate.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that both options scored the same across all the objectives with positive scores being recorded for strengthening society, economic growth and landscape character and significantly positive on built and cultural heritage. However, Option 2 was noted as being slightly more positive in terms of landscape and economic growth.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it will allow for a review of all CA and ATC designations within the district to ensure they are appropriate. This will identify if there is a need to remove or re-grade existing designations or amend existing boundaries to ensure the integrity of these designations is not lost while also ensuring that the overall character is maintained or enhanced where appropriate.



- Q Do you agree with the Council's preferred approach? If not, why?
- Q Do you think that certain permitted development rights within these designations should be removed to enable the Council to ensure that even small scale developments do not negatively impact on these designations? If not, why?
- Q Do you think it is appropriate to consider additional areas within the district for CA or ATC designation? If so, where and why?

**Environmental:**

## Protecting and Enhancing the Environment

## Key Issue 21

# Non-Designated Heritage Assets

**8.23** The historic environment includes many historic and vernacular buildings which are important sources of information about our past and are often significant landmarks in the present townscape and countryside. It is considered that these buildings make a positive contribution to the local character of the district by displaying local traditions of architecture and design. They are an essential part of the district's landscape, unique heritage and identity and are therefore worthy of a level of protection.

**8.24** Within the district there is growing concern about the continuing loss of our non-listed traditional buildings, the majority of which are located within the rural area.

### Regional Policy Context

**8.25** The importance of conserving and protecting the historic environment is detailed within the regional guidance outlined within the RDS by recognising that the historic environment embraces many sites of local and international interest which once lost cannot be fully replaced. The district's rich and diverse built heritage has the ability to act as a key tourism and recreational asset and therefore the sustainable management of this can make a valuable contribution to the environment, economy and society. The RDS also recognises that if these assets are managed and protected they can make a positive contribution to regeneration. This will allow the maintenance of craft skills and the development of a sense of place that can be respected by future development.

**8.26** The SPPS also recognises the contribution our heritage makes to wider society. It notes the conservation, promotion and enhancement of these environments is key to ensuring their sustainable upkeep.

**8.27** Strategic policy within the SPPS states that the effect of a planning application on the significance of a non-designated heritage asset such as a non-listed vernacular building or historic building of local importance should be taken into account in determining the planning application. In determining applications that may impact directly or indirectly on non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The SPPS also states that councils may wish to bring forward bespoke local policies for such buildings based upon a clear evidence base.

**8.28** PPS6 and PPS21 set out the regional policy requirements for the Conversion and Re-use of Existing Buildings.

**8.29** Within PPS6 Policy BH15 refers to the re-use of non-listed vernacular buildings which aims to permit the sympathetic conversion or renovation of non-listed buildings to appropriate uses where this would secure their upkeep and retention.

**8.30** Policy CTY3 of PPS21 also contains policy associated with non-designated vernacular dwellings. It encourages the adaptation rather than replacement of dwellings that make an important contribution to the locality and will only permit their replacement where it has been demonstrated they are not reasonably capable of being made structurally sound or otherwise improved. It further notes that in the case of a dwelling that does not make an important contribution to the locality permission will be granted for a new dwelling. However, in such cases the retention of the existing structure will be accepted where it is sympathetically incorporated into the layout of the overall development scheme.

## Local Context

**8.31** There are approximately 1,438 listed buildings within the district which are afforded protection. In addition, the district contains a range of non-listed buildings and sites which reflect local architecture and design while playing an important role in the landscape, heritage and identity of the area.

**8.32** There is growing concern about the continuing loss of non-listed vernacular buildings and their features of special architectural and historic merit within our urban centres and open countryside. Current regional policy recognises the importance of our heritage and the need to conserve, protect and enhance it to ensure its upkeep. However, these assets continue to be lost.



Examples of non-listed vernacular buildings

**Environmental:**

Protecting and Enhancing the Environment

**Local Development Plan****Key Issue 21 - Non-Designated Heritage Assets**

**8.33** At present these assets are only identified through the planning process with the submission of a planning application seeking permission for development unless they are identified for formal listing. There is no formal process for the identification of these assets. As a result the number of these buildings in our landscape is not currently known.

**8.34** The introduction of a list of local heritage assets could play an important role in protecting many buildings which may be at risk of being demolished or falling into disrepair by reinforcing the importance of their contribution to the local area. The development of this list would enable the significance of any building (in its own right and as a contributor to the Council's wider strategic planning objectives), to be taken into account in the assessment of planning applications.

**8.35** A local list and the development of a selection criterion could encourage a more consistent approach to the identification and management of local heritage assets across the district. The development of such a list would also provide a consistent and accountable way of identifying local heritage assets, to the benefit of owners and developers who need to understand local development opportunities and constraints, while also promoting an increased awareness of the district's culture and heritage.

**8.36** While the use of a local heritage list may have the potential to further protect and enhance the local character and distinctiveness of the district's historic environment there are also associated risks. These include the removal of the distinct features that make the buildings worthy of protection or the threat of complete demolition by bringing the importance of these buildings to the forefront of planning policy.

**8.37** The ADAP and BNMAP aim to identify, define, designate and safeguard, as appropriate, areas of conservation, archaeological, scientific, landscape or amenity importance within both the natural and built heritage of the plan area. Neither of the two plans address the issue of non-designated heritage assets.

**8.38** The Community Plan states that while it is accepted that social and economic development are key to supporting the wellbeing of our communities it also references the fact that we must ensure that our unique natural and built heritage is enhanced and sustainably managed.

# Options for Non-Designated Heritage Assets

## Option 1

**Carry forward existing policy and consider scope to strengthen existing policy to afford further protection to non-designated heritage assets.**

This option would see non-designated heritage assets continue to be assessed on a case-by-case basis in line with the SPPS and any other carried forward policies. Many of these policies aim to ensure the retention and re-use of these assets. It would also consider if there is scope to strengthen existing policy to ensure further protection of these assets.

## Option 2

**Develop a criteria based approach for identifying non-designated heritage assets within the district. This would then be used to create a local heritage list.**

Option 2 would recognise and identify the architectural and heritage assets within the district which are deemed worthy of additional protection and are invaluable to the historic environment while bringing consistency across the district. In order for the LDP team to consider this option there would be a need to carry out an audit and ensure a comprehensive list is compiled. It is also considered there is potential that bringing forward the issue of a local list could have a negative effect by causing the loss of the very features and/or structures it would aim to protect as developers may view it as stifling development opportunities.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 1 scored significantly positive for historic environment including its ability to conserve cultural heritage and 'sense of place'. Option 2 also had positive effects for this objective, but the score was considered minor positive reflecting the positive effects but also the potential risks with this approach. Both options scored minor positive for landscape character and sustainable housing. Option 1 was more favourable in terms of economic growth while Option 2 scored uncertain due to lack of certainty around the retention of identified assets and limited knowledge around existing assets adding to uncertainty in terms of potential outcomes. Overall Option 1 scored slightly more positive than Option 2.

### Preferred Option:

## Option 1

### Justification

Option 1 is considered to offer the most comprehensive approach which would continue to inform a proactive strategy for the conservation, protection and enhancement of the local historic environment. Option 1 also allows for a review of existing policy to assess whether any amendments can be made to current policy to give further protection to the non-designated assets.



- Q Do you agree with the Council's preferred option? If so, how do you consider existing policy should be supplemented to ensure protection of non-designated heritage assets?
- Q Should the Council prepare a list of non-designated heritage assets for our district? If so, are there any non-designated heritage assets that should be considered for local listing, and why?

## Key Issue 22

# Sensitive Upland Landscapes

**8.39** The district has a diverse landscape consisting of a unique combination of mountains, forests, coast and waterways. It is one of the district's key assets and as such it should be carefully managed and protected. Undoubtedly the district's uplands (The High Mournes, Slieve Croob and the Ring of Gullion) are one of its most well-known and exceptional landscape features. As a result, they are also considered to be sensitive to development and have been afforded protection by the BNMAP. However, there is an issue regarding the level of protection afforded to these upland areas of our district.

### Regional Policy Context

**8.40** The RDS recognises NI's environment as one of its most important assets. Policy RG11 seeks to conserve, protect and where possible, enhance both built heritage and the natural environment. It seeks to achieve this by:

- Recognising and promoting the conservation of local identity and distinctive landscape character
- Conserving, protecting and where possible enhancing, designated areas of the countryside from inappropriate development
- Protecting designated areas of countryside from inappropriate development and continuing to assess areas for designation.

**8.41** The SPPS provides regional guidance on the protection of areas of the countryside that exhibit exceptional landscapes, such as mountains, stretches of the coast or lough shores and certain views and vistas wherein the quality of the landscape and unique amenity value is such that development should only be permitted in exceptional circumstances. It states that where appropriate these areas should be designated as Special Countryside Areas (SCAs) to ensure their protection from unnecessary and inappropriate development.

**8.42** Reference is also made to the protection of SCAs within PPS21. It states there are some areas of the countryside with exceptional landscapes where the quality of the landscape and unique amenity value is such that development should only be permitted in exceptional circumstances. It specifically notes the example of the High Mournes. It further notes that local policies will be brought forward to protect the unique qualities of these designated areas.

### Local Context

**8.43** The ADAP did not designate any areas of the former Down Council Area as SCAs. The BNMAP designated the following three areas in the former Newry and Mourne Council Area as SCAs.

- The High Mournes
- The Ring of Gullion (includes Slieve Gullion, Camlough Mountain, Slievenacappel, Slievebrack and Jonesborough Mountain)
- Slieve Croob (includes the central section of the Slieve Croob uplands around the summit of Slieve Croob and Legananny Mountain).

**8.44** These sensitive upland landscapes were considered to be of such an exceptionally high scenic quality that it was deemed necessary to protect them from development in all but exceptional circumstances. Policy COU1 of BNMAP sets out the two exceptions as:

- Development must be of such national or regional importance as to outweigh any potential detrimental impact on the unique qualities of the upland environment
- The consolidation of existing development providing it is in character and scale, does not threaten any nature conservation or built heritage interest and can be integrated with the landscape.

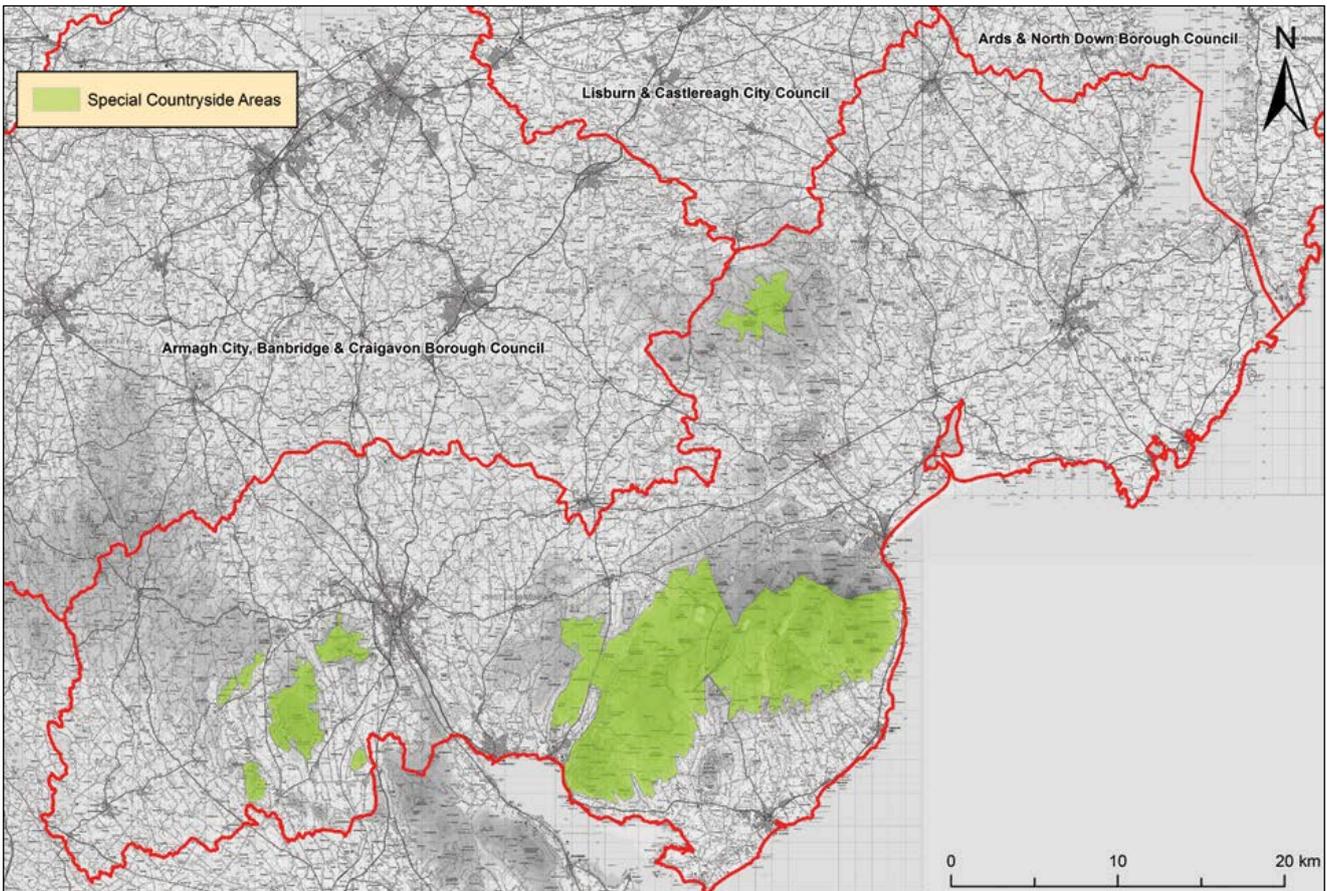
**Environmental:**  
Protecting and Enhancing the Environment

## Local Development Plan

### Key Issue 22 - Sensitive Upland Landscapes

**8.45** Map 16 shows these three designations in the context of the district. It highlights the issue with the current level of protection afforded to our sensitive uplands as both The High Mournes and Slieve Croob extend across the former Council boundary upon which the development plans were based.

As a result only that portion of the High Mournes and Slieve Croob located within the legacy Newry and Mourne district are afforded the additional protection of SCA designation while those portions located within the legacy Down district are not afforded the same level of protection.



Map 16: Existing Special Countryside Areas

**8.46** The Environment and Spatial Development Thematic Delivery Plan for the Council's Community Plan seeks to promote greater collaboration around protecting and enhancing the environmental assets in the district.



Slieve Binnian

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**Environmental:**

Protecting and Enhancing the Environment

# Options for Sensitive Upland Landscapes

## Option 1

**No Special Countryside Areas designated.**

This option would remove the existing SCA designations and would afford no additional protection to these exceptionally scenic and sensitive upland areas. All development proposals would be assessed on their individual merits under existing and any carried forward policies.

## Option 2

**Maintain the status quo. This would carry across existing designations as contained in the BNMAP.**

This would retain the imbalance of designations across the High Mourne and Slieve Croob with only those areas covered by the extant BNMAP being afforded protection.

## Option 3

**Review and extend Special Countryside Areas.**

This option enables a review of the existing designations to ensure they are appropriate and to make any necessary changes including extending, reducing or removing the designation. It will also seek to balance the protection afforded to our sensitive upland landscapes by extending the existing SCAs (High Mourne and Slieve Croob) as designated under the BNMAP to those corresponding upland landscapes within the former Down district which are not currently afforded any additional protection.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Option 3 scored significantly positive for landscape character. It also scored positively in terms of physical resources, biodiversity and built and cultural heritage. In comparison Options 1 and 2 scored negatively on a number of the same objectives that Option 3 scored positive for with Option 1 scoring significantly negative for landscape character.

### Preferred Option:

## Option 3

### Justification

Option 3 is the Council's preferred option as it will allow for a uniform approach across the entire district, ensuring that the most exceptional and vulnerable landscapes are afforded appropriate protection. It also provides the opportunity to review the existing designations to ensure their integrity is protected.



- Q* Do you agree with the Council's preferred approach? If not, why?
- Q* Do you think there are any other landscapes that exhibit exceptional characteristics within our district that should be considered for SCA designation? If so, where and why?

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## Key Issue 23

# Coastal Erosion and Land Instability

**8.47** Coastal erosion can be defined as the removal of material from the coast by wave action, tidal currents and/or the activities of humans, typically causing a landward retreat of the coastline. Whilst coastal erosion is a natural process it does have the potential to cause issues where land retreats to a point where it impacts on day-to-day activities by causing flooding, rock falls, loss of land and damage to infrastructure. The Rivers Agency Preliminary Flood Risk Assessment estimates that 19.5% of NI's coastline is suffering from coastal erosion.

### Regional Policy Context

**8.48** The RDS seeks to facilitate mitigation and adaption to climate change and to identify key assets and areas that are at risk through climate change. In adapting to climate change it is essential that we maintain accurate and reliable information about key assets. These include the effects on species, habitats and health as a result of warmer temperatures, storms, floods, rising sea level, coastal erosion and the coastal squeeze caused by habitats that are trapped between a fixed landward boundary, such as a sea wall and rising sea levels.

**8.49** Regional Guidance RG11 of the RDS seeks to conserve, protect and where possible, enhance our built heritage and our natural environment. It specifically notes that coastal areas need to be protected from coastal squeeze to safeguard against loss of distinctive habitats and help adaption to climate change. It also notes that the landscape setting of features should be conserved.

**8.50** The SPPS aims to protect the undeveloped coast from inappropriate development, consistent with the RDS; and to support the sensitive enhancement and regeneration of the developed coast largely within coastal settlements. It states that development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability. The LDP should identify these areas.

**8.51** The SPPS notes the planning system should avoid development in areas with increased vulnerability to the effects of climate change, particularly areas at significant risk of flooding, landslip and coastal erosion and highly exposed sites at significant risk from impacts of storms.

**8.52** The SPPS states that developments which propose raising land above the coastal flood plain should not generate a present or future need for flood defences nor should it exacerbate problems of coastal erosion in susceptible areas.

**8.53** Planning Policy Statement 15: Planning and Flood Risk (PPS15) sets out the regional policy requirements for development and flood risk. Policy PSU10 of PSRNI has been superseded by PPS15 insofar as it relates to flooding however much of the PSRNI policy is retained. In relation to erosion and land instability it states that development will not normally be permitted where expensive engineering works would be required either to protect development on land subject to erosion by the sea, or to defend land at risk of flooding. This policy also sets out the requirements for development proposed on land identified as being at risk of instability.



South Promenade, Newcastle

**8.54** Currently the Department for Agriculture, Environment and Rural Affairs (DAERA) and DfI are collectively reviewing the issue of coastal erosion/coastal change management at a regional level across NI. As a consequence a regional approach to the coastal erosion/coastal change management issue may be forthcoming in the near future and may subsequently guide and inform local planning policy as councils seek to address the challenges of a changing coastal landscape.

### Local Context

**8.55** The district has approximately 160km of coastline covering parts of Strangford Lough, the Irish Sea and Carlingford Lough. This extensive and varied coastline is of national and in some parts international significance. It is therefore important that the character and environmental qualities of the district's coast are protected from inappropriate development and that development which requires a coastal location is directed to the least environmentally sensitive areas.

**8.56** The extensive use of shoreline protection along many parts of the County Down coastline has been a major contributing factor to shoreline erosion and instability to date.

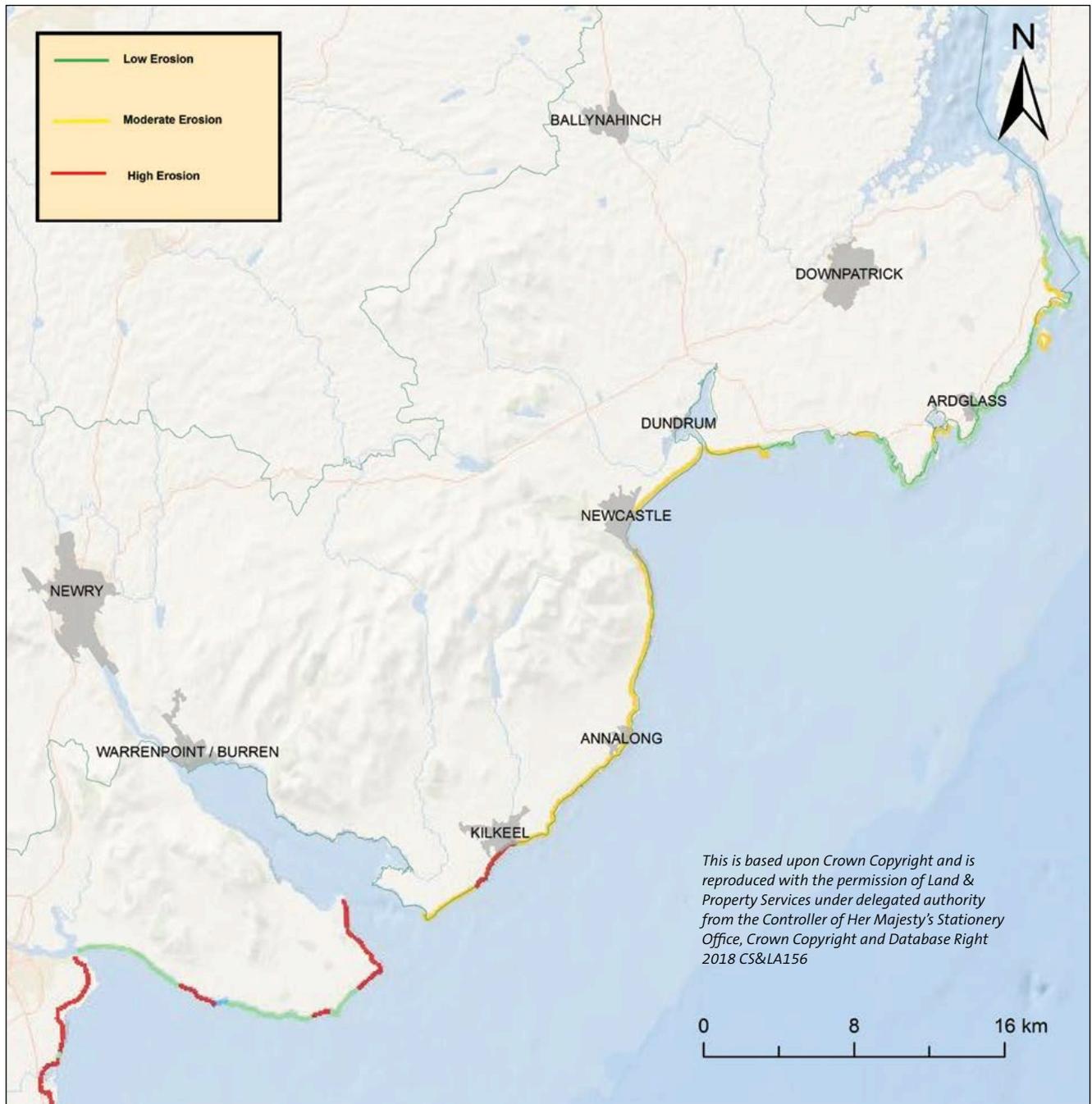
**8.57** BNMAP does not identify the issue of coastal erosion or land instability. While ADAP does not specifically identify these issues it recognises that sand extraction from beaches is a persistent environmental problem in NI as it is a finite and non-renewable resource. It explains its removal impacts on coastal ecology and may also affect the stability of coastal infrastructure, leading to an increase in coastal erosion. Within the district the ADAP identifies Tyrella beach as being the subject of sand extraction and notes there is a need to control the extraction of sand/gravel from within the coastal zone in order to ensure there is no irreparable damage to features of importance including shoreline stability.



**Environmental:**  
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## Local Development Plan

### Key Issue 23 - Coastal Erosion and Land Instability



Map 17: Existing and Potential Areas of Coastal Erosion across the Council District

Source: European Atlas of the Seas

# Options for Coastal Erosion and Land Instability

## Option 1

### Maintain the status quo.

No areas of existing or potential coastal erosion and land instability identified. Development will continue to be assessed on a case-by-case basis in line with the SPPS and any carried forward PSRNI policies.

This option maintains the status quo, however, it does not identify areas where there is potential for coastal erosion or land instability within the district beyond what is detailed in the current ADAP. Therefore it is not considered to adequately address the issue of coastal erosion and land instability along the district's coast.

## Option 2

### Targeted and preventative approach.

The LDP would identify those areas to be most at risk from existing and potential coastal erosion (subject to detailed data being available). There would be a presumption against development within these identified areas. Elsewhere development would be assessed on a case-by-case basis in line with the SPPS and carried forward PSRNI policies.

This option may be overly restrictive and does not allow for varying circumstances between areas and proposals.

## Option 3

### Targeted and measured approach.

Identify areas of existing and potential coastal erosion and land instability. Within these areas adopt a high level criteria based policy on coastal erosion and land instability. This could include the following:

- Development proposals should avoid areas identified as being vulnerable to coastal erosion and land instability. The only exceptions permitted would be where there is a demonstrated need for a coastal location
- Where there is a need demonstrated, the development proposal will be required to be accompanied by a coastal change vulnerability assessment. An assessment would show the impact of development on any existing coastal defence infrastructure and whether new infrastructure is required
- Proposals for new or replacement coastal defences could be permitted where it can be demonstrated that they work with natural processes and there will be no significant adverse impact on the coast or habitats and the development will not result in increased coastal erosion or flooding elsewhere on the coastline.

Elsewhere, development will be assessed on a case-by-case basis in line with the SPPS and carried forward PSRNI policies.

This option would be less restrictive than Option 2 as it would assess each proposal on its individual merits ensuring that decisions are informed by bespoke and detailed assessments of the potential impacts/risks involved with individual proposals to ensure there is no negative impact on coastal erosion and land instability.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates that Options 2 and 3 scored positively on a number of the same objectives including protection of physical resources, climate change, water resources and built and cultural heritage. Option 3 scored positively for economic growth as it provided flexibility for exceptional circumstances subject to bespoke protection. Options 1 and 2 scored uncertain for economic growth. Option 2 scored positively for landscape character given the presumption against development whilst option 3 scored neutral.

### Preferred Option:

## Option 3

### Justification

Option 3 is the Council's preferred option as it allows the specific details and impacts of any proposed development to be assessed ensuring there will be no negative impact on coastal erosion or land instability.



- Q Do you agree with the Council's preferred option and the criteria required? If not, why?
- Q Are there any alternative options the Council should consider to address coastal erosion?
- Q Is there a need for any bespoke policies tailored to specific stretches of the coast?

**Environmental:**  
Protecting and Enhancing the Environment

## Key Issue 24

# Flood Risk Management

**8.58** There are four main sources of flooding. Flooding from rivers (fluvial flooding), coastal flooding, surface water (pluvial flooding) and flooding from impounded water bodies such as reservoirs or dams. The effects of flooding on human activity are wide ranging. It has potential to cause fatalities and injury, displacement of people, pollution and health risk (through contaminated water), loss of drinking water, damage to buildings and the environment and to severely compromise economic activities<sup>1</sup>.

**8.59** Surface water (or pluvial flooding) occurs as a result of high intensity rainfall which can overwhelm natural or man-made drainage systems resulting in water flowing overland<sup>2</sup> or collecting in low-lying areas. Surface water run-off and flooding has increased steadily with the loss of open spaces and the expansion of urban areas. DfI estimates that surface water accounts for 50% of recent flood events in NI.

**8.60** It is particularly a problem in urban areas which are often dominated by impermeable surfaces and limited vegetation or open spaces. This form of development inhibits natural run-off processes by removing opportunities for surface water storage and infiltration into the ground. It also tends to rely upon man-made drainage systems, even the most modern of which, are only designed to cope with a 1 in 30 year rainfall event.

**8.61** Climate change is likely to exacerbate this existing problem as it is predicted there will be an increase in overall winter precipitation as well as an increase in the intensity and duration of extreme rainfall events.

**8.62** The use of Sustainable Drainage Systems (SuDS) offers an opportunity to deliver effective drainage at source and reduce flood risk elsewhere. They seek to mimic natural drainage processes in order to reduce run-off rates, volume and frequency. They can be introduced at a range of scales from individual premises to regional level.

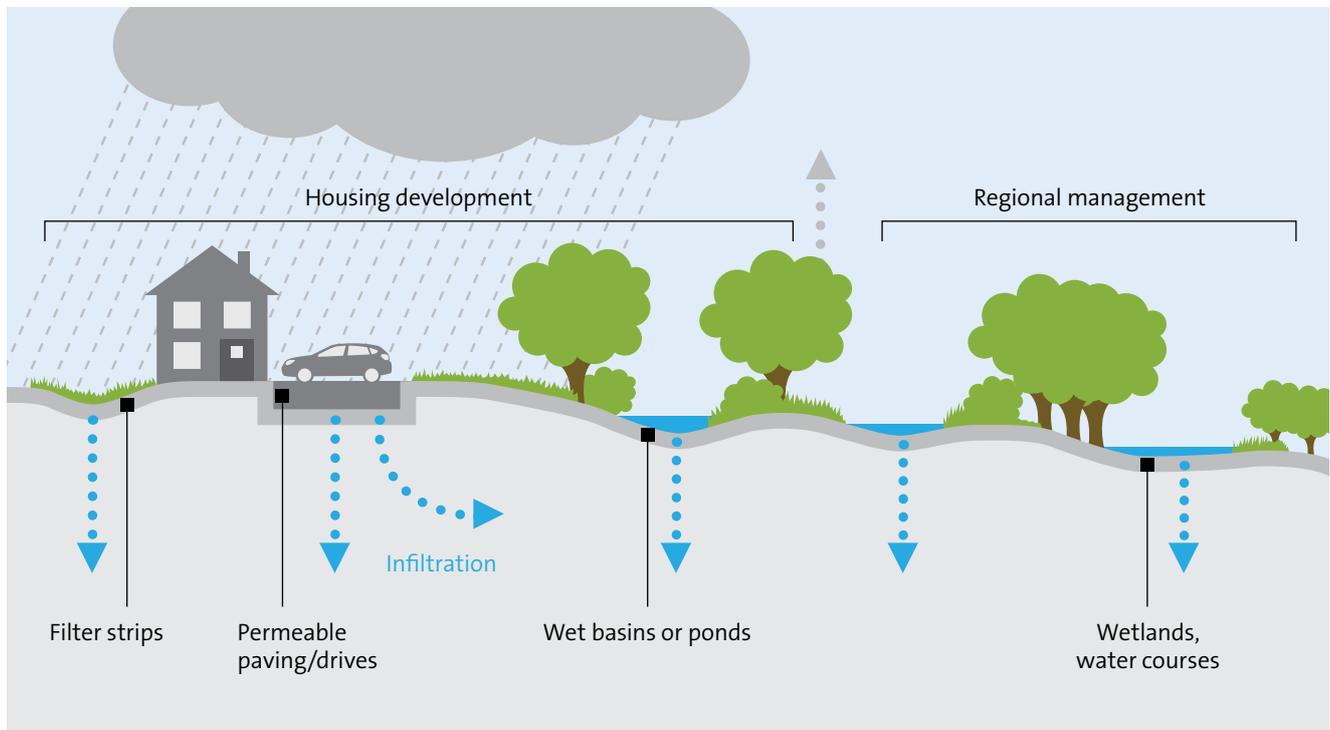
<sup>1</sup> PPS 15 (Revised) Planning and Flood Risk

<sup>2</sup> PPS 15 (Revised) Planning and Flood Risk

**Environmental:**  
Protecting and Enhancing the Environment

## Local Development Plan Key Issue 24 - Flood Risk Management

Figure 17: Incorporating Sustainable Drainage Systems in New Development



Source: Susdrain/CIRIA

**8.63** SuDS come in two forms, those often referred to as ‘soft’ SuDS which include features such as basins and ponds and ‘hard’ which include features such as oversized pipes and storage tanks. Each type has pros and cons and the use of which type will depend on various factors including site specific aspects such as size and topography. Careful consideration of the many benefits and opportunities of SuDS early in the planning process should ensure the delivery of the best results appropriate in each case.

**8.64** The management and maintenance of SuDS is of critical importance for their delivery and successful operation. This is particularly important for ‘soft’ SuDS that are often associated with higher maintenance costs that exceed those of areas of general open space. As a result this can represent a significant barrier to their adoption by a local authority. ‘Hard’ SuDS can lend themselves more to being adopted by NI Water, if they meet the required standards for adoption. However, they tend to have limited environmental benefits in terms of biodiversity or creation of green space. Any requirement for SuDS through the planning system therefore needs to also address the future management and maintenance issue.

## Regional Policy Context

**8.65** The RDS states that whilst action is required internationally, it is important that NI plays its part in preparing for the impacts of climate change. It recognises flooding as one of the key risks of climate change. RG10 refers specifically to mitigating and adapting to climate change. It acknowledges that flooding is a natural phenomenon that cannot be entirely prevented. As a result it seeks to minimise development in areas at risk from the various sources of flooding, including

surface run-off. It therefore requires a precautionary approach to development in areas of flood risk, using the latest flood risk information that is available. It recognises the need to develop our towns and cities in a manner that avoids the risk where possible and states that developments in areas, even those outside flood risk areas, should incorporate SuDS. RG12 also encourages greater use of SuDS, particularly as part of significant development proposals, to reduce the risk of flooding and protect water quality.



**Environmental:**

Protecting and Enhancing the Environment

## Local Development Plan

### Key Issue 24 - Flood Risk Management

**8.66** The aim of the SPPS in relation to flood risk is to prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere. It requires LDPs to apply a precautionary approach to development in areas that may be subject to flood risk now, or in the future as a result of climate change. It states that the planning system should adapt to and mitigate climate change by working with natural environment processes. As a result it promotes the development of green infrastructure and the use of SuDS to reduce flood risk and improve water quality.

**8.67** PPS15 also sets out a precautionary approach for development plans and states the LDPs should not bring forward sites or zone land that may be susceptible to flooding, or that would increase the risk of flooding elsewhere, now or in the future, unless in exceptional circumstances. In the management of development that is likely to be at risk of surface water flooding it requires consideration to be given to the use of SuDS as the preferred drainage solution.

**8.68** The Preliminary Flood Risk Assessment for Northern Ireland, which was published in 2011 by the then Rivers Agency, estimated that around 20,000 or some 2.5% of properties in NI were at risk of surface water flooding from a 1 in 200 year pluvial event with a depth greater than 300mm. It further notes that surface water flood risk modelling has indicated that the risk to people, property and key services may increase by around 30% as a result of climate change by 2100.

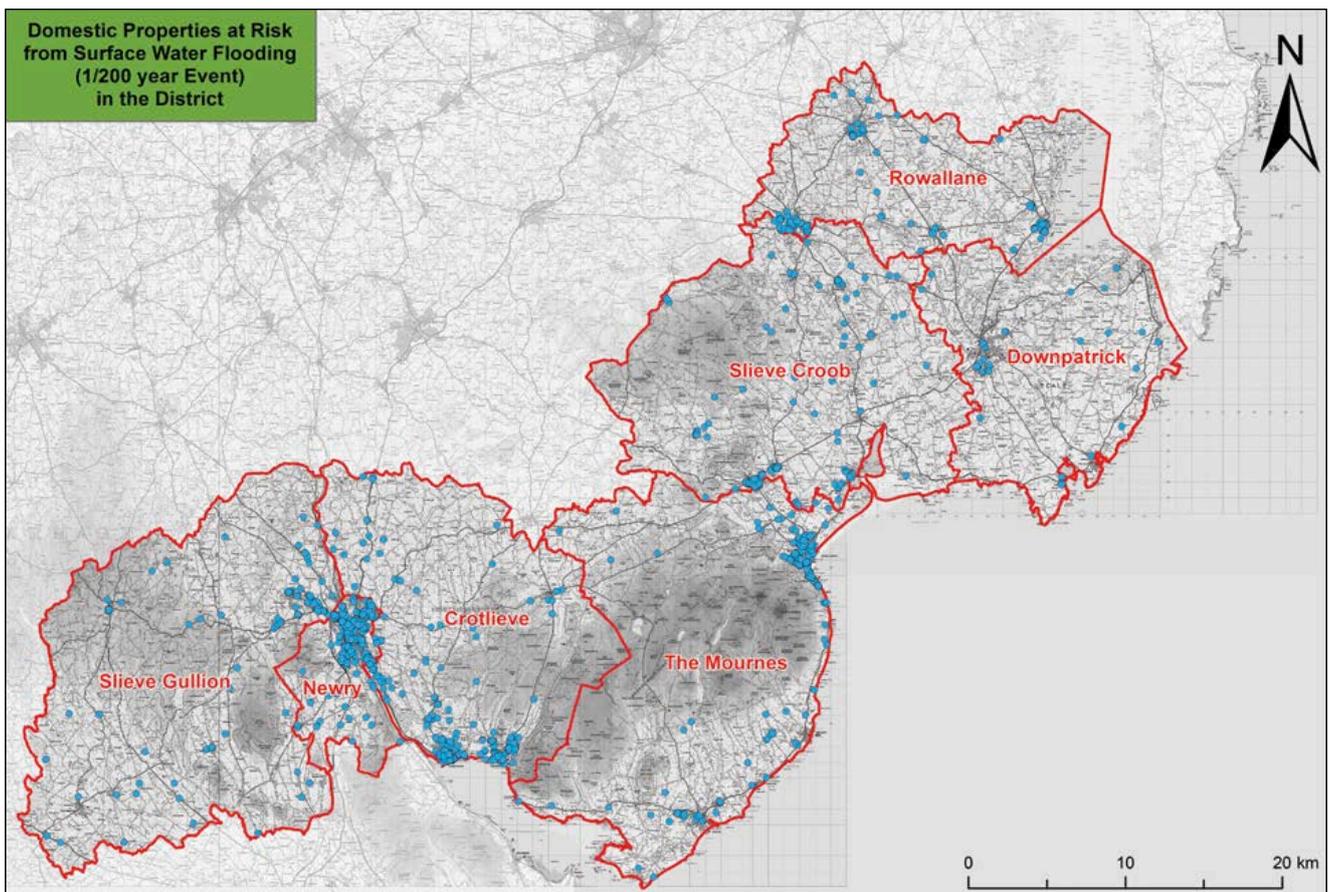
**8.69** In managing development, particularly in areas susceptible to surface water flooding, planning authorities should encourage developers to use SuDS. LDPs should promote sustainable drainage within the plan area, for example by requiring such solutions, where appropriate to individual zonings, as a key site requirement.

#### Local Context

**8.70** DfI Rivers has produced a suite of maps based on flood data and projections for various sources of flooding including surface water flooding. The LDP will use this data, and any updated versions, to identify land at greatest risk of flooding.

**8.71** Map 18 below shows the geographical distribution of domestic properties at risk of surface water flooding in the district in a 1 in 200 year event. As expected, surface water run-off and flooding is predominantly experienced in urban areas where development inhibits the natural run-off process. The settlements identified as being at significant risk of surface water flooding within the district are Newry, Warrenpoint, Rostrevor, Newcastle, Downpatrick, Ballynahinch and Saintfield.

**8.72** The LDP will take account of the potential risks from all sources of flooding over the plan period and beyond when zoning land. Within areas of flood risk, now or in the future as a result of climate change, a precautionary approach to development will be applied in line with regional policy. Outside of such areas it may still be appropriate for the LDP to mitigate against the risk of possible flooding, for example, by requiring susceptible areas within development sites to be retained as open space.



Map 18: Domestic Properties within the District at Risk from Surface Water Flooding

Crown Copyright and Database Right 2018 CS&LA156

**8.73** Both BNMAP and ADAP identify the main areas of flooding affecting particular settlements in the district. They also acknowledge the government's promotion of SuDS but do not include any further information.

**8.74** The Community Plan identifies SuDS as a key area that should be researched with opportunities identified and seeks to promote and support community resilience measures within identified flood risk areas. The Community Plan Thematic Group for Environmental and Spatial Development seeks to support the production of fluvial and coastal management plans and to ensure that flood mitigation and prevention is incorporated within the LDP including promoting 'soft' engineering methods.

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**Environmental:**

Protecting and Enhancing the Environment

# Options for Flood Risk Management

## Option 1

**Precautionary approach towards development in flood prone areas in line with the SPPS and carried forward PPS15 policies.**

This option maintains the status quo and therefore it does not extend beyond the current encouragement of the use of SuDS in new development as set out in regional policy.

## Option 2

**Precautionary approach toward development in flood prone areas as with Option 1.**

**In addition the Council would seek to address the issue of surface water flooding with SuDS being required on zoned sites through the use of key site requirements or alternatively incorporated into a new policy covering SuDS for all new development.**

This option extends beyond the scope of current regional policy which simply encourages the use of SuDS. It seeks to address the issue of surface water flooding in the district by requiring the use of SuDS in new developments.

## Sustainability Appraisal Summary

The assessment of alternatives within the SA Interim Report indicates both options scored positively in terms of climate change, water resources and biodiversity with Option 2 scoring significantly positive for water resources. It was noted that Option 2 was slightly more positive for physical resources and built and cultural heritage.

### Preferred Option:

## Option 2

### Justification

Option 2 is the Council's preferred option as it represents the most comprehensive approach to surface water flooding and sustainable drainage on sites. The option also allows for SuDS to be required either on all new development or on identified zoned sites through the imposition of key site requirements. This option represents an opportunity to adapt to climate change and enhance flood prevention measures within the district.



- Q Do you agree with the Council's preferred approach? If not, why?
- Q Do you think SuDS should be required in all new developments through a new SuDS policy; Or should SuDS only be required on identified zoned sites by way of key site requirements?
- Q How do you consider SuDS should be managed and maintained?

9 | Next Steps



Tollymore Forest Park, Newcastle



Ballymacdermot Court



Slieve Gullion

## 9. Next Steps

**9.1** Following the 12 week consultation period all responses received will be assessed by the Council. A summary of all representations received will be presented in the form of a Public Consultation Report. This report will detail the strategic issues raised in the consultation responses. All representations will be held on a database which will be used for the preparation of the LDP in accordance with the provisions of the General Data Protection Regulation 2016. It should be noted that your responses are public documents and may be disclosed following receipt of a request under the Freedom of Information Act 2000 or Environmental Information Regulations 2004. The Public Consultation Report will be published on the Council's website and will also be considered during the Independent Examination of the Plan Strategy.

**9.2** Representations addressing issues raised in the POP should be strategic in nature, as the Council will use the findings from the POP consultation to inform the preparation of the draft Plan Strategy. Those wishing to submit representations of a site specific nature will have the opportunity to do so at the Local Policies Plan stage and the Council will only consider these type of representations at that stage. The Council's LDP Timetable gives indicative timescales for the publication of both the draft Plan Strategy and draft Local Policies Plan and is also available to view and download from the Council website.

**9.3** The POP represents an opportunity for all those with an interest in the district to engage in the plan making process from the outset and so influence the future direction of our new LDP.

## Local Development Plan

# Appendix 1: Glossary

**Active Travel** – An approach to travel and transport by physically active, human powered modes, as opposed to motorised ones.

**Affordable Housing** – Relates to social rented housing and intermediate housing. These are defined as follows: Social Rented Housing, i.e. housing provided at an affordable rent by a Registered Housing Association; and Intermediate Housing, i.e. shared ownership housing provided through a Registered Housing Association (eg the Co Ownership Housing Association) and helps households who can afford a small mortgage, but that are not able to afford to buy a property outright.

**Annual Monitoring Report** – Undertaken as part of the final stage in the LDP preparation process an Annual Monitoring Report will specify the amount of housing and economic land, the number of housing completions and any other relevant information regarding the implementation of the LDP.

**Areas of Archaeological Potential** – Areas identified within settlement limits where, based on current knowledge, it is likely that archaeological remains will be encountered in the course of continuing development and change. These are highlighted in LDPs for the information of prospective developers.

**Areas of Constraint on Minerals Development** – A designation which aims to protect the most valuable and vulnerable features of the natural environment and man-made heritage including areas of high scenic value from the adverse effects caused by the development of mineral resources.

**Areas of High Scenic Value** – Areas of High Scenic Value are designated by some Development Plans in recognition of their special landscape quality.

**Areas of Outstanding Natural Beauty (AONB)** – A designation in recognition of areas of national importance as their landscapes possess a distinctive character and landscape features of high scenic value.

**Area of Significant Archaeological Interest** – Areas designated in order to protect not just the individual sites and monuments but the overall landscape setting within which they are located.

**Areas of Special Scientific Interest** – Protected sites that are of special interest by reason of their flora, fauna, geological or physiological features designated under the Environment (Northern Ireland) Order 2002 (as amended). Sites are protected to conserve biodiversity and geodiversity.

**Area of Townscape Character (ATC) / Area of Village Character (ATV)** – An Area of Townscape Character / Area of Village Character is a designated area within a town / village which exhibits distinctive character or intrinsic qualities, often based on its historic built form or layout.

**Brownfield** – Land that has previously been developed. May include vacant or derelict land, infill land, land occupied by redundant or unused buildings and developed land.

**Built Heritage** – Built heritage consists of aspects of the man-made historic environment such as houses, factories, commercial buildings, places of worship, cemeteries, monuments and built infrastructure such as roads, railways and bridges; physically created places such as gardens, and other places of historical significance such as archaeological sites.

**Coastal Erosion** – Coastal erosion is the wearing away of materials from the coast by wave action, tidal currents, and/or the activities of humans, typically resulting in a landward retreat of the coastline.

**Committed Sites** – A committed site is a site on which planning permission has been granted.

**Community Plan** – The Community Plan (Living Well Together) is a Council led community partnership strategy which represents a vision of how public services can be better planned and delivered, and has five key outcomes to improve the quality of life for all residents in Newry, Mourne and Down. The Strategic Policy Planning Statement 2015 states that the LDP will provide a spatial land use reflection of the Community Plan linking public and private sector investment through the land use planning system.

**Conservation Area (CA)** – Conservation Areas are designated areas of special architectural or historic interest. The SPPS notes that in managing development within a CA the guiding principle is to afford special regard to the desirability of enhancing its character or appearance where an opportunity to do so exists, or to preserve its character or appearance where an opportunity to enhance does not arise.

**Development Management** – The process of receiving, assessing and deciding planning applications and providing related information and advice to customers, the general public and other stakeholders.

**Equality Impact Assessment (EQIA)** – A process designed to ensure that a policy, procedure, project or scheme is fair to all and does not discriminate or disadvantage any people or group. It seeks to identify and address any adverse or negative impact.

**Footfall** – Footfall is the number of people entering a shop or a shopping area at a given time.

**Fuel Poverty** – A household is in fuel poverty if, in order to maintain an acceptable level of temperature throughout the home, the occupants would have to spend more than 10% of their income on all household fuel use.

**Gateways** – Defined in the RDS as strategically important transport interchange points which connect ports and airports to the internal transport network.

**Geotourism** – The National Geographic Society defines Geotourism as ‘tourism that sustains or enhances the geographical character of a place—its environment, culture, aesthetics, heritage, and the well-being of its residents.’

**Green and Blue Infrastructure** – Green and blue infrastructure is a phrase used to describe all green and blue spaces in and around our towns and cities. The term enables the consideration of the collective value of all of these spaces together. Constituent elements of green and blue infrastructure include parks, private gardens, agricultural fields, hedges, trees, woodland, green roofs, green walls, rivers and ponds. The term covers all land containing these features, regardless of its ownership, condition or size. It is all green and blue spaces in and around our towns and cities.

**Greenfield** – Undeveloped land or green space.

**Greenway** – A Greenway is a public path or route often developed from disused rail track beds for active or sustainable travel usually used for recreational walking or cycling.

**Historic Building of Local Importance** – A building, structure or feature, whilst not statutory listed, has been identified by the Council as an important part of their heritage, due to its local architectural or historic significance.

**Habitats Regulations Assessment** – Section 102 of the Conservation of Habitats and Species Regulations (2010) requires a Habitats Regulations Appraisal (HRA) to be undertaken during the preparation of a LDP, if necessary.

**Historic Parks, Gardens and Demesnes of Special Interest** – Important designated features contributing to the landscape's appearance. Many are distinguished by their carefully composed design of trees, meadows and water features, perhaps as a setting for a house. Some have valuable tree plantations, shrubs or plants, while others may provide a significant historical record, of a particular era or show how the design of a parkland or garden has changed over the centuries.

**Housing Growth Indicators (HGIs)** – The RDS introduces the concept of having housing growth indicators applied to the region. Their purpose is to direct the distribution of housing in the region over the period to 2025, through the development plan process, in accordance with the Spatial Development Strategy.

**Housing Monitor** – The purpose of a housing monitor is primarily to inform local development plan preparation by assessing the extent of housing land available within an area and the estimated number of units that this could accommodate. It will also help the Council identify where a potential shortfall in land supply might exist and serve to inform house builders on the availability of land that may be suitable for housing.

**Housing Needs Assessment (HNA)** – Is an assessment of local housing needs undertaken by NIHE primarily in relation to general needs, social housing, supported housing, affordable housing and travellers accommodation.

**Hubs** – The Regional Development Strategy spatial framework guidance defines most large towns in Northern Ireland as either main hubs or local hubs.

**Independent Examination** – The Department will appoint the Planning Appeals Commission (PAC) or other independent examiners to hold an IE. The IE will examine the draft Plan Strategy against soundness tests which will relate to how the Plan Strategy has been produced, and how it has taken account of central government plans, policy and guidance, and also its coherence, consistency and effectiveness. Similarly an Independent Examination will also examine the draft Local Policies Plan.

**Industrial Policy Areas** – An Industrial Policy Area is an area designated within the Development Plan, often with a previous industrial use, for the purposes of industry or employment.

**Intermediate Housing** – Intermediate housing consists of shared ownership housing provided through a Registered Housing Association and helps eligible households who can afford a small mortgage, but that are not able to afford to buy a property outright. The property is split between part ownership by the householder and part social renting from the Registered Housing Association.

**Key Transport Corridor** – These are main arterial road and rail corridors which form part of the Regional Strategic Transport Network as defined in the RDS. There are 5 Key Transport Corridors throughout Northern Ireland.

**Key Site Requirements** – Key Site Requirements are stipulated within the Development Plan and provide the detail of what would be required to be provided as part of the development of a zoned site.

**Lifetime Homes** – A set of 16 design criteria that provide a model for building accessible and adaptable homes to meet the needs of the occupier over their lifetime

**Listed Building** – Listed Buildings are buildings of special architectural or historic interest that are afforded statutory protection.

**Local Development Plan (LDP)** – The Local Development Plan provides a broad land use policy framework for the physical development of the District. When adopted, the Newry, Mourne and Down Local Development Plan will become the statutory land use planning document for the area.

**Local Policies Plan (LPP)** – The Local Policies Plan will be prepared once the Plan Strategy is adopted. It will focus on each settlement by defining settlement limits, land use zonings, environmental designations, and introducing bespoke policies as appropriate to individual places.

**Masterplan** – A plan that outlines an overall development concept for an area, including urban design, landscaping, infrastructure, service provision, circulation, present and future land use and built form. It provides a structured approach and creates a clear framework for the future development of an area.

**Material Consideration** – A material consideration is a matter that should be taken into account in the determination of planning applications or appeals against a planning decision.

**Micro-generation** – Micro-generation is widely accepted to be the production of heat (less than 45kW capacity) and/or electricity (less than 50kW capacity) from low or zero carbon energy sources.

**Mineral Safeguarding Zones** – Designated in some Development Plans to protect mineral deposits of economic or conservation value. They can also be used to ensure that workable mineral resources are not sterilised by surface development.

**Mixed-Use Development** – Mixed-use development contains several different land uses on a site. This could include residential, commercial, cultural, institutional, or economic development or other uses.

**National Nature Reserve** – An area designated for its special flora, fauna, geological or other special feature for conservation purposes. They are designated and maintained by the Northern Ireland Environment Agency.

**National Playing Fields Association (NPFA) Standard** – This is a national standard which recommends a minimum of 2.4 hectares of outdoor playing space per 1000 population. This is commonly referred to as the 'Six Acre Standard', comprising of 4 acres (1.6 hectares per 1000 population) for outdoor sport provision and 2 acres (0.8 hectares per 1000 population) for children's play. This has now been renamed as the Fields in Trust (FIT) Standard.

**Natural Heritage** – Refers to the sum total of the elements of biodiversity, including flora and fauna and ecosystem types, together with associated geological structures and formations (geodiversity).

**Non-Designated Heritage Assets** – These include non-listed vernacular buildings or historic buildings of local importance which make a positive contribution to the local character of the district by displaying local traditions of architecture or design.

## Local Development Plan

# Appendix 1: Glossary (cont'd)

**Northern Ireland Multiple Deprivation Measure** – The Northern Ireland Multiple Deprivation Measure 2010 is the official measure of spatial deprivation in Northern Ireland.

**Not-Spot** – An area which receives no or limited telecommunication reception.

**Open Space** – Open Space as defined in PPS8 is taken to mean all open space of public value, including not just land, but also inland bodies of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and outdoor recreation and can also be important for visual amenity.

**Passive Solar Design** – Passive solar design refers to the use of the sun's energy for the heating and cooling of buildings.

**Plan-led** – A Plan-led planning system gives primacy to the Plan in the determination of planning applications unless other material considerations indicate otherwise.

**Planning Appeals Commission (PAC)** – The PAC is an independent body which deals with a wide range of land use planning issues and related matters. The PAC's functions generally fall into two broad categories, deciding on appeals arising from individual planning applications and Hearing and Reporting on Public Inquiries, Hearings and Examinations.

**Planning Policy Statements (PPSs)** – These provide strategic direction and guidance in the form of regional planning policy and are a material consideration in preparing development plans and dealing with individual planning applications.

**Planning Strategy for Rural Northern Ireland (PSRNI)** – The Planning Strategy for Rural Northern Ireland sets out planning policy for Northern Ireland across a range of topics. Most of the topics within the Strategy have been superseded by the various PPS's or SPPS.

**Plan Strategy** – The Plan Strategy outlines the strategic aims and objectives of the Local Development Plan. It is prepared following consultation on the Preferred Options Paper. Together with the local policies plan, it will be the principle consideration when determining future planning applications for development in the Newry, Mourne and Down District Council area.

**Pluvial Flooding** – Pluvial (surface water) flooding occurs when an extremely heavy downpour of rain saturates drainage systems and the excess water cannot be absorbed.

**Preferred Options Paper (POP)** – The Preferred Option Paper is a consultation document, intended to promote focused debate on strategic issues that will need to be addressed when preparing the draft Plan Strategy.

**Preparatory Papers** – A series of topic papers produced to establish the main social, economic and environmental characteristics, key issues and needs of the plan area.

**Programme for Government** – The NI Programme for Government is the highest level strategic document of the Executive – setting out the priorities that it will pursue in the current Assembly mandate, and the most significant actions it will take to address them.

**Protected Route** – A Protected Route is a Development Plan designation which gives additional control over the number of new accesses and the level of use of existing accesses onto the protected route.

**Ramsar Sites** – A designated wetland site of international importance under the Ramsar Convention 1971.

**Regional Development Strategy (2035)** – The Regional Development Strategy sets the context for the sustainable development of Northern Ireland to 2035. The RDS acts as the spatial strategy of the Northern Ireland Executive's Programme for Government. The RDS was revised in 2010 to reflect the changing development of Northern Ireland and continues to set the overarching planning framework for the region.

**Regional Strategic Transport Network (RSTN)** – The RSTN incorporates 5% of the road network, which carries around 37% of total vehicle travel, and all of the railway system.

**Renewable Energy** – Any naturally occurring source of energy such as solar, wind, tidal wave, biomass and hydroelectric power that is not derived from fossil or nuclear fuel.

**Rural** – The definition of 'rural' commonly employed within Northern Ireland is based upon the Interdepartmental Urban-Rural Definition Group's review of statistical classification and delineation of settlements. Using this measure there is recognition that settlements of less than 5,000 people are recognised as rural.

**Rural Proofing** – Rural proofing is the process where any major policy and strategy are assessed to determine whether they have a differential impact on rural areas, and where appropriate, make adjustments within their plans to take account of particular rural circumstances.

**Section 75 Groups** – Key groups listed in section 75 of the Northern Ireland Act 1998 that traditionally have been under represented or disadvantaged. Section 75 requires all government departments, agencies and councils to consider these groups when creating policy.

**Sequential (approach/ test)** – An approach/ test used to identify suitable sites for development. For example in the instance of identifying sites for housing a sequential approach would require the focus to be on the re-use of previously developed land and buildings, underdeveloped and undeveloped land within the urban footprint, then extensions to cities and towns, next consideration would be given to a major expansion of a village or small rural settlement in exceptional circumstances before finally considering the development of a new settlement on greenfield land.

**Settlement Hierarchy** – A settlement hierarchy is a way of ranking settlements based upon their size, population and other criteria and is an important consideration in allocating housing growth and land for economic development through the LDP.

**Social Housing** – Housing provided by registered Social Landlords for rent. Such housing is allocated by reference to an approved Common Waiting List and allocation system.

**Soundness** – A set of key tests that underpin the Local Development Plan process, which require the Plan documents to be tested at the Independent Examination, in terms of the coherence, consistency and effectiveness of proposals, their conformity with relevant policies and the process by which they were produced. A document will be sound if found to meet these tests.

**Spatial Strategy** – A coherent long-term policy framework to guide and influence future development. It aspires to guide future development in an orderly, economic and sustainable manner.

**Special Areas of Conservation** – Are sites established under the EC Habitats Directive (92/43/EEC) and are designated to protect important habitats and species listed within the Directive.

**Special Countryside Areas (SCAs)** – An area of countryside where it is proposed to provide a stricter policy control for those sensitive landscapes which merit special protection.

**Special Protection Areas** – Are sites established under the European Commission Directive of Wild Birds (2009/147/EC), commonly known as the ‘Birds Directive’. SPAs are important areas for breeding, overwintering and migrating birds.

**Stakeholders** – Individuals or organisations who stand to gain or lose from the impact of a planning policy, proposal or decision. The term is used mostly to refer to bodies that will affect the delivery of a planning document’s policies and proposals.

**State Care Sites** – Archaeological sites and monuments are taken into the care of the Department for Communities under the Historic Monuments and Archaeological Objects (NI) Order 1995. State Care sites and monuments represent all periods of human settlement in Ireland from circa 7,000 BC to the 21st century.

**Statement of Community Involvement (SCI)** – The Council’s SCI describes how to get involved in the Planning Process and is available on the Council’s website at [www.newrymournedown.org](http://www.newrymournedown.org)

**Sterilisation** – Sterilisation of land occurs where the exploitation of resources is restricted or made impossible. This can be caused by infrastructure, buildings or water features.

**Strategic Environmental Assessment (SEA)** – The SEA is set out in European Directive 2001/42/EC and is transposed into Northern Ireland law by the ‘Environmental Assessment of Plans and Programmes Regulations (NI) 2004 (EAPP (NI) 2004), referred to as ‘SEA Regulations’. The SEA is a procedure that contributes to the integration of environmental considerations in the preparation and adoption of plans and programmes.

**Strategic Planning Policy Statement for Northern Ireland (SPPS)** – The Department of the Environment’s (now Department for Infrastructure) Strategic Planning Policy Statement (SPPS) published in 2015, sets out strategic subject planning policy for a wide range of planning matters. It also provides the core planning principles to underpin delivery of the two-tier planning system with the aim of furthering sustainable development. It sets the strategic direction for the new councils to bring forward detailed operational policies within future local development plans.

**Super Output Areas (SOA)** – Statistics produced by NISRA for a small geographical area.

**Supported Housing** – Supported Housing enables vulnerable people to live more independently, both in their own home and in the community, through the provision of housing related support services.

**Sustainability Appraisal – Interim Report** – Sustainability Appraisal Interim Report consists of SA Scoping Report and an assessment of reasonable alternatives against an agreed SA framework. It is subject to public consultation along with the POP.

**Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)** – The purpose of the Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of local development plans. It incorporates the more environmentally focused considerations of Strategic Environmental Assessment and is used to assess the POP against a set of objectives and criteria, to evaluate if it is likely to have significant impacts on the environment.

**Sustainable Development** – Meeting the needs of the present without compromising the ability of future generations to meet their own needs.

**Sustainable Drainage Systems (SuDS)** – SuDS are a sequence of water management practices that seek to alleviate the problems associated with hard and paved surfaces in urban environments, by storing or re-using surface water at source, thereby decreasing flow rates to watercourses and improving water quality.

**Traveller Accommodation** – Traveller Accommodation is accommodation specifically for the travelling community. Current policy allows for a grouped housing scheme, a serviced site, or a transit site where certain criteria are met and there is a demonstrable need.

**Urban** – The definition of ‘urban’ commonly employed within Northern Ireland is based upon the Interdepartmental Urban-Rural Definition Group’s review of statistical classification and delineation of settlements. Using this measure there is recognition that settlements of 5,000 or more people are recognised as urban.

**Urban Capacity Studies** – A study undertaken to assess the potential housing capacity of previously developed land within the built up areas of larger settlements.

**Use Classes Order** – The Planning (Use Classes Order (Northern Ireland) 2015 itemises certain similar uses of land and buildings into categories known as ‘Use Classes’. The main categories are Part A (Shopping and Professional Services), Part B (Industrial and Business uses), Part C (Residential issues) and Part D (Community, Recreation and Culture).

**Vernacular Building** – A building which reflects the local folk tradition and are typical of a common type of building in a particular locality.

**Viability** – A measure of a centre’s capacity to attract on-going investment for maintenance, importance and adaptation to changing needs.

**Vitality** – A measure of how busy a centre is.

**Wellbeing** – A good or satisfactory condition of existence; a state influenced by health, happiness and prosperity. For a larger group of people, it could be described as the welfare of that group.

**Windfall Housing Sites** – This is housing provision on undesignated sites in the Development Plan and as such, cannot be precisely anticipated. It can arise as a result, for example, of plot sub-division or property conversion and can normally make a significant contribution to the housing land supply over any Plan period.

## Local Development Plan

# Appendix 2: Lists of Maps, Tables and Figures

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## Appendix 3: Abbreviations

ADAP	Ards and Down Area Plan 2015	NISRA	Northern Ireland Statistics and Research Agency	SONI	Systems Operator for Northern Ireland
AONB	Areas of Outstanding Natural Beauty	NMD	Newry, Mourne and Down	SPPS	Strategic Planning Policy Statement
ATC	Area of Townscape Character	NMDDC	Newry Mourne and Down District Council	SuDS	Sustainable Drainage System
AVC	Area of Village Character	NPF	National Planning Framework	STN	Strategic Transportation Network
BGS	British Geological Survey	NPFA	National Playing Fields Association	VAT	Value Added Tax
BNMAP	Banbridge/Newry and Mourne Area Plan 2015	PAC	Planning Appeals Commission	4G	Fourth Generation
CA	Conservation Area	PAYE	Pay As You Earn Tax		
DAERA	Department for Agriculture, Environment and Rural Affairs	POP	Preferred Options Paper		
DOE	Department of the Environment	PPSs	Planning Policy Statements		
Dfi	Department for Infrastructure	PSRNI	Planning Strategy for Rural Northern Ireland		
DRD	Department for Regional Development	QPANI	Quarry Products Association for Northern Ireland		
EQIA	Equality Impact Assessment	RDS	Regional Development Strategy 2035		
ha	Hectares	RG	Regional Guidance		
HGI	Housing Growth Indicators	ROC	Renewable Obligation Certificate		
HNA	Housing Needs Assessment	RTS	Regional Transportation Strategy		
LDP	Local Development Plan	SA	Sustainability Appraisal		
LGD	Local Government District	SCAs	Special Countryside Areas		
MOU	Memorandum of Understanding	SCI	Statement of Community Involvement		
NI	Northern Ireland	SEA	Strategic Environmental Assessment		
NIE Networks	Northern Ireland Electricity Networks	SOA	Super Output Areas		
NIHE	Northern Ireland Housing Executive				



St Patrick Monument, Saul



Flagstaff, Newry



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

0300 013 2233 (Council)  
0300 200 7830 (Planning)  
council@nmandd.org  
www.newrymournedown.org

**Oifig an Iúir**  
**Newry Office**  
O'Hagan House  
Monaghan Row  
Newry BT35 8DJ

**Oifig Dhún Pádraig**  
**Downpatrick Office**  
Downshire Civic Centre  
Downshire Estate, Ardglass Road  
Downpatrick BT30 6GQ

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