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

Achoimre Neamhtheicniúil ar an Bhreithmheas Inbhuanaitheachta Sustainability Appraisal — Non Technical Summary June 2025



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

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

Consultation Arrangements

Newry, Mourne and Down District Council is consulting on the Newry, Mourne and Down Local Development Plan 2035, draft Plan Strategy. The consultation period will be carried out over a twelve-week period, commencing on Friday 27 June 2025 and closing at 5pm on Monday 22 September 2025. Please note that representations received after the closing date will not be considered.

Availability of the draft Plan Strategy

A copy of the draft Plan Strategy and all supporting documentation, including the Sustainability Appraisal Report, is available on the Newry, Mourne and Down District Council website: www.newrymournedown.org

The draft Plan Strategy and supporting documents are also available to view in hard copy during office hours, 9am–5pm at the following Council offices:

- Newry Office, Monaghan Row, Newry BT35 8DJ
- Downpatrick Office, Downshire Civic Centre, Ardglass Road, Downpatrick BT30 6GQ

Aim of the Public Consultation

The public consultation on the draft Plan Strategy aims to:

- Encourage full public participation in the Local Development Plan process and to stimulate ongoing interest and involvement in the Plan process
- Promote a sense of ownership of the Local Development Plan
- Facilitate the Independent Examination of the draft Plan Strategy to ensure its soundness
- Provide a robust foundation for work on the Local Policies Plan, the next stage in the Plan process.

How the Council will process your comments

Following the twelve-week consultation period, there will be a further eight-week period to facilitate counter representations.

All representations and counter-representations will be analysed by our Local Development Plan Team, and a Public Consultation Report will be prepared and presented to elected members. This may result in amendments in the draft Plan Strategy, before its formal submission to the Department for Infrastructure, in advance of Independent Examination.

It should be noted that your responses are public documents that will be made available for public inspection and Independent Examination. All responses will therefore be held on a database in accordance with the provisions of the UK GDPR.

Online

Use our online response form at Local Development Plan (www.newrymournedown.org/local-development-plan)

Email

Email us or download the above response form at Local Development Plan (newrymournedown.org) and email it to us at ldp@nmandd.org

Post

Write to us or send in a response form available at Local Development Plan (www.newrymournedown.org/local-development-plan) and post it to the following address:

Local Development Plan Team, Planning Office, Downshire Civic Centre, Ardglass Road, Downpatrick BT30 6GQ.

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1. Purpose and Context of the Sustainability Appraisal Report

The Planning Act¹ requires anyone involved in making or managing Local Development Plans to do so with the aim of 'furthering sustainable development'. It also requires them to check how sustainable their Local Development Plan is.

A Sustainability Appraisal looks at how a Local Development Plan might affect people, the environment and the economy. It includes a 'Strategic Environmental Assessment', which the law also requires². Strategic Environmental Assessment is a way to check how new plans or policies might affect the environment, and to make sure those impacts are considered before any big decisions are made.

The purpose of the Sustainability Appraisal Report is to:

- Look at and explain the main likely impacts of the Local Development Plan and any reasonable alternatives that were also considered
- Give consultees, organisations, community groups and the public a good chance early on to share their opinions on the Sustainability Appraisal carried out so far.

The Sustainability Appraisal is documented in the following reports:

1. The Sustainability Appraisal scoping report

This looks at the current environmental conditions in the area and highlights the main sustainability challenges – 'key sustainability issues'. It sets up a framework to measure how the development plan might perform and explains how the plan will be assessed.

2. <u>The Sustainability Appraisal report.</u>

This introduces the plan and the area it covers, shows how it connects with other policies, and outlines the method used to assess it. The report looks at different plan options, highlights key impacts, and explains how these findings shaped the final plan strategy. It also reviews the combined effects of the plan and describes how progress will be tracked. Supporting details are included in the appendices.

2. The Newry Mourne and Down District Council Local Development Plan

The Local Development Plan 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 will set out the main planning requirements to be met in respect of particular zoned sites and designations.

The purpose of the Local Development Plan is to:

- Apply regional planning policies at the local level
- Inform the general public, communities, statutory authorities, public bodies, developers, representative organisations and other interested parties of the policy framework and land use proposals that will be used to guide development decisions and determine proposals in the district up to 2035,
- Be the primary consideration in the determination of planning applications for the development or use of land.

This allows people to know what to expect in terms of change, and the locations where development will be encouraged.

¹ Planning Act (Northern Ireland) 2011 (Sections 5, 8(6) and 9(7))

² The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004

The Local Development Plan comprises of two development plan documents:

- 1. The Plan Strategy
- 2. The Local Policies Plan

The Plan Strategy will provide the essential planning policy framework for planning decisions and enforcement within the district, taking account of regional policy. It will:

- 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.

The Local Policies Plan forms the second stage of the plan making process. The Local Policies Plan will provide site specific policies and proposals, including settlement limits, land use zonings and environmental designations. The Local Policies Plan will not be brought forward until the Plan Strategy has been adopted.

In addition to the Plan Strategy and Local Policies Plan, the Council may publish other documents such as planning guidance, advice notes and information to assist developers and applicants in the planning process.

The Local Development Plan must also take account of the regional policy context set by the NI Executive and central government Departments. The following regional or local strategies and plans are overarching and form a backdrop to the Local Development Plan. These were also considered in the preparation of the Sustainability Appraisal.

- Building a Better Future: The Investment Strategy for Northern Ireland
- Delivering Resource Efficiency NI Waste Management Strategy
- Ensuring a Sustainable Transport Future 'A New Approach to Regional Transportation'; Regional Strategic Transport Network Transport Plan and Sub Regional Transport Plan;
- Environment Strategy for Northern Ireland Public Discussion Document
- Infrastructure 2050 Draft Investment Strategy for Northern Ireland
- Lifetime Opportunities Government's Anti-Poverty and Social Inclusion Strategy for NI
- [Draft] Marine Plan for Northern Ireland, UK Marine Policy Statement; National Marine Planning Framework
- Northern Ireland Sustainable Development Strategy 'Everyone's Involved';
- A Planning Strategy for Rural Northern Ireland;
- Planning Policy Statements and Supplementary Planning Guidance;
- Programme for Government Framework 2024-2027;
- Regional Development Strategy 2035;
- Strategic Planning Policy Statement;
- Sustainable Water A Long- Term Water Strategy for Northern Ireland 2015-2040;
- Valuing Nature A Biodiversity Strategy for NI 2020, the EU Biodiversity Strategy 2030 and National Biodiversity Action Plan (Ireland)

A wide range of other plans, programmes, policies and strategies were also reviewed in the Sustainability Appraisal. these are documented in the Sustainability Appraisal scoping report.

Newry Mourne and Down District Council shares a land or water boundary with three neighbouring Councils:

- Armagh City, Banbridge and Craigavon Borough Council,
- Lisburn and Castlereagh City Council, and
- Ards and North Down Borough Council.

It also shares a border with two County Councils (Louth and Monaghan).

Newry Mourne and Down has a coastline that connects it to the sea, and its watercourses and rivers systems also lead to the sea. The Local Development Plan should also take into account how it might affect the marine environment.

To deal with issues that affect more than one Council area, Newry Mourne and Down District Council will keep working with nearby councils and the DAERA Marine Division. Together, they will discuss shared challenges and agree the best ways to include them in the Local Development Plan. This teamwork is especially important for meeting goals in the Regional Development Strategy and making sure neighbouring councils' policies work well together.

3. Sustainability Appraisal Scoping

The Council first shared the Sustainability Appraisal scoping report for public and consultee feedback in 2018, along with its Preferred Options Paper. Before the Sustainability Appraisal began, the scoping report was updated to include more recent evidence and to reflect the comments and feedback received during that earlier consultation.

Characteristics of the Area

The social, economic and environmental features of the Plan area have been presented across 14 sustainability topics.

For each topic, the report explains the wider context (such as international and national influences) then provides the latest evidence available. It also looks at what might happen if a new Local Development Plan isn't put in place.

The main sustainability challenges for the district are presented as 'key sustainability issues' for each topic. Table 1 below shows some examples of these.

	Торіс	Examples of Key Sustainability Issues
1. Health and Well-being		 Population trends indicate that the proportion of over 65s and over 85s in the total population will increase.
		 Although many indicators of health are better than average in the district, there are inequalities in health and well-being. Many indicators are significantly worse in the most deprived areas.
		 Although activity rates in the district are higher than the NI average and obesity rates lower than average, there is a need to support and encourage people to take part in physical activity. This could be achieved by making it easier for people to access sports facilities, open space, green infrastructure and walking and cycling routes.
2.	Strengthening Society (Community)	 Some villages have grown and there is a need to make sure local services keep up with the growing population.
		 There are big differences in poverty levels across the council area, with lower-income communities mostly in the west and wealthier areas in the east.

Table 1. Examples of Key Sustainability Issues

		b	People in rural areas can usually reach towns and cities fairly easily, but not everyone in those communities lives close to important ervices.
3.	Housing	le ir	As the population ages and more people live with disabilities or ower mobility, homes need to be designed so they are easy to live n and adapt over time. This helps people stay healthy and ndependent for longer.
		p	There is a high demand for social housing, especially from single beople and small families. That means there is a particular need for nore one- and two-bedroom homes.
		e	Housing in rural areas continues to be important. The Plan needs to enable the right amount of new rural housing and a policy to nanage where and how it's built.
4.	Education and Skills		Although levels of educational achievement are better than average in the district, there are inequalities.
			t is important to help people gain new skills—whether they are vorking, unemployed, or not currently in the workforce.
			Apprenticeships, including higher-level ones, should be encouraged as alternative routes into work.
			Making sure people have digital skills, good internet, and access to echnology is key to learning and closing gaps in opportunity.
5.	Economic Growth	s t	Choosing and setting aside the right land for development helps upport local jobs and regeneration. These areas should be suited o the type of development and should be easy to reach by public ransport or active travel.
			he western and border areas have lower average incomes than he northern part of the district.
			City, town and village centres need support to stay vibrant and attractive -especially after the impacts of COVID-19.
		e	(ilkeel, Warrenpoint, and Ardglass harbours are key to the local economy. Warrenpoint and Newry are also seen as major transport hubs, and good transport links are essential for their success.
		е	ourism could play an important role in boosting the regional conomy, but it is important to grow the sector in a way that still protects the area's natural and cultural attractions.
6.	Material Assets		Jpgrading infrastructure in rural areas would help support communities, services and businesses in the countryside.
		t	Renewable energy should be encouraged, but care must be taken o protect scenic landscapes and avoid negative effects on nearby nomes and the environment.
			he electricity grid needs to be improved to handle more energy generation.
		p	Building a circular economy—where waste is reduced by preventing, reusing, and then recycling—is a key goal in the government's draft environmental strategies.
7.	Physical Resources	S	The ability to source minerals and resources locally should be affeguarded. The minerals industry makes an important contribution to jobs and economy.

	 Certain minerals might only be found in localised areas. The plan needs to consider how mineral development might take place, if a mineral resource is in a sensitive area, or an area that is normally protected.
	 There is a possibility that valuable minerals or precious metals could be present in the district. Licences have been issued to allow the area to be explored, but no deposits have been mined yet.
	 If mineral deposits are found to extend into other council areas, their plans and policies should also be considered.
8. Transport and Accessibility	 The A1 linking Newry with Belfast and Dublin is the only road is a key transport corridor.
	 Car travel is the dominant mode of transportation, even for journeys to work of less than 2km. Many main roads in the district experience traffic congestion.
	 It is important for the Council to consider local transport links to include sustainable and active travel: public transport routes, walking and cycling routes, and greenways. A more connected transport network can help people who don't own a car to more easily get to the places they need to go.
	 Over one fifth of residents travel 20 km or more to their place of work. Facilities like park and ride / park and share can help make it easier for people to travel more sustainably for at least part of their journey.
9. Air	 Poor air quality can reduce life expectancy.
	 The three main sources of air pollutants are road transport, home heating and agricultural practices.
	 If public transport and active travel is made more accessible, it can help people to choose not to travel by car, reducing emissions.
	 Supporting renewable energy in suitable locations can help reduce emissions by reducing dependence on fossil fuels.
10. Climate Change	 The agricultural sector is the largest source of total greenhouse gas emissions in Northern Ireland, followed by transport and then residential.
	 There is a need to increase energy efficiency and reduce emissions of greenhouse gases from transport and development.
	 The Council should support and enable appropriate renewable energy technologies, to increase the diversity of renewable energy supplies across the district.
	 Reuse and retrofitting an existing building has a lower carbon cost than demolition and rebuilding.
	 It is necessary to plan for and consider the predicted effects of climate change, and the sustainability of new development in areas that might be at risk now or in the future.
	 It is important to protect areas which provide natural resilience to the effects of climate change.
11. Water	 Water quality in the district's rivers is significantly lower than the NI average. There is a need to improve water quality in our rivers and lakes, and to prevent contaminants and pollutants reaching the sea.

	 It is predicted that the risk and extent of flooding, particularly coastal flooding, will be increased by climate change. Development should be planned to avoid areas at significant risk from flooding, (now or in the future) and to not increase the flood risk elsewhere.
	 NI Water has identified wastewater treatment works and wastewater network capacity constraints in the district. These may influence the potential for development in some settlements, or parts of settlements.
	 Development in general requires a water supply, therefore can increase demands for sources, treatment and distribution infrastructure. This can be offset by measures to make more efficient use of water.
12. Natural Resources	 There are a significant number of areas designated for their nature conservation value within and adjacent to the district. These areas include the majority of the district's extensive and diverse coastline. The district's natural heritage assets not only maintain and protect biodiversity but also attract many visitors.
	 The coast should be considered in the context of climate change, in that it acts as a natural defence likely to contend with future increased pressure from more frequent storm events, higher sea levels and coastal flooding because of climate change. In this respect, it should be protected from inappropriate development.
	 There are a significant number of local level sites of nature conservation interest but not all of these are connected or near to other sites. The plan could bring forward opportunities to protect and integrate green and blue infrastructure and ecological networks.
13. Landscape	 Newry Mourne and Down includes three Areas of Outstanding Natural Beauty which cover more than half the total area of the district. These landscapes are designated as some of the most important in NI. Some areas are shared with neighbouring Councils, so joint working is important to protect and manage them.
	 The coastline contributes significantly to the district's character and is entirely covered by the three Areas of Outstanding Natural Beauty. The majority of the coast is also designated for its nature conservation value and therefore protection of seascape is also important.
	 The Local Development Plan presents a new opportunity for additional landscape designations to help protect exceptional landscapes and unique amenity value as well as areas of local significance.
14. Historic Environment	 The historic environment and cultural heritage have a role in maintaining and enhancing the sense of place in our settlements and rural locations. This can be supported by building design that recognises local character in both urban and rural locations.
	 Heritage assets are at risk from neglect, decay, development pressures and vacancy. The innovative reuse of existing historic building stock should be promoted and supported as a sustainable approach.
	 Protecting built heritage assets and recognising their value extends beyond listing statutory designation and enforcement action.

Consideration should be given to the setting of those features, along with the scale and context of surrounding buildings.
 Non-designated buildings which are of heritage or architectural importance in the context of overall landscape, townscape or heritage value should be recognised for their role in conserving these settings.
 Traffic, air pollution, and noise can have negative effects on historic buildings and heritage sites.

What Might Happen Without the Local Development Plan

The Sustainability Appraisal looks at what could happen if no new Local Development Plan is made, to help understand the possible future without the plan. The existing development plans that apply to the district are:

- Down Area Plan 2015
- Banbridge, Newry and Mourne Area Plan 2015

These Plans were prepared a long time ago and do not reflect the new Council, nor do they take in to account the Community Plan 'Living Well Together'.

In the absence of a new Local Development Plan, there is a risk that development will not reflect today's needs or support delivery of the Community Plan, the Council's Corporate Plan and other relevant Plans, Policies and Strategies. There may be a higher risk of inappropriate development occurring in parts of the district. Opportunities may be missed to deliver more sustainable development and protect, conserve or enhance local sites of particular importance.

Sustainability Objectives

The sustainability objectives were created during the scoping stage and provide the framework for the Sustainability Appraisal.

The Sustainability Objectives are:

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

4. Appraisal of Preferred Options Paper

The first phase of the Local Development Plan took place in 2018 when the Council published a Preferred Options Paper. The purpose of the Preferred Options Paper was to stimulate debate and encourage feedback to inform the development of the Local Development Plan.

A Sustainability Appraisal was carried out for the options in the Preferred Options Paper, and an interim report was published for public feedback at the same time. The Council has used comments received on the preferred options paper and the Sustainability Appraisal interim report to update the evidence that helped shape the Sustainability Appraisal of the draft Plan Strategy

The Appraisal of Strategic Alternatives

'Reasonable Alternatives' are the different realistic options available to a Council for delivering the Objectives of its Local Development Plan. They should also be consistent with other aspects of the plan as well higher-level plans and policies.

Several of the strategic options and alternatives for policy were appraised in the Sustainability Appraisal Interim Report at the Preferred Options Paper stage. Therefore, for many of the strategic policies in the draft Plan Strategy, it was not necessary to look at reasonable alternatives. Strategic alternatives that were appraised for the draft Plan Strategy included the approach for the allocation of land for economic development (industrial/economic development uses) (2 options) and the policy approach for conserving the natural character and landscape of the undeveloped coast (2 options).

5. Appraisal of Draft Plan Strategy

Assessment of Alternative Options

The Local Development Plan Vision and plan objectives, the Spatial Growth Strategy and Strategic Policies and the operational policies in the draft Plan Strategy were appraised for their significant effects. Other than the two alternatives noted above, no reasonable alternative was identified for most of the policy options. This most common reasons for this were:

- The option is required to uphold the aims of current legislation, regulations, or directives;
- The option is required to uphold the aims or policy approach of regional planning policy or the regional development strategy, or other regional or local plans or strategies;
- The Interim Sustainability Appraisal had already established that the option was the most sustainable option or the only realistic option.

Each option was assessed against the sustainability framework to ensure consistency in the approach. Where options work together to deliver the same overall objective, they were appraised collectively as a group.

A summary of the potential effects of the draft Plan Strategy, for each Sustainability Objective, is provided in Section 4 of the SA Report and an overview of the total effects of the draft Plan Strategy is presented in Table 2. This also includes 'potential Secondary, Synergistic or Cumulative Effects' which describes how the objectives may support each other, for example providing good quality housing contributes to health and well-being and supports other plans such as the Community Plan.

SA Objective	Effect of draft Plan preferred options (total effects)	Potential Secondary, Synergistic or Cumulative Effects
1. Improve health and well-being	The provision of high quality, attractive, energy- efficient residential development in sustainable locations supported by urban design which focuses on amenity, safety and internal permeability will help establish attractive living and working environments that benefit the health and well-being of the district's population. Enabling a diversity of employment in appropriate locations whilst preserving the important amenity value of the district's landscapes and coastline will also deliver positive effects on quality of life. The total effect is significant positive.	The approach to ensuring that cycling and walking are viable and attractive travel choices where new development in settlements is proposed, in conjunction with future Local Transport Plans and Council's Active Travel Masterplan that will work to deliver improvements in walking/cycling infrastructure, may provide wider benefits to people's health from increased physical activity and reducing transport emissions. The cumulative effect of the relevant policies working together, along with the Community Plan is to strengthen the significant positive impact.
2. Strengthen society	Defining and outlining settlements rather than encouraging dispersed development throughout the district creates focal points for communities and sustains the services and facilities that make each settlement distinct. Focusing the majority of housing growth toward two principal hubs and the local and small towns enables a wide range of housing options to be delivered and aims to maximise positive outcomes for society. A sustainable population in villages, small settlements and the rural community will be maintained, helping to support local services and conserve local identity. Strategic Policy SP2 and supporting operational policies which encourage high-quality design, active frontages and natural surveillance with new development will contribute towards perceived safety and community cohesion. Improved 'accessibility for all' will benefit everyone in society and reduce inequality. Protecting community facilities, and providing for publicly accessible areas of open space, play areas and sports facilities create shared spaces for community interaction. The total effect is significant positive .	Housing policies HOU5 and HOU6 make provision for affordable housing and a more diverse housing mix. It will encourage people from different community and income backgrounds to live together and should help to support sustainable communities. The cumulative effect of all the relevant policies working together, along with the Council's Regeneration and Economic Development Strategy and the Community Plan, is to strengthen the significant positive impact.
3. Provide good quality sustainable housing	The preferred options for new housing and accommodation create the conditions for a variety of household types and sizes to be delivered, including a minimum proportion of affordable housing. They are aimed at securing current and projected future household requirements in the district. The provision of high quality, attractive and sustainable homes, accommodation and facilities in settlements which meet the specific and locally-identified needs of the population and that are designed to be adaptable and accessible has a significant positive effect.	The principles of placemaking and good design help to enhance the quality of housing on a wider basis, by making the district a more attractive place to live. Policy on creating an accessible environment will help shape and enhance the design of residential areas and will support the delivery of housing that can realistically function as 'lifetime homes'. This will become increasingly important in the context of an ageing population. These policies have a synergistic effect on health and well-being and strengthening society and will help strengthen the effect of those positive effects. There are also synergies with economic development, and accessibility to a local workforce.

Table 2. Cumulative Impacts of the Plan

SA Objective	Effect of draft Plan preferred options (total effects)	Potential Secondary, Synergistic or Cumulative Effects
		The cumulative effect is to strengthen the significant positive effect.
4. Enable access to high quality education	The Housing Strategy aims to maintain sustainable populations in urban and rural settlements. This helps avoid disproportionately impacting access to school places. While the Local Development Plan is not the main mechanism for delivering access to education, many of the policies make a positive contribution to this objective. Effects are largely indirect and delivered through linkages with employment or by improving the locational accessibility to education and skills training providers. The total effect is negligible .	The Local Development Plan will support the delivery of education facilities identified through Education Authority Area Plans, and community facilities. It may also help to support the Council's Regeneration and Economic Development Strategy in establishing increased integration between education providers and industry. Synergistic effects may also emerge through funding from the Belfast Region City Deal. There are synergies between sustainable economic growth, health, transport and accessibility and a stronger society. These cumulative effects work together to raise the effect on the objective from negligible to minor positive.
5. Enable sustainable economic growth	Providing the conditions for the creation of a range of job types that are accessible across the district, including to rural areas, has significant positive impacts on enabling sustainable economic growth. The 'city and town centre first' approach encourages vitality and vibrancy and growth in city and town centres. Identifying and actively promoting the SELs and the benefits of their strategic locations/benefits aims to propel spinoffs in other economic sectors through having more people working in and around the two principal hubs. The approach also recognises the district's attractiveness and the importance of the landscape and coast in sustaining the rural economy. The total effect is significant positive .	The adoption of a Local Development Plan which directs certain types of development to centres or zonings which are located in areas with favourable infrastructure and access to the strategic transport network, including the gateway Port at Warrenpoint is a key aspect of delivering on the RDS. There are significant crossborder interactions in the Drogheda-Dundalk-Newry settlement network (in the context of the Dublin-Belfast economic corridor) identified in the Project Ireland 2040 National Planning Framework, reflecting Newry's role as a Regional Gateway in the Regional Development Strategy. The policies can also help to deliver on the aims and objectives of the Council's Regeneration and Economic Development Strategy and strengthen the economic base. It can also support the objectives of the Council's Tourism Strategy. The preferred options should also help support the delivery of the emerging Green Growth Strategy and Circular Economy Strategic Framework and can be strengthened by projects delivered through the Belfast Region City Deal. They also support expansion and diversification of the marine industries at the key port and fishing harbours, in conjunction with the emerging Marine Plan. All policies in the draft Plan Strategy work together and cumulatively with wider regional plans and strategies to strengthen the effect of the
6. Manage material assets sustainably	Sustainable economic and housing growth has positive effects through facilitating efficient provision of material assets (e.g. waste collection and recycling services, energy generation and energy transmission, telecommunications and other public utilities, etc.). Introducing policy to encourage the incorporation of renewable energy technology and energy efficiency measures including micro-generation and passive solar design into new development and to require a proportion	significant positive impact. The adoption of a Local Development Plan which will identify the areas where growth is projected and which manages growth sustainably will help to coordinate the provision of new/upgraded infrastructure. The approach will also help facilitate the provision of waste facilities that support the NI Waste Management Strategy: 'Delivering Resource Efficiency'. It will support wider regional strategies such as the emerging Circular Economy Strategic Framework and 'Zero Waste' ambitions.

SA Objective	Effect of draft Plan preferred options (total	Potential Secondary, Synergistic or Cumulative
7. Protect physical resources and use sustainably	effects) of on-site generation for major development will help achieve greater energy and resource efficiency. Policy to protect areas of exceptional landscape quality and international sites of nature conservation importance may present challenges in the delivery of some types of renewables and energy infrastructure development. However, it should not preclude the delivery of essential assets and diversity of energy supply. The total effect is mixed/uncertain . Growth and development will lead to an inevitable consumption of land, however the strategic approach aims to concentrate and contain development, in preference to expansion. It promotes efficient use of the land resource and sustainable patterns of development. The preferred options seek to protect areas of exceptional landscape quality and international sites of nature conservation importance. While policy may create additional challenges in the exploration and extraction of minerals in the location of the areas protected, it will also benefit the objective by protecting the semi- natural land resource. The total effect is minor positive .	Effects The incorporation of renewable/low carbon energy technologies in new development will help support the 'do more with less' approach of the emerging Energy Strategy. The Local Development Plan would be able to facilitate essential infrastructure required to support regional targets for decarbonisation, as promoted by the Energy Strategy and emerging Green Growth Strategy. Forward planning and coordination between service providers will help to reduce capital costs. Cumulatively the positive effects would be strengthened, raising the overall effect to minor positive. While the purpose of phasing the release of housing supply is not to protect land as a resource, it will indirectly serve to do so. Strategic and operational policy encourages the reuse of existing buildings and the redevelopment of brownfield sites to reduce the uptake of greenfield land. Updated Urban Capacity Studies will help to inform the baseline at the LPP stage. Clustering development in the countryside and encouraging the retention of natural boundaries and mature vegetation helps to ensure that land is as efficient as it can be and that the development of greenfield land is kept to minimum levels, reducing uncertainty and helping to mitigate some of the negative effects. Policies which support sustainable minerals extraction can have an indirect positive impact on jobs and economic growth, including through the supply chain and equipment sectors. The cumulative effects will strengthen the minor
8. Encourage active and sustainable travel	The principle of spatial planning which establishes focal points or areas for similar land uses creates the conditions to allow walking and cycling, or public transport routes to be established between residential areas, employment areas and open space areas for leisure/recreation. General policy for all development aims to create an accessible environment focusing on connectivity and safety and the place-making accessibility and connectivity; this strategic approach acts positively for achieving the objective. However, many of the parts of the district are not well served or accessible by public transport and, although the preferred options will control development in the countryside, new development will continue to occur in rural areas where these opportunities will not be present and these aspects have a negative effect. The total effect is mixed/uncertain .	The adoption of a new Local Development Plan which will identify the areas where housing and employment growth is projected helps to inform future local and regional Transport Plans and will allow service providers to plan for the future more effectively. National policy for transitioning to electric vehicles will not alleviate congestion. The approach to ensuring that new development in settlements is accessible by active travel will work in conjunction with the measures identified in the Dfl's Local Transport Study to encourage active travel and discourage car use. Such measures include improved provision of routes/options and the implementation of parking strategies to improve modal choice and encourage behavioural change to reduce reliance on cars, particularly for short, local journeys. It will also support the aims of regional plans such as 'Ensuring a Sustainable Transport Future' to enhance regional public transport connectivity. Positive secondary effects may occur on health and well-being.

SA Objective	Effect of draft Plan preferred options (total effects)	Potential Secondary, Synergistic or Cumulative Effects
		The cumulative effects will move the balance of the mixed/uncertain effect to a minor positive effect.
9. Improve air quality	Growth and new development, particularly housing and economic development, is likely to generate emissions and have indirect effects from an increase in associated transport emissions. While baseline air quality is generally good, there are two AQMAs in Newry City and the district's population has a high reliance on cars / private transport. Policy for residential and economic development in settlements encourages and supports accessing active and sustainable travel, potentially reducing reliance on the car. This is much less feasible outside settlements. The preferred options promote and encourage energy efficiency and design that incorporates low-carbon and renewable heating and power sources, however it will only be compulsory for major development to include these technologies. Behavioural change will be a key influence in reducing emissions. The total effect is mixed/uncertain .	All policies work together to cumulatively reduce the scale of negative impacts and enhance positive impacts. The preferred options promote the creation of an accessible environment in settlements, with movement patterns that support walking and cycling and ease of access to public transport. This may help to initiate behavioural change to reduce reliance on cars as the preferred mode of transport in settlements, especially for short journeys under 2km. While the preferred options require energy efficient design and incorporation of renewable and low carbon energy technologies in new development where feasible, incentives to improve the performance of existing development delivered through regional policy such as the Energy Strategy and 'Net Zero' commitments are more likely to make perceptible reductions in emissions from combustion for heat and energy, and from transport. Positive secondary effects may occur on health and well-being, biodiversity and climate change. While the Local Development Plan may help to create conditions which could reduce aerial emissions and improve air quality, the greatest influences on reducing emissions are beyond the scope of the Local Development Plan, and consequently the long term impact remains uncertain .
10.Reduce causes of and adapt to climate change	The strategic approach promotes the re-use of existing buildings in preference to new development and aims for more compact, efficient settlement layouts. The preferred options for quality and design aim to increase opportunities for accessing employment and services by active or sustainable travel and reducing reliance on the car. However, the preferred options also facilitate new development - housing, transport, facilities/services, industry/business, and agriculture – which can be sources of greenhouse gas emissions. Emissions can be reduced or offset through the incorporation of low-carbon and renewable technologies, as is encouraged under SP1 and the underpinning operational policies, however the options are unlikely to make much difference to the embodied carbon cost of new development. The preferred options will ensure that development in areas vulnerable to the effects of climate change is avoided. The approach is also flexible and can respond to an evolving baseline. The total effect is mixed/uncertain .	All the preferred options in the draft Plan Strategy work together to cumulatively reduce the scale of negative impacts and enhance positive impacts. Policies that protect areas of exceptional landscape quality and sites of nature conservation importance will indirectly protect land and habitat that has a role in mitigating and/or adapting to the effects of climate change, such as beaches and dunes, raised and blanket bogs, wetlands and flood plains. There is an overlap with some of the aims/objectives of the FRMP, RBMP, draft Marine Plan and NICCAP 2. While the preferred options promote energy efficient design and incorporation of renewable and low carbon energy technologies in new development and biodiversity net gain, where feasible, behavioural change and improvement in the performance of existing development is required. Increasing the extent of habitats that remove carbon from the atmosphere will also be required. These are more likely to be delivered through regional policy such as the Energy Strategy and 'Net Zero' commitments, and the emerging Environment Strategy. The greatest influences on reducing greenhouse gas emissions are beyond the scope of the Local

SA Objective	Effect of draft Plan preferred options (total effects)	Potential Secondary, Synergistic or Cumulative Effects
		Development Plan, and consequently the long- term impact remains uncertain .
11.Protect, manage and use water resources sustainably	Growth may place pressure on water resources through wastewater and storm water discharges. Impermeable surfaces such as roofs and parking areas can contribute to increased runoff rates and influence flooding which is a key issue in many parts of the district. Foul wastewater requires treatment prior to discharge. Directing new residential and economic development in accordance with the spatial strategy and settlement hierarchy will encourage development to be located in settlements where water and wastewater infrastructure is already present and is generally able to accommodate the new development, while meeting the required treatment standards. However there are known issues with waste water network and treatment capacity in some settlements, or parts of settlements in the district. The incorporation of SuDS, where possible, in all new development will help control and manage runoff and surface water at source. River corridors will receive protection to conserve natural bankside morphology and natural flooding regimes. Housing and non-residential development in the countryside has a greater tendency to be reliant on private treatment. While new development will not be permitted to proceed to proceed where it would create or add to a pollution problem, the long term operation / maintenance of private waste water treatment systems such as septic tanks is outside the scope of the Local Development Plan. The total effect is mixed/uncertain .	The adoption of a Local Development Plan which will identify the areas where growth is projected and which manages spatial growth sustainably will help to inform the investment in and co-ordination of water supply and waste water infrastructure upgrades (where necessary). While the NI Water PC21 business plan indicates that several price controls will be required to rectify the problem of development constraints regionally, Newry and Downpatrick are scheduled to receive investment in the PC21 period to help address 'serious development restriction'. The requirement to carry out drainage assessments for applicable development will help to ensure that source control is given greater consideration from the earliest stages of design and accords with the actions identified in Sustainable Water - A Long-Term Water Strategy for NI. It may encourage 'soft' SuDS (which delivers multiple benefits) to be more widely employed, The preferred options also accord with the aims of the Flood Risk Management Plan and River Basin Management Plan, and may help alleviate pressure on drainage networks. Cumulatively these actions may help to address some of the water quality issues in receiving waters, including the marine waterbodies of Carlingford and Strangford Loughs and Dundrum Bay which are not achieving 'good' status under the Water Framework Directive Regulations. The cumulative effects will move the balance of the mixed/uncertain effect to a minor positive effect.
12.Protect natural resources and enhance biodiversity	Development and growth is likely to result in pressure on greenfield sites and a degree of local biodiversity loss. Promoting the re-use of existing buildings in preference to new development and strategically directing the majority of new development to within settlements (and specifically inside defined settlement limits and zonings which take natural resources into consideration) helps to support this objective. However, much of the undeveloped zoned land is greenfield land and its eventual use is likely to result in loss of biodiversity. General policy for all development requiring the identification of measures to achieve biodiversity net gain in the design process will help to reduce this impact. Many of the district's areas designated for their nature conservation importance are aquatic, marine or otherwise water-dependent and effects from development may occur at a	Policy to protect coastal European and Ramsar Sites from significant effects will indirectly benefit the wider marine area. Where there is the potential for impacts on the marine area, consultation and liaison with DAERA (and, in shared waters, the DHPLG) will inform whether there is a requirement for a Marine License or other permitting that requires a joint authority approach. A review of the evidence base and identification of Key Site Requirements in the identification/review of zonings at LPP stage may complement or help to deliver objectives of the Council's Local Biodiversity Plan, or the regional Biodiversity Strategy and the All-Ireland Pollinator Plan. These elements will work cumulatively to support the preservation and enhancement of local biodiversity. The preferred options also include policy on open space and on green and blue infrastructure, which

SA Objective	Effect of draft Plan preferred options (total effects)	Potential Secondary, Synergistic or Cumulative Effects
	The preferred options to safeguard natural heritage have been developed in accordance with regional planning policy and statutory legislative requirements. The policies to protect the landscape, provide open space and to prevent pollution of surface or groundwater will work to support this objective. The total effect is minor positive .	fragmentation and, where feasible, to enhance habitat through building and landscape design. This approach can help to deliver multiple benefits including to health and well-being, strengthening society, active and sustainable travel and water resources. These cumulative effects may remove some of the uncertainty and help strengthen the minor positive impact.
13.Maintain and enhance landscape character	The strategic approach to confine the greatest proportion of growth to existing larger settlements will help to safeguard landscape character. However, there will be a certain proportion of new development in the countryside. Strategic designations for landscape accompanied by policy informed by landscape character assessment will provide direction on what can be accommodated in areas of particular landscape sensitivity. The most exceptional landscapes and the undeveloped coast will receive the strongest policy protection. Strategic policy on design and more specific design policy for development in the countryside seeks to ensure that development in the countryside is sited and appropriately designed to integrate sympathetically with its surroundings and urban sprawl is limited. The total effect is significant positive .	Policies and legislation to protect natural resources and the historic environment also work cumulatively to support this objective. The quality of the landscape in the district is demonstrated by its Geopark status centred around The Mournes, The Ring of Gullion and Strangford Lough and Coast. Liaison with neighbouring Councils and aligning policy where there is potential for cross-boundary effects delivers secondary effects in respect of attracting tourism/visitors. These cumulative effects help strengthen the significant positive effect.
14.Protect, conserve and enhance the historic environment and cultural heritage	Development has the potential to conflict with the historic environment - including damage to, or destruction of, undiscovered buried archaeology. The preferred options in the draft Plan Strategy are protective towards identified / designated assets, in accordance with statutory requirements and legislation. Policy will also help to ensure that where there is a risk of buried archaeology being damaged or disturbed by new development, this can be avoided through archaeological assessment and evaluation. Strategic policy on design and more specific design policy aims to deliver new development that is not only integrated with its surroundings but that creates a sense of place based on a clear understanding of the site context. The re- use of existing buildings is promoted and encouraged in preference to new development. The preferred options are protective of non- listed vernacular and locally important assets of heritage value and provide direction on the sensitive conversion and reuse of these assets. The strategic approach may introduce risk of incremental change and cumulative effects on the setting of heritage assets in settlements. The total effect is minor positive .	Policies which protect landscape character and natural heritage work together to strengthen the protection towards the historic environment and the setting of historic features. The Council's Tourism Strategy aims to encourage sustainable tourism by highlighting the UNESCO Global Geopark within its themes of 'Mountains, Myths and Maritime'. The Geopark includes 'People and culture' and 'Archaeology and Built Heritage' among its underpinning themes and has a community-centric focus. Investment in tourism could help to enhance access to and understanding of heritage assets and stimulate heritage-led regeneration. The draft Plan Strategy can also facilitate the delivery of the various Town Centre and regeneration Masterplans and Development Frameworks which could enable the restoration of old buildings, enhance access and deliver new shared spaces for culture, arts and creative industries. These cumulative effects will help to strengthen the minor positive effects to significant positive effects.

Many of the adverse impacts identified have been minimised through the cross-referencing of policies within the draft Plan Strategy. However, the Sustainability Appraisal identified a potentially significant negative effect for one policy option. Mitigation has been included within the draft Plan Strategy which will reduce the impact from this policy options to 'insignificant'.

Therefore, no significant adverse effects are expected to arise as a result of the draft Plan Strategy. Measures to reduce the scale of minor negative effects and to promote positive effects are also described in the Sustainability Appraisal report.

Limitations and Assumptions

During the appraisal of each Option, where possible, effects were predicted. In some cases, it was found that the effect will depend upon the type and scale of development and its location. Many of the proposals affect multiple locations, or locations for which boundaries have not been defined. This can make it difficult to determine at this stage whether overall effects are likely to be negative or positive. These effects may remain uncertain until detailed supplementary planning guidance and/or specific site proposals are known.

Habitats Regulations Assessment

A draft Habitats Regulations Assessment has been published for consultation with the draft Plan Strategy. The draft Habitats Regulations Assessment reports on the assessment of the proposals and policies in the draft Plan Strategy and its potential impacts on European sites and Ramsar sites.

European sites are Special Areas of Conservation and Special Protection Areas which were originally designated under the 'Habitats Directive' and 'Birds Directive' but which are now protected by local legislation following the UK's exit from the EU. Ramsar sites are wetlands of international importance identified under the provisions of the Ramsar Convention. These sites are protected by regional planning policy. Collectively these sites are all referred to as 'European sites'.

A total of 39 European sites that have the potential to be connected to the plan area were identified and examined.

The habitats regulations assessment looked at threats to each European site, its condition and the potential impacts of the draft Plan Strategy proposals. It was found that the draft Plan Strategy could have the potential to affect European sites through one or more of the following impacts:

- Habitat loss;
- Direct and indirect disturbance;
- Introduced species;
- Aerial emissions;
- Water pollution; and
- Hydrological change.

Significant effects could not be entirely ruled out for 37 of the European sites identified, therefore potential impacts on those sites were further assessed through a process called 'appropriate assessment'.

The appropriate assessment found that measures which are considered as mitigation have been included in the draft Plan Strategy. These measures will ensure that adverse effects on the integrity of European sites are avoided.

The assessment has concluded that the draft Plan Strategy will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.

The Habitats Regulations Assessment remains in draft until the Local Development Plan is adopted. Following public consultation and independent examination of the draft Plan Strategy the HRA will be updated and finalised as required, and published alongside the adopted Plan Strategy.

6. Outcome of Appraisal and Next Stages

Outcome of Appraisal

The Sustainability Appraisal process has helped influence the content of the draft Plan Strategy by contributing to the critical review of the policies and policy options including their reasonable alternatives. Through the Sustainability Appraisal process, preferred options for implementing strategic and operational policies were identified. In all cases the preferred option represented the most sustainable option.

Overall, significant positive sustainability effects are predicted to result from the draft Plan Strategy throughout the plan term and beyond, in relation to the sustainability objectives to:

- 1. improve health and well-being.
- 2. strengthen society.
- 3. provide good quality, sustainable housing.
- 5. enable sustainable economic growth.
- 13. maintain and enhance landscape character.
- 14. protect, conserve and enhance the historic environment and cultural heritage.

It should be noted that in the case of the historic environment Sustainability Objective, the total effects have been raised from minor positive to significant positive through the cumulative impact of the plan.

Minor positive effects are identified for the Sustainability Objectives to:

- 4. enable access to high quality education,
- 6. manage material assets sustainably,
- 7. protect physical resources and use sustainably.
- 8. encourage active and sustainable travel.
- 11. protect, manage and use water resources sustainably.
- 12. protect natural resources and enhance biodiversity.

Again, the total effects on these Sustainability Objectives have been enhanced in a positive way through the cumulative impacts brought about by the plan, and cumulative or synergistic effects with other Plans, Programs and Strategies.

The overall effect is uncertain for two of the Sustainability Objectives, the Objectives to:

- 9. improve air quality.
- 10. reduce causes of and adapt to climate change.

The cumulative impact of the Plan on these Objectives is to reduce the range and scale of the minor negative impacts and enhance some of the minor positive effects, but some uncertainties remain. This reflects that a plan for growth is unlikely to improve air quality or reduce greenhouse gas emissions, however it promotes and facilitate energy efficient development and walking and cycling and will support wider initiatives that encourage the behavioural changes required for this to happen.

A significant negative effect was identified for the preferred option for facilitating dwellings in the countryside in respect of the Objective to encourage active and sustainable travel. This option is required to deliver on regional policy and there are no reasonable alternatives.

Mitigation has been identified and is described in section **Error! Reference source not found.**. The m itigation is already included within the Local Development Plan and will reduce the impact from these policy options to minor negative and not significant.

The overall impact of the draft Plan Strategy is a finding of <u>no likely significant effects on the</u> <u>environment</u>.

Measures which will help to reduce negative effects and enhance positive effects of the Local Development Plan include:

- Reviewing sites and zonings using up to date evidence and establishing key site requirements at the local policies plan stage;
- Environmental Impact Assessment or more specific Impact Assessments for qualifying projects will help to identify impacts and will propose mitigation, where it is required; Where necessary, Habitats Regulations Assessment at the project level will ensure that new development does not, on its own or in combination with other development, have a significant effect on the conservation objectives of European and International sites.
- Supplementary design guidance; and
- Supplementary planning guidance.
- Use of appropriate conditions / planning agreements

How has the Sustainability Appraisal influenced Plan Making

The entire plan-making process is one of decisions, change and fine-tuning in response to many factors, including the Sustainability Appraisal. Identifying and clarifying these changes is therefore a key element of the Sustainability Appraisal process as it shows how the plan-making process has been influenced, in particular how the plan has changed and what mitigation measures have been incorporated into the plan.

In summary, the Sustainability Appraisal has influenced the draft Plan Strategy by helped to draw out the interrelationships and cross overs between draft policies and identifying word changes to address potential policy gaps or to provide points of clarification.

Next Steps

The Sustainability Appraisal scoping report and Sustainability Appraisal report have been published alongside the draft Plan Strategy for consultation. Responses to the consultation may lead to the modification of the Plan Strategy. If these modifications are significant, this may lead to additional appraisal against the Sustainability Appraisal framework.

Monitoring

Preliminary indicators for monitoring effects of the Local Development Plan have been identified for the Key Sustainability Issues and significant effects identified through the Sustainability Appraisal. These will be aligned where possible with Local Development Plan and community plan monitoring.

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