

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

Forlíonadh Teicniúla 4 – Miondíol
Meitheamh 2025
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1.0 Introduction

Purpose of this document

- 1.1 The purpose of this technical supplement is to bring together the evidence base that has been used to inform the preparation of Newry Mourne and Down District Council's Local Development Plan (LDP) draft Plan Strategy. It forms one of the subjects based technical supplements that should be read alongside the draft Plan Strategy, to provide justification for the policies proposed therein.
- 1.2 This builds upon LDP Preparatory Paper 4: Town Centres and Opportunity Sites (November 2015) which provides an overview of the retail provision in the Council area and information to help determine the need for a detailed retail strategy and formed part of the evidence base for the Preferred Options Paper (POP) which was published in June 2018.
- 1.3 This technical supplement provides an overview of the regional and local policy context in regard to retail and town centres and provides details of the town centre profiles for the main towns within the district.
- 1.4 A Retail and Commercial Leisure Capacity Study (2020) and supplementary Retail and Commercial Leisure Study (2022) were undertaken on behalf of Newry, Mourne and Down District Council by Nexus Planning. These reports form the evidence base for the draft Plan Strategy and are provided at Appendix 4A and 4B respectively.

Planning and Retailing and Town Centres

- 1.5 While our town centres are a focus for retailing and associated facilities, they are also important hubs for a wide range of other land uses and activities that are important to those who live in, work in and visit them. These can include residential, employment and leisure use.
- 1.6 The retail sector within the Council area, as elsewhere, has been faced with a range of challenges in recent times. Changing consumer and lifestyle trends, the rise in internet shopping and associated 'click and collect' services and competition from out-of-town shopping centres and retail parks have all had a direct impact on retail services located in our town centres.
- 1.7 Given the importance of our town centres as the main hubs of economic and social activity, it is vital that they remain economically competitive and vibrant. The planning system can support the diversification of uses within our town centres, through the promotion of established town centres as the most appropriate choice for retail and other complimentary town centre functions.

2.0 Policy Context

Regional Policy Context

NI Executive Draft Programme for Government 2024-2027 Our 'Doing What Matters Most'

- 2.1 The Programme for Government (PfG) sets out key priorities of the Northern Ireland Executive which includes growing a globally competitive and sustainable economy. The document highlights the need the right infrastructure which will create the foundations for a more productive and prosperous economy; for better rural and urban communities; and for healthier and greener lives.
- 2.2 Successful retail and leisure sectors will contribute to a more productive and prosperous economy.

Regional Development Strategy 2035 (RDS)

- 2.3 The RDS is a spatial strategy which provides an important planning framework for tackling the deficiencies in our infrastructure and helping the overall development of our economy and society. It provides regional guidance and spatial framework guidance.
- 2.4 Regional Guideline 1 (RG1) seeks to ensure adequate supply of land to facilitate sustainable economic growth. Whilst the focus is on industrial and business uses, it does refer to the importance of strengthening the larger urban centres and regional gateways, to take advantage of their locations on the regional transport network.
- 2.5 Regional Guideline 7 (RG7) in supporting urban and rural renaissance, places importance on 'Developing innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development'. The RDS recognises the importance of accessible, vibrant town centres which offer people more local choice for shopping, social activity and recreation.
- 2.6 The RDS identifies Newry as a 'Main Hub' and as the Southeastern City Gateway with the Republic of Ireland. Downpatrick is also identified as a 'Main Hub'. The two centres of these two 'Main Hubs' should be developed as the major locations providing employment, services and a range of cultural and leisure amenities.
- 2.7 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.

Strategic Planning Policy Statement (SPPS)

- 2.8 The SPPS, published in 2015, sets out the core principles which underpin the two-tier planning system, including 'supporting sustainable economic growth'. The aim of the SPPS is to support and sustain vibrant town centres across Northern Ireland, through the promotion of established town centres as the appropriate first choice location for retailing and other complimentary functions, consistent with the RDS. The SPPS outlines the importance of adopting a variety of uses, good urban design and accessibility within the town centre.
- 2.9 The SPPS (Town Centres and Retailing, Paras 6.267-6.292) states that local development plans should define a network and hierarchy of centres and sets out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations. In the smaller tier centres, policies and proposals for shops must be consistent with the aim, objectives and policy approach for town centres and retailing, meet local need and be of a scale, nature and design appropriate to the character of the settlement. Whilst inappropriate retail development in the countryside is generally resisted, the SPPS allows limited exceptions for farm shops, craft shops and shops serving tourists or recreational facilities.
- 2.10 In preparing Local Development Plans, the SPPS requires Councils to undertake an assessment of the need or capacity for retail and other main town centre uses across the plan area. A key element in developing the evidence base will be the preparation of Town Centre Health Checks. The SPPS also requires Councils to undertake and regularly update these (at least once every five years). They will contain information on a range of indicators, including:
- existing town centre uses
 - vacancy rates
 - physical structure and environmental quality – including opportunities, designations and constraints
 - footfall
 - retailer representations
 - attitudes and perceptions
 - prime rental values; and
 - commercial yields.

Planning Policy Statements and Supplementary Guidance

- 2.11 Planning Policy Statement 5: 'Retailing and Town Centres' (1996) set out an objective of sustaining and enhancing the vitality and viability of town centres. It provided the regional policy for retailing and town centres but was withdrawn and replaced by strategic policy contained in the SPPS, as outlined above.

- 2.12 Planning Policy Statement 6: 'Archaeology and Built Heritage' sets out policies to protect buildings, archaeological features and remains and areas of historical or architectural importance, such as Conservation Areas. As most town centres are developed around a historic core, development proposals often raise conservation issues.

Supplementary Planning Guidance

- 2.13 Supplementary Planning Guidance includes 'Living Places: An Urban Stewardship and Design Guide for NI' (2014). This sets out the key principles behind good place making, which is often of particular importance in town centres.

Local Policy Context

Existing Area Plans

- 2.14 The existing Development Plans that apply to Newry, Mourne and Down District Council are:
- Banbridge/Newry and Mourne Area Plan 2015 (adopted 2013)
 - Ards and Down Area Plan 2015 (adopted 2009)
- 2.15 These Plans provide the policy framework against which to assess development proposals.

Banbridge/Newry and Mourne Area Plan 2015

- 2.16 The Banbridge/Newry and Mourne Area Plan's Plan Strategy includes identifying, defining, designating and safeguarding specific areas where the retention of, or provision of, additional retail, services, recreational and other community facilities will positively contribute to the amenity and wellbeing of the population.
- 2.17 The Plan identifies Newry's function as the major centre for housing, employment, retail and professional services. Its city centre commercial provision is reinforced by the Quays and Buttercrane shopping centres, while the edge-of-town Damolly Retail Park is an outlet for bulkier goods. The other towns, villages and smaller settlements throughout the Plan Area provide a range and variety of local and specialist retail and service facilities for their immediate areas.
- 2.18 The Plan recognises that bars, cafes and restaurants have an important role complementing the primary shopping function of city and town centres and contributing to tourism and the evening economy. Town centre housing also has an important role both in terms of vitality of a city/town centre and offering a sense of security.

Newry

- 2.19 A city centre boundary together with primary retail core and frontage have been designated in Newry to ensure the continuance of a compact and attractive shopping environment, offering both choice and convenience. The Newry Conservation Area covers all the primary retail core and additional lands to the west (Abbey Way) and north (Trevor Hill, Sugarhouse Quay and New Street).
- 2.20 The city centre boundary extends north to the largely office area of the Downshire Road and the commercial/industrial area north of Upper Edward Street and Cecil Street, west to the campus of the Southern Regional College and neighbouring business, and south to the Quays shopping complex and major brownfield development opportunity sites at the Albert Basin and Warrenpoint Road.
- 2.21 The primary retail core centres around Hill Street, John Mitchel Place, Merchant's Quay and the upper part of Monaghan Street, together with Buttercrane and The Quays shopping centres.
- 2.22 A primary retail frontage is designated along both sides of Hill Street. This is to retain the focus of retail use and ensure the maintenance of a compact shopping environment.
- 2.23 The Plan also contains a policy on town centre housing. It is acknowledged that specific housing areas provide valuable housing stock and are homes for established communities which contribute to the variety and vitality of life in the city centre. Accordingly, there is a policy restricting change of use to non-residential uses. In addition, proposals for new housing on derelict or backland sites and re-use of upper floors for residential use can help support variety and vitality within the city centre.

Crossmaglen

- 2.24 The largest town in South Armagh, Crossmaglen has developed around a large market square (Cardinal O'Fiaich). More recently the focus of commercial activity has moved from the square to North Street. There are opportunities for retail activity within the town centre in particular around Cardinal O Fiaich Square and along Newry Street where there are vacant and underutilised units.
- 2.25 A town centre boundary is designated for Crossmaglen. This includes Cardinal O Fiaich Square, North Street leading to No. 7 Blaney Rd, Newry Street as far as No.26 and Cullaville Rd to the PSNI station. An Area of Townscape Character is also designated, which incorporates most of the town centre apart from the PSNI station, Crossmaglen Enterprise Centre and the Health Centre.

Warrenpoint

- 2.26 A town centre boundary is designated for Warrenpoint. It includes Charlotte Street and Church Street between the PSNI Station and the Church of Ireland and on the opposite side between the Square and Great Georges Street (South). It also includes the Square and Dock Street. An Area of Townscape Character is also designated and incorporates the town centre and seafront.

Newtownhamilton

- 2.27 Newtownhamilton is designated as a town within the Plan, despite its smaller population and lower service and facility provision in comparison with other towns across the district.
- 2.28 A town centre boundary is designated for Newtownhamilton. It includes part of Armagh Street and Dundalk Street, Shamble Lane, the Common and part of Newry Road.

Kilkeel

- 2.29 A town centre boundary is designated for Kilkeel. It includes part of Newry Street and Greencastle Street, part of Harbour Road adjacent to the square and Newcastle Street.

Ards and Down Area Plan 2015

- 2.30 The Ards and Down Area Plan's Plan Strategy includes identifying, defining and safeguarding specific areas (as appropriate) where the retention of, or provision of additional retail, services, leisure and other community facilities will positively contribute to the amenity and wellbeing of the Plan area population, subject to prevailing regional planning policy.

Downpatrick

- 2.31 The plan identifies Downpatrick as the major centre for housing, employment, retail, professional services and for cultural activities, including sport and leisure. It is the main administrative and service centre for the Down District and provides a wide range of retail facilities.
- 2.32 The focal point of the town centre is Breen's Corner, with a number of streets extending out in a radial pattern from this point. Market Street extends to the southwest, English Street which runs westwards to the Holy Trinity Cathedral and Irish Street which runs southeast towards St Patricks Church. Church Street which extends to the north of Breen's Corner, St Patrick's Avenue and part of Steam Street are also included within the town centre boundary. The Conservation area runs in an arc along English Street, Irish Street and Stream Street and is anchored at three points by the town's key ecclesiastical buildings.

- 2.33 The primary retail core is linear in shape, comprising mainly of shops in Market Street, but also includes stretches of Irish Street, Scotch Street, English Street and St Patrick's Avenue. The retail core is short and compact with few breaks in the frontages. The Down Retail Park on the Ballydugan Road is considered too remote to be included within the primary retail core.
- 2.34 There are a number of established residential communities within the town centre, and these are designated protected housing in the plan. As well as contributing to the variety and vitality of the town centre, housing can also assist in securing the refurbishment and reuse of buildings of architectural and historic interest and importance. The town centre housing areas also contain listed buildings at 73 Irish Street, 9 & 10 The Green, Irish Street and 14-24 Saul Street.

Ballynahinch

- 2.35 The town centre includes Main Street, High Street, Dromore Street, Harmony Road and part of Lisburn Street, Church Street and Windmill Street. The primary retail core is focused on Main Street and High Street including the square and a portion of Windmill Street and Dromore Street. The commercial uses in the town are concentrated in the core area and comprise a mix of shops, chemists, cafes, service uses, bars and small business/office uses.
- 2.36 Town centre housing on parts of Church Street provide a valuable housing stock which contributes to the variety and vitality of the town centre. These are designated in the plan and subsequently afford protection against non-residential development proposals.

Newcastle

- 2.37 The town centre boundary extends in a linear form from Railway Street and Donard Street at its northern limit, along the full extent of both Main Street and Central Promenade to the northern side of the Bryansford Road. Main Street runs parallel to the seafront separating the promenade from the main residential area to the west of the town centre.
- 2.38 Newcastle's retail area is dispersed along Main Street into two pockets of independent shops and commercial uses. A primary retail core is drawn to consolidate those areas considered to be the core areas of retail activity.
- 2.39 In addition, the plan contains a policy on Amusement Arcades. Amusement Arcades are a traditional recreational and commercial use often found in established seaside resorts, such as Newcastle. They can interrupt the cohesion of the retail frontage particularly if dispersed along the street frontage. In Newcastle's case, Amusement Arcades have clustered along the central promenade. Accordingly, the plan has sought to retain this focus through the designation of an area reserved for Amusement Arcades. This area extends south from the Shimna River along the Central Promenade.

- 2.40 As previously indicated, the Plan seeks to protect town centre housing through restricting the change of use in certain area. Within the Newcastle town centre, Valentia Place and Donard Place provide an opportunity to contribute to the variety and vitality of life in the town centre and the plan seeks to restrict the spread of commercial uses into these housing areas.

Newry, Mourne and Down District Council Corporate Plan 2024-2027

- 2.41 The Corporate Plan sets out the Council's vision, mission and values. In preparing for the Corporate Plan 2024-2027, the Council has sought to contribute to achieving the outcomes set out within the Community Plan.
- 2.42 The performance of the Council to date has allowed new corporate objectives, supporting actions and measures of success to be identified within this document. The corporate priorities include:
- Invest in and support new and growing business, job creation and employment skills.
 - Continue to improve the health and wellbeing of everyone in the district and reduce health inequalities.
 - Enhance, protect and promote our environment.
 - Support sustainable forms of tourism which value our environment and cultural heritage.
 - Enable and support people to engage in inclusive and diverse activities in their communities.
 - Promote the revitalisation of our city, towns, villages and rural communities
 - Provide accessible, high quality and integrated services through continuous improvement.
 - Advocate with others for the benefit of all people of the district.

Newry, Mourne and Down District Council Community Plan 2030 'Living Well Together'

- 2.43 The Community Plan is the overarching strategic plan for integrated planning and delivering of services in Newry Mourne and Down District Council. It provides a framework for the strategies and plans the Council will put in place to contribute towards the outcomes in the community plan and it is based on a detailed analysis of future risks and opportunities for the district.
- 2.44 The vision of our Community Plan is "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".

Newry, Mourne and Down District Council Regional and Economic Development Strategy 2020-2025

- 2.45 In November 2020, the Council launched a new Regeneration and Economic Development Strategy, which set out the Council's plans to revitalise the region over the next five years. This report documents the level of enterprise within the district from 2016-2019, including the number of retail enterprises within the council area.

Business Improvement District (BID)

- 2.46 A Business Improvement District is a local, democratically elected organisation that focuses on delivering specific improvements for local businesses in a defined area. BIDs invest in and deliver projects to improve the local trading environment, drive down business costs and raise the area profile.

Newry BID

- 2.47 Newry BID was successfully voted in for its second term in March 2021. Their three core values are Belong; Invest; Deliver.
- Belong: Newry BID actively encourage their members to get involved, to belong to the organisation and to ultimately benefit from what they can bring to the business.
 - Invest: Newry BID want Newry City to be a place where people want to invest in and to come to live, work and do business.
 - Deliver: Newry BID want to continue to deliver training, advice, grant support, city centre enhancements, one-to-one business support and increased revenue in the local economy.

Belfast Region City Deal

- 2.48 City Deals are packages of funding and decision-making powers negotiated between central government and local authorities. Belfast Region City Deal secures a bespoke package of investment from central government and the BRCD partners of more than £850 million to support the delivery of the shared vision of: "Inclusive economic growth that delivers more and better jobs, a positive impact on the most deprived communities and a balanced spread of benefits across the region".
- 2.49 This Deal will strengthen the region's offer in growth sectors such as life boost tourism and support the regeneration of our region, underpinned by infrastructure developments and investment in skills to connect people to jobs and services.

Cross Boundary Policy Context

- 2.50 In considering the local policy context, it is important to take account of the three neighbouring councils in Northern Ireland and the two in the Republic of

Ireland. The below table offers a short summary of each Council's position with regards to retail and leisure.

Table 1: Cross Boundary Policy Context

Neighbouring Council	Position
<p>Armagh Banbridge Craigavon Borough Council</p>	<p>Published its Preferred Options Paper in March 2018.</p> <p>Key Issue ECN 5: Defining a Hierarchy of Centres. Council's Preferred Option is ECN 5A – Identify a new hierarch of centres within settlements, based upon the current role and function of our centres and identify new centres, where appropriate.</p> <p>Key Issue ECN 6: Protecting and strengthening town centres. Council's Preferred Option ECN 6A – Review and identify Town Centre Boundaries and Primary Retail Cores, where appropriate, accompanied by policy to protect and strengthen town centres.</p> <p>Key Issue ECN 7: Supporting the evening and night-time economy. Council's Preferred Option ECN 7A – Promote town centres as first choice locations for a variety of complementary town centre uses to facilitate growth of the evening and night-time economy.</p>
<p>Ards and North Down Borough Council</p>	<p>Published its Preferred Options Paper in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the Council's preferred options.</p> <p>Key Issue 32: Hierarchy of Centres. Council's Preferred Option 32a – Define a hierarchy of centres based on the preferred settlement hierarchy and the relevant roles and functions of our centres.</p> <p>Key Issue 33: Spatial extent of town centres and retail cores. Councils Preferred Option 33a – Define the spatial extent of Town Centre boundaries and Primary Retail Cores to accommodate the projected need for retail and other main town centre uses.</p> <p>Key Issue 34: Protecting and enhancing diversity of use – Designated Primary Retail Cores. Council's Preferred Option: Option 34C – Designate Primary Retail Cores to be accompanied by policy to allow differing provision of retail and town centre uses based upon locally distinct character.</p>
<p>Lisburn and Castlereagh City Council</p>	<p>Published its Local Development Plan's adopted Plan Strategy in September 2023.</p>

	<p>Plan Objective C outlines those actions the Council will adopt to grow their city and town centres, retailing and other uses within the Council Area.</p> <p>Strategic Policy 14 – Town Centres, Retailing and Other Uses: The Plan will support development proposals that:</p> <ul style="list-style-type: none"> a) promote town centres, retailing and other uses within the City and town centres to enhance their vitality and viability in accordance with their roles and function in the retail hierarchy b) support the role of District and Local Centres. <p>Policies:</p> <ul style="list-style-type: none"> • TC1 Town Centres, Retailing and Other Uses • TC2 Lisburn City Centre Primary Retail Core and Retail Frontage • TC3 Town Centres • TC4 District and Local Centres • TC5 Villages and Small Settlements • TC6 Petrol Filling Stations and Roadside Service Facilities <p>The policies reflect the Plan Objective to grow the city and town centres and promote the retail sector.</p>
Louth County Council	<p>Development Plan was adopted by members in September 2021.</p> <p>The Louth Retail Strategy has been prepared in compliance with the Retail Planning Guidelines.</p> <p>The objectives for Retail are as follows:</p> <ul style="list-style-type: none"> • EE 64: To promote a healthy competitive retail environment within County Louth and to maintain the vitality and viability of the town and village centres and their role as primary retail core areas. • EE 65: To encourage and support the re-use and revitalisation of vacant (and derelict) units and properties within town and village centres and assess change of use applications based on merit and overall contribution to the vitality of the town centre and the day and/or night economy. • EE 66: To ensure that applications for retail development comply with the provisions of the Louth Retail Strategy.

	<ul style="list-style-type: none"> • EE 67: To generally support planning applications which propose complementary, non-retail uses in town centre areas, where sustained levels of vacancy are evident. • EE 68: To promote the core retail area as the primary shopping area and generally discourage nonretail or service developments within this area. • EE69: To generally discourage permission for change of use from retail or service (including banks and similar institutions with over-the-counter services) to non-retail or non-service uses at ground floor level in areas where there is an existing strong retail provision. • EE 70: To support the 'Town Centre First Approach' and the establishment of any future town centre management initiative. • EE 71: To support the establishment of a Louth County Council Town Centre Management Team for Drogheda and Dundalk. • EE 72: To create safe and clean town centre environments which give people confidence to visit centres. • EE 73: To support the development of Drogheda and Dundalk as Regional Growth Centres and principal locations for future retail development, Ardee and Dunleer as Self-Sustaining Growth Centres and the retail function of all other settlements commensurate with locally generated needs. • EE 74: To promote the provision of local retail centres serving small, localised catchment populations in new residential areas, commensurate with locally generated needs.
Monaghan County Council	<p>Prepared Draft Monaghan County Development Plan 2025-2031.</p> <p>The objectives for Retailing are as follows:</p> <ul style="list-style-type: none"> • SRO 1: Protect the vitality and viability of the town centres as the principal shopping area by encouraging development that would maintain and consolidate the retail core (as defined by the town centre boundary) of the towns. • SRO 2: Prohibit the location of retail development outside the town centres unless where it is compliant with the policies as laid out in the Country Monaghan Retail Strategy 2016-

	<p>2022 (and any subsequent strategy), and the DECLG Retail Planning Guidelines for Planning Authorities (and any subsequent guidelines).</p> <ul style="list-style-type: none"> • SRO 3: Encourage the provision of a wider range of convenience and comparison goods and size of retail units in the town centres.
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- 2.49 The Council has engaged and responded to neighbouring Councils POP's and draft Plan Strategies for Louth and Monaghan as they were published. The Council is also represented on a number of working groups to discuss cross-boundary issues, including the Development Plan Working Group.
- 2.50 The draft Plan Strategy was presented to neighbouring councils in a workshop on 9th April, where representatives from the three neighbouring councils in the north were represented. A similar presentation was held online with the two neighbouring councils in Louth and Monaghan Councils on 8 April. This involved discussion on the proposed Plan objectives, Strategic Policies and new operational policies, along with the consideration of shared cross-boundary issues. Further detail is outlined in the Neighbouring Council Consultation Report (see supporting documents to the draft Plan Strategy on the Council's website).
- 2.51 In consideration of neighbouring Council's development plan documents and discussions held with their officials, it is the opinion of this Council that no conflict is apparent with our draft Plan Strategy, insofar as it related to retail.

3.0 Preferred Options Paper

- 3.1 Publication of the Preferred Options Paper (POP) in June 2018 represented the Council's formal commencement of work on the preparation of a new Local Development Plan (LDP) for the district. The purpose of the POP was to stimulate debate and encourage feedback to inform the development of the LDP. The POP set out the proposed vision and strategic objectives for the LDP along with 24 key strategic issues. For each key strategic issue, a range of options were set out and the Council's preferred option identified.
- 3.2 Alongside the publication of the POP, a number of key documents were published including a Sustainability Appraisal Interim Report, Sustainability Appraisal Scoping report (SA) incorporating a Strategic Environmental Assessment (SEA), an Equality Impact Assessment Progress Report (EQIA), and a Preliminary Review of Operational Planning Policy.
- 3.3 The POP document did not include any key strategic issues relating directly to retail/leisure. The Spatial Growth Strategy: Promoting Urban Centres and Supporting Sustainable Rural Development highlights that city and town centres will be supported through retail, office and mixed-use development.

Towns will provide opportunities for smaller economic development proposals, retailing and services and residential development.

- 3.4 Whilst the POP document does not contain a policy review section, a Preliminary Review of Operational Policy document was published alongside the POP. This Preliminary Review gives an indication as to how the Council proposes to take forward the retail policy review to inform its new planning policies within the draft Plan Strategy.
- 3.5 Following the launch of the POP, the Council carried out a public consultation exercise for 12 weeks between 1 June 2018 – 24 August 2018. 14 Public engagement events were held across the district during this consultation period and advertisements were published within the local press.
- 3.6 There were 222 representations received during the POP consultation exercise (6 responses were received outside the consultation period). Of these, 14 were received from statutory bodies.

Responses

- 3.7 Statutory consultees responded to the POP, including DfI Strategic Planning and NIHE.
- 3.8 DfI Strategic Planning provided comment on the economic objectives of the POP, noting the absence of options in relation to retailing and town centres. They noted that any subsequent policies brought forward for town centres and retail development should be consistent with its strategies for growth and also noted that the POP doesn't refer to the linkage between retailing and tourism.
- 3.9 The NIHE suggested that the Council should review the spatial extent and function of existing town centre boundaries and primary retail cores. The Plan should consider the long-term future of town centres in the context of changed shopping patterns, the increase in vacant units and consequent need to diversify uses. NIHE also noted that a retail strategy between Councils is required to address cross-boundary effects.
- 3.10 A public response (planning agent) noted the Council needs to develop a retail strategy and bring forward a retail hierarchy. Changing retail trends should be referenced. The agent highlighted that there should be a re-consultation on the POP following the gathering of retail evidence – not undertaking this could raise concerns around soundness.
- 3.11 General responses to the strategic objectives of the POP included a question over the deliverability of these objectives given the absence of retail information and the limited consideration of the cross-border relationship Newry enjoys with Dundalk (public response).

- 3.12 In recognition of the comments received during the consultation period of the POP, the Council engaged a Retail Consultant (Nexus Planning), to undertake a Retail and Commercial Leisure Needs and Capacity Study. The findings of this have been used to inform future planning policy direction. A summary of this report is included below, and attached, in full, in Appendix 4A.

4.0 District Profile - Retail and Town Centre Profile

- 4.1 This section of the technical supplement is an update of the district profile from Position Paper 4 'Town Centres and Opportunity Sites' published in November 2015, whereby findings from a review of existing town centres in Northern Ireland contained in the 2014 GL Hearn Report, the 2014 Ballynahinch Retail Capacity study produced by Strategic Planning¹ and the South-East Coast Retail Capacity Study published by Roderick MacLean Associates² were noted.

Retail And Commercial Leisure Capacity Study (September 2020)

- 4.2 Nexus Planning were commissioned by Newry Mourne and Down District Council in September 2019 to produce a Retail and Commercial Leisure Capacity Study for the district.
- 4.3 Its key aims were to establish the capacity for retail and commercial leisure development through to 2030, as well as to consider recommendations for future improvements relating to town centre boundaries, and any policy requirements to support the on-going vitality and viability of identified centres.
- 4.4 This study primarily dealt with the eight town centres (as defined within the Preferred Options Paper) within the Council's administrative boundary (Newry City, Downpatrick, Warrenpoint, Newcastle, Kilkeel, Ballynahinch, Newtownhamilton and Crossmaglen), as well as four proposed town centres (Saintfield, Killyleagh, Castlewellan and Bessbrook).
- 4.5 The study was underpinned by empirical evidence in the form of a 900-sample household telephone survey. This survey considered the retail and leisure habits of residents both inside (600 samples) and outside (300 samples) the district. It built an accurate picture of the extent to which the district retains the spending power of its own residents, as well as the extent to which it 'leaks' resident's spending beyond its boundaries, and the extent to which it attracts 'inflows' of spend from elsewhere, including the Republic. The views of stakeholders and the general public were also collated through a

¹ In June 2013 Strategic Planning was commissioned by the Paul Hogarth Company on behalf of the Department for Social Development (DSD) to prepare a Retail Capacity Study for Ballynahinch.

² 5 In July 2011 DSD in partnership with Newry, Mourne and Down District Council commissioned URS Scott Wilson to prepare a Masterplan for the South East Coast. A key component of this was the Retail Capacity Study prepared by sub consultants Roderick Maclean Associates Ltd.

number of workshops and considered in this study. The study also documents findings from a series of town-centre health checks.

Town Centre Health Checks

- 4.6 As part of this report, Nexus analysed the health of each centre under a series of checks specified by the SPPS, as well as understanding market shares and qualitative likes and dislikes deriving from the widespread household telephone survey.
- 4.7 The full details of this original town centre health check can be found in Appendix 4A. The publication of this report coincided with the Covid 19 outbreak in the UK and the initial lockdown.

Retail And Commercial Leisure Study - Supplementary Report (April 2022)

- 4.8 An update to the 2019 report was therefore commissioned by Newry, Mourne and Down in early 2022, and a report was published in April 2022 (see Appendix 4B). This update focused on four specific areas:
 - 1. A consideration of the impact of Covid-19 on the high street and traditional patterns of retail spend, as well as the impact of Brexit and implications for retail and commercial leisure sectors. How can the Council through the LDP support the high street in light of the changing retail environment?
 - 2. Updates to forecasting in the previous study to take account of changes over the intervening period, as well as extending that forecasting to 2035. Updates to be made to:
 - Base population forecasts (Experian base data, updated using NISRA forecasts)
 - Base expenditure forecasts (using the latest Experian Retail Planner Briefing Note); and
 - Review the need for additional convenience and comparison floorspace taking account of already committed development.
 - 3. Updated health-checks for each of the eight town centres (Newry City, Downpatrick, Warrenpoint, Newcastle, Kilkeel, Ballynahinch, Newtownhamilton and Crossmaglen), as well as four proposed town centres (namely: Saintfield, Killyleagh, Castlewellan and Bessbrook). This followed the format of the health-check assessments contained in Section 4 of the 2020 Study and compared and contrasted changes to a) the composition of each centre, and b) the physical structure and environmental quality of each centre.
 - 4. Review and revise the NMDDC Retail Hierarchy taking account of work undertaken by the Plan team for village centres.
- 4.9 The below summarises information for each town centre, from both the original health check and the follow-up:

Newry City Centre

- 4.10 Newry City Centre is located to the west of the district, approximately 24 miles from Belfast.
- 4.11 The River Clanrye and Newry Canal divide the city with The Butter Crane and The Quays shopping centres to the east bank of the river along with Monaghan Street and the Old Creamery Retail Park. On the west bank of the river is Hill Street, which is the traditional heart of the city and includes the Newry Variety Market, the Town Hall and the main public library.
- 4.12 Newry is well connected by Bus and a large Ulsterbus Station is located on the west side of the River on The Mall close to the traditional heart of the city.
- 4.13 The largest provision of out-of-centre floorspace in the district, Damolly Retail Park, is situated to the north of the city and is easily accessible from the A1 (connecting Belfast to Dublin). The Park is home to a number of larger footprint retail stores including Lidl, Next at Home, and B&Q. A large NISA extra store is located opposite Damolly Retail Park at the Fiveways Centre.
- 4.14 A Tesco Extra food store is located out of the City Centre, just under a mile to the north.
- 4.15 The part of the City Centre to the east of the river is included in a Conservation Area and includes John Mitchell Place, St Mary's Street, Hill Street and the Mall.
- 4.16 Newry is designated as Tier 1: City and Main Town within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 2: Newry

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	34	7.3	27	6.2	9.2
Comparison	156	33.4	134	30.9	27.1
Retail Services	62	13.3	62	14.3	15.6
Leisure Services	81	17.3	77	17.8	24.6
Financial and Business Services	46	9.9	40	9.2	9.1
Vacant	88	18.8	93	21.5	14.2
TOTAL	467	100	433	100	100

Summary of findings:

- 4.17 There have been notable changes in Newry over the period 2019-2022. The provision of national multiple stores has declined significantly, especially within The Quays Shopping Centre. There has also been a significant reduction in the number of town centre use units present in the centre, with 34 less units now than there was in 2019. Some of this will be beneficial though, with long-time vacant units being more beneficially used for residential use, especially on the fringes of the City Centre.
- 4.18 The centre is a largely pleasant environment, although opportunity for further improvements exist throughout the centre. Examples include The Mall, which largely has its back turned to the river, which remains a missed opportunity.

Downpatrick

- 4.19 Downpatrick is located to the east of the district, 23 miles from Belfast.
- 4.20 The main retail area of Downpatrick comprises Market Street, the main shopping street joining with St Patricks Avenue and Irish Avenue, as well as Church Street and Scotch Street found to the north of the town.
- 4.21 Downpatrick Town Centre has been designated as a Conservation area and includes a number of landmark buildings.
- 4.22 Downpatrick is designated as Tier 1: City and Main Town within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030)

Table 3: Downpatrick

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	18	8.2	16	8	9.2
Comparison	60	28.8	56	27.9	27.1
Retail Services	25	12	26	13.4	15.6
Leisure Services	42	20.7	42	20.9	24.6
Financial and Business Services	25	12	22	10.9	9.1
Vacant	38	18.3	39	19.4	14.2
TOTAL	208	100	201	100	100

Summary of findings:

- 4.23 Whilst there have been some changes in terms of the composition of the centre, Downpatrick is performing broadly in line with UK national averages and functions well as a centre, catering for the majority of retail and service needs expected to be found in a settlement of this size.
- 4.24 Environmental improvements to public realm and shop fronts would make the centre appear more welcoming, especially considering the number of derelict buildings located in the centre.
- 4.25 Other opportunities for the centre include creating pedestrian links to Asda from the centre via the car park area to encourage visits between both areas of the town.
- 4.26 The 2019 health check recommended the Downpatrick should capitalise on the historic links of Downpatrick and the Irish Street 'Connecting Stories' initiative is noted as being a positive improvement in this regard.

Newcastle

- 4.27 Newcastle Town Centre is located 32.5 miles from Belfast and is a small seaside resort town by the Irish Sea.
- 4.28 The town centre extends in a linear form from Railway Street and Donard Street to the north along Main Street, which runs parallel to the seafront, and extends along Central Promenade.

- 4.29 The uses in the centre reflect its primary function as a tourist resort with a large number of takeaways, amusement arcades, gift shops, public houses and a variety of tourist accommodation. Amusement arcades are concentrated to the south of the Shimna Bridge.
- 4.30 A Tesco store is located a short distance out-of-centre on Castlewellan Road.
- 4.31 Newcastle is designated as Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 4: Newcastle

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	15	9.9	16	10.7	9.2
Comparison	49	32.5	44	29.5	27.1
Retail Services	12	12.6	21	14.1	15.6
Leisure Services	45	29.8	48	32.2	24.6
Financial and Business Services	10	6.6	8	5.4	9.1
Vacant	13	8.6	12	8.1	14.2
TOTAL	151	100	149	100	100

Summary of findings:

- 4.32 Newcastle Town Centre has natural advantages – a compact centre with high environmental quality in parts, and its location on the coast ensuring a trade in tourism. The centre continues to perform well in terms of retail and services provided, coupled with the low number of vacant units, Newcastle is considered to be a healthy and vibrant town.
- 4.33 There remains the likelihood that Lidl will relocate from the northern end of the centre to an out of centre location, creating an opportunity to provide alternative uses in its place.

Ballynahinch

- 4.34 Ballynahinch Town Centre is located 15 miles to the south of Belfast.
- 4.35 Ballynahinch is a compact centre, with shops and services concentrated along Main Street, High Street, Windmill Street and Dromore Street. Car parking can be found to the rear of units behind Main Street. A Tesco store is located a short distance out-of-centre on Castlewellan Road.
- 4.36 Ballynahinch is designated as Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 5: Ballynahinch

	Units (%) 2019	Units (%) 2019	Units (%) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	9	7.6	11	9.2	9.2
Comparison	32	27.1	33	27.7	27.1
Retail Services	21	17.8	17	14.3	15.6
Leisure Services	24	20.3	27	22.7	24.6
Financial and Business Services	10	8.5	12	10.1	9.1
Vacant	22	18.6	19	16	14.2
TOTAL	118	100	119	100	100

Summary of findings:

- 4.37 Ballynahinch is a compact centre with high environmental quality in parts. The centre works well in terms of services provided and convenience shopping with the composition of the centre being broadly in line with the UK national averages.
- 4.38 Improved accessibility to the car park on Windmill Street may encourage use and ease demand for on-street parking.

Warrenpoint

- 4.39 Warrenpoint is located 10 miles to the south-east of Newry City, on the A2 route linking with Newry and Kilkeel.

- 4.40 Due to the location of Warrenpoint on the coast, it benefits from tourism as a resort town with a strong focus on the Harbour. The retail area of the town is on The Square and Church Street, and partially along a small stretch of Duke Street.
- 4.41 Warrenpoint is designated as a Tier 2: Local and Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 6: Warrenpoint

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	10	11.4	10	10.9	9.2
Comparison	15	17	18	19.6	27.1
Retail Services	12	13.6	15	16.3	15.6
Leisure Services	26	29.5	29	31.5	24.6
Financial and Business Services	7	8	10	10.9	9.1
Vacant	18	20.5	10	10.9	14.2
TOTAL	88	100	92	100	100

Summary of findings:

- 4.42 Warrenpoint Town Centre is fortunate to have natural advantages in terms of its location on the coast, lending itself to position the town as a tourist destination, focusing predominantly on leisure services, although this has had an adverse effect on the availability of comparison goods in the centre. However, the composition of the centre is otherwise broadly in line with UK national averages.

Crossmaglen

- 4.43 Crossmaglen is a small town approximately 25 miles southwest of Newry and is located close to the border with the Republic of Ireland.
- 4.44 The retail core of the town is set around Cardinal O Fiaich Square, where car parking to service the town is also located, with additional units along North Street.
- 4.45 Crossmaglen is designated as Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 7: Crossmaglen

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	8	14.3	6	10.3	9.2
Comparison	8	14.3	10	17.2	27.1
Retail Services	8	14.3	9	15.5	15.6
Leisure Services	15	26.8	18	31	24.6
Financial and Business Services	4	7.1	3	5.2	9.1
Vacant	13	23.2	12	20.7	14.2
TOTAL	56	100	58	100	100

Summary of findings:

- 4.46 Crossmaglen is a largely well-kept centre which offers a range of functions to its immediate population. It performs a role in serving the everyday basic needs of the local community in terms of retail and leisure services.
- 4.47 Crossmaglen remains broadly similar in terms of composition to the 2019 health checks were undertaken.

Kilkeel

- 4.48 Kilkeel is the southern-most town in Northern Ireland, located 20 miles southeast of Newry and 12 miles east of Warrenpoint.
- 4.49 The main commercial and retail areas within the town centre itself are focused on the town's two main thoroughfares, namely Newry Road/Newcastle Street and Greencastle Street/Bridge Street. The town has a coastal setting based around an established harbour, with a backdrop to the north provided by the Mourne Mountains.
- 4.50 Kilkeel is designated as Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030)

Table 8: Kilkeel

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	9	8	12	10.6	9.2
Comparison	24	21.2	26	23	27.1
Retail Services	19	16.8	17	15	15.6
Leisure Services	24	21.2	25	22.1	24.6
Financial and Business Services	13	11.5	13	11.5	9.1
Vacant	24	21.2	20	17.7	14.2
TOTAL	113	100	113	100	100

Summary of findings:

- 4.51 The centre is currently performing broadly in line with UK national averages in terms of composition and serves the local area well. The number of vacancies is of slight concern, especially the concentration of empty units on Newry Street.
- 4.52 Kilkeel is a town centre with potential, the unusual layout, topography, underutilised river area and opportunity to strengthen links with the harbour and sea would suggest that the town could be a destination, much like nearby Newcastle. Public realm improvements throughout the centre would be beneficial, as would a shop front scheme to enhance the attractiveness of the centre.

Newtownhamilton

- 4.53 Newtownhamilton Town Centre is located approximately 11 miles west of Newry.
- 4.54 The town centre is linear, running along Dundalk / Armagh Street (A29) with a small number of units on The Square.
- 4.55 Newtownhamilton is designated as Tier 3: Villages within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 9: Newtownhamilton

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	6	18.8	6	20.7	9.2
Comparison	2	6.3	1	3.4	27.1
Retail Services	6	18.8	6	20.7	15.6
Leisure Services	5	15.6	6	20.7	24.6
Financial and Business Services	2	6.3	2	6.9	9.1
Vacant	11	34.4	8	27.6	14.2
TOTAL	32	100	29	100	100

Summary of findings:

- 4.56 Newtownhamilton is underperforming in its role as a Tier 3: Villages, with a high proportion of vacant units and offering little by way of comparison goods.
- 4.57 The town suffers from poor environmental quality with regular traffic congestion. Narrow paving, on-street parking and the intermittence of the retail frontage, makes it a difficult centre to navigate.
- 4.58 Nexus suggest that the centre is more akin to being a Tier 5 centre.

Castlewellan

- 4.59 Castlewellan Village Centre is located 11 miles southwest of Downpatrick and next to Castlewellan Lake and Slievenaslat Mountain.
- 4.60 The centre is based on a linear formation along Main Street and is unique due to its tree-lined squares both in the old town (upper square) and new town (lower square) as well as its very wide main street. The retail core of Castlewellan is within a Conservation Area, designated in December 1992.
- 4.61 Castlewellan is designated as Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 10: Castlewellan

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	7	11.1	6	9	9.2
Comparison	15	23.8	16	23.9	27.1
Retail Services	10	15.9	8	11.9	15.6
Leisure Services	24	38.1	26	38.8	24.6
Financial and Business Services	2	3.2	5	7.5	9.1
Vacant	5	7.9	6	9	14.2
TOTAL	63	100	67	100	100

Summary of findings:

- 4.62 Castlewellan is an attractive centre and is performing well, as the low vacancy rate in 2019 would indicate. The 2019 report notes that investment in improved street furniture should be encouraged, for example, improved seating, bins and heritage signage, to enhance the appearance of the centre.
- 4.63 Car parking is limited in Castlewellan, and the car parks are used by commuters travelling into Belfast. All day use of the car parks could be discouraged by implementing parking restrictions.
- 4.64 Castlewellan continues to perform well, as the maintained low vacancy rate in 2022 would indicate.

Killyleagh

- 4.65 Killyleagh Village Centre is located approximately 6 miles to the northeast of Downpatrick and can be accessed via the A22 which runs through the centre. The centre is based on a crossroads with the retail core running along High Street, Cross Street and Downpatrick Road.
- 4.66 Killyleagh Castle is a dominant feature of the centre and overlooks the town towards the harbour on Strangford Lough.
- 4.67 A Conservation Area was designated in 1993, covering the retail core for Killyleagh and beyond.

- 4.68 Killyleagh is designated as a Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 11: Killyleagh

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	6	13.6	6	14.6	9.2
Comparison	9	20.5	7	17.1	27.1
Retail Services	8	18.2	8	19.5	15.6
Leisure Services	12	27.3	10	24.4	24.6
Financial and Business Services	1	2.3	2	4.9	9.1
Vacant	8	18.2	8	19.5	14.2
TOTAL	44	100	41	100	100

Summary of findings:

- 4.89 Killyleagh is an attractive centre containing many Listed Buildings, as well as Killyleagh Castle, which is a dominate feature of the centre.
- 4.90 Killyleagh fulfils the role of a Village Centre serving the local population well in regard to convenience goods, retail and leisure services. There is, however, an under-provision of comparison goods and the number of vacant units has remained high from 2019-2022.

Saintfield

- 4.91 Saintfield Village Centre is located midway between Belfast (approximately 11 miles) and Downpatrick.
- 4.92 Saintfield is a traditional centre with a linear high street (Main Street), joining to the A7 at the crossroads with Belfast Road, Crossgar Road and Todd's Hill to the east of the centre. The village centre is included in a Conservation Area and contains many Listed Buildings.
- 4.93 Saintfield is designated as a Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 12: Saintfield

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	9	13.8	8	11.9	9.2
Comparison	20	30.8	21	31.3	27.1
Retail Services	10	15.4	10	14.9	15.6
Leisure Services	8	12.3	12	17.9	24.6
Financial and Business Services	8	12.3	9	13.4	9.1
Vacant	10	15.4	7	10.4	14.2
TOTAL	65	100	67	100	100

Summary of findings

- 4.94 Saintfield is an attractive centre with a small number of very important independent retailers who provide it with a niche attraction for certain items.
- 4.95 As witnessed at the time of the site visits, parking is limited within the centre, with some commuters and shop owners using on-street parking throughout the day.
- 4.96 Saintfield continues to perform well in its role and function.

Bessbrook

- 4.97 Bessbrook is located 3.5 miles northwest of Newry and 39 miles from Belfast.
- 4.98 Bessbrook was founded in 1845 as a 'model village' whose streets and squares comprise of granite houses arranged in terraces round two squares linked by a broad road. The Village Centre was designated as a Conservation Area in 1983 and includes the main shopping area within Bessbrook.
- 4.99 Bessbrook is designated at Tier 2: Local & Small Towns within the proposed Settlement Hierarchy (Newry, Mourne and Down Local Development Plan Preferred Options Paper 2030).

Table 13: Bessbrook

	Units (No) 2019	Units (%) 2019	Units (No) 2022	Units (%) 2022	Units (%) UK Average Oct. 2021
Convenience	4	23.5	5	29.4	9.2
Comparison	5	29.4	4	23.5	27.1
Retail Services	4	23.5	4	23.5	15.6
Leisure Services	1	5.9	1	5.9	24.6
Financial and Business Services	1	5.9	1	5.9	9.1
Vacant	2	11.8	2	11.8	14.2
TOTAL	17	100	17	100	100

Summary of findings

- 4.100 Bessbrook offers a pleasant and welcoming environment that appears to be well maintained. Shop frontages are attractive and add character to Bessbrook.
- 4.101 The composition of the centre suggests that the village is performing well in serving the needs of the local population in terms of the convenience stores on offer for a centre of its size. The variety of retail services available within the centre makes it necessary to travel elsewhere, however, given Bessbrook's proximity to Newry, the opportunity to expand the centre would appear to be limited.
- 4.102 The composition of the centre suggests that the village is continuing to perform well in serving the needs of the local population.

The Retail Hierarchy

- 4.103 The above summarised information, as well as the full detailed studies of each town in Appendix 4A, was used to recommend an appropriate hierarchy of centres for the district. Section 5 of the original Study provides a full assessment of the policy basis and other considerations for applying this suggested hierarchy.

Table 14: Nexus 2020 Recommended Retail Hierarchy

Tier	Definition	Settlement
1 – City Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a significant hinterland which includes smaller neighbouring towns or a number of suburbs.	Newry
2 – Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a hinterland which includes neighbouring villages or a few surrounding suburbs.	Downpatrick Newcastle Ballynahinch Kilkeel
3 – District/Small Town Centre	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a surrounding suburban community.	Warrenpoint Saintfield Castlewellan Crossmaglen Killyleagh
4 – Local/Rural Centres	Provides (or has the potential to provide) a range of shops and services to a surrounding community.	Newtownhamilton Bessbrook

Village Assessments

- 4.104 The Council produced a series of assessments, titled 'Village Assessments', following a recommendation in the 2019 study. This recommendation was in recognition that a number of smaller centres were attracting retail custom based on household surveys completed.
- 4.105 These assessments were built on the original Nexus Report and sought to establish which destinations outside of the 12 centres considered outside the original study might form part of Tier 5.
- 4.106 In total, 22 village assessments were produced by the Council. Each was considered in terms of its ranges of uses/services, vacancy rate, parking provision, access to public transport and footfall, which culminated in a recommendation as to whether the centre should be brought forward for inclusion within the retail hierarchy or not.
- 4.107 The following 10 centres should be brought forward for inclusion:
- Ardglass
 - Clough
 - Crossgar
 - Dundrum
 - Strangford
 - Annalong

- Camlough
- Hilltown
- Mayobridge
- Rostrevor

4.108 The below table summarises brief details of their retail and community facility components, which are considered key aspects when considering their inclusion within the hierarchy:

Table 15: Council Village Assessment – Extrapolated Findings

Location	No. of units	Community Facilities
Ardglass	27 (including 7 vacant)	Play Park, Primary School and 2 x Churches
Clough	16 (including 5 vacant)	Church
Crossgar	50 (including 3 vacant)	2 x Churches
Dundrum	26 (including 5 vacant)	Education Centre, Church
Strangford	15 (no vacant)	
Annalong	11 (including 2 vacant)	Doctors Surgery, Community Centre, Primary School and 3 x Churches
Camlough	36 (including 2 vacant)	Primary School, Church
Hilltown	25 (including 3 vacant)	Youth Centre, Church
Mayobridge	10 (including 1 vacant)	Community Centre, Primary School, Church
Rostrevor	27 (including 2 vacant)	Youth Centre, Health Centre, 2 x Primary School, 3 x Churches

4.109 In the intervening period following publication of the 2020 Nexus report, Council prepared an updated retail hierarchy for the district. This distinguishes between Local Centres (Tier 4) and Village Centres (Tier 5). Tier 4 is proposed to include suburban Local Centres, namely Ballymote (Downpatrick) and Fiveways (Newry).

4.110 Incorporating the additional Tier 5 suggested by the Council, the updated recommendation in respect of a retail hierarchy is listed below.

Table 16: Nexus 2022 Recommended Retail Hierarchy

Tier	Definition	Settlement
1 – City Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a significant hinterland which includes smaller neighbouring towns or a number of suburbs.	Newry
2 – Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a hinterland which includes neighbouring villages or a few surrounding suburbs.	Downpatrick Newcastle Ballynahinch Kilkeel
3 – District/ Small Town Centre	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a surrounding suburban community.	Warrenpoint Saintfield Castlewellan Crossmaglen Killyleagh Crossgar
4 – Local Centres	Provides (or has the potential to provide) a limited range of shops, services, businesses and community facilities to serve the immediate local area.	Fiveways (Newry) Ballymote (Downpatrick)
5 – Village Centres	Provides (or has the potential to provide) a range of shops and services to a surrounding community.	Newtownhamilton Bessbrook Ardglass Rostrevor Clough Dundrum Strangford Annalong Camlough Hilltown Mayobridge

Summary of findings

- 4.111 The retail study and associated update highlight that overall, the district's high streets continue to perform well, demonstrating resilience in difficult trading conditions. The district's two largest centres, Newry and Downpatrick, experienced some increase in vacancy rates however the remaining centres all experienced a drop in vacancy levels over the study period. Findings from the study's household survey highlights that the district retains approximately 85.1% of its residents own spending on convenience goods and 67.7% of

their spending on comparison goods is retained. Relative to other parts of the UK, including Northern Ireland, these are regarded as healthy retention rates and do not indicate any significant concerns with the outflow or leakage of trade.

- 4.112 In terms of convenience market share a small number of stores are very dominant, with the four largest stores attracting over a third of all convenience spending (36.2%). With this group the Asda stores in Downpatrick and Kilkeel are located within the Town Centre boundary, while the Tesco stores in Newry and Newcastle are located outside the Town Centre.
- 4.113 In terms of comparison goods, the Retail Study highlights that Newry city centre attracts by some margin the greatest proportion of comparison spending within the district (37.1%). Downpatrick is the second most visited centre for comparison goods spending (7.8%) with Damolly Retail Park, Newry also attracting a significant proportion of turnover (6.2%). Out of town retail parks attract 15% of the district's resident's comparison goods spending. The retail study noted that this was a relatively low percentage comparative to other parts of Northern Ireland and the UK, however there was still a need to protect the district's designated centres from significant erosion of market share. Survey results indicated that over 70% of the residents regularly shop for bulk comparison goods closer to home. The Retail study noted that this was a high retention rate and reflected the popularity of the combined facilities of Newry, Downpatrick and Kilkeel.
- 4.114 From a leisure point of view the district also successfully provides for its resident population in almost all instances of the leisure categories identified, with Newry being the being the first leisure destination of choice in all but one category. The only category where the most popular destination was not a destination in the district was 'most popular cultural destination' where Belfast was most popular.
- 4.115 The study concluded that there was capacity to support further convenience goods floorspace (between 5,500 – 6,000 sq. m net in 2022 increasing to 6,400 – 7,300 sq. m net by 2035) and comparison goods floorspace (between 800 – 1,300 sq. m in 2025 increasing to 1,900 – 3,000 sq. m net by 2035). Neither the qualitative nor quantitative assessment of leisure need identified any significant gaps.
- 4.116 Within both reports it has been highlighted that it is increasingly paramount to allow for suitable flexibility of use within our town centres. With the Covid-19 pandemic having further accelerated the shift to online shopping, it becomes increasingly vital that retail and leisure services, as well as residential and other commercial/employment uses, underpin town centres in order to maintain their vitality and viability.

- 4.117 The health check studies highlight that, in common with many other parts of the UK, smaller towns and villages in the district have benefitted from people working closer to home over the pandemic. Levels of vacancies have been stable and, in the majority of cases, have decreased. This is true of nine of the 12 centres surveyed: Newcastle, Ballynahinch, Warrenpoint, Crossmaglen, Kilkeel, Newtownhamilton, Saintfield and Bessbrook.

5.0 Consultee and Councillor Engagement

- 5.1 The Council has carried out extensive engagement with statutory and non-statutory consultees in preparation of the Preferred Options Paper and draft Plan Strategy.
- 5.2 A series of workshops with councillors and relevant council departments were carried out prior to the publication of the Preferred Options Paper between November 2017-May 2018.
- 5.3 Following on from receipt and publication of the first Retail and Commercial Leisure Capacity Study, several workshops were facilitated by the Council, to allow presentation of the key findings of the study in 2019. Topics covered in these stakeholder events included:
- Town Centre Findings (Newry City Centre, Downpatrick, Newcastle, Ballynahinch, Warrenpoint, Crossmaglen, Kilkeel, Newtownhamilton, Castlewellan, Killyleagh, Saintfield and Bessbrook)
 - Internet speed
 - Retail Market Shares; and
 - Comparison Goods
- 5.4 Attendees across the events made a number of comments, including:
- Northern Ireland has a good proportion of independent retailers remaining in town centres. This has largely been lost in England and Scotland.
 - The cost of rates in the district.
 - A desire for more people to live in the main street (Saintfield Regeneration Group)
 - Traffic and congestion issues, including air and noise pollution associated with HGV traffic and a higher proportion of school bus traffic (Saintfield Regeneration Group)
 - Ballynahinch has a particular issue with absentee landlords, rather than true vacancy. Respondent also noted that there can be a desire to park right outside the shop they are going to, rather than walk.
- 5.5 The draft Plan Strategy Retail policies were subsequently presented to Members of the Council's Planning Committee on the 11 May 2022.

- 5.6 Finalised draft policies and designations were brought back to Members at a Special Committee on the 31 March 2025, these were approved and the decision ratified by full Council on the 6 May 2025.

6.0 Draft Plan Strategy Approach

- 6.1 The principal approach of the draft Plan Strategy is to facilitate the aims and objectives of the RDS and SPPS by providing a strategic policy framework that promotes established town centres as the first-choice location for retailing and other complementary functions consistent with the RDS.
- 6.2 Regional strategic objectives within the SPPS seek to adopt a sequential approach to the identification of retail and main town centre uses; protect and enhance diversity within town centres; provide sustainable, attractive, accessible and safe environments while maintaining and improving accessibility to and within the town centre.
- 6.3 In line with regional policy, the Council's Retail Strategy seeks to promote a town centre first approach for retailing and other main town centre uses. It brings forward a hierarchy of centres which provides a framework to allow a sequential test to be applied to planning applications relating to main town centre uses, ensuring that they are directed to the most appropriate locations. The draft Plan Strategy Retail Hierarchy is set out in Table 6.1. This largely aligns with the settlement hierarchy and provides a spatial framework for the retail subject policies.
- 6.4 In the identification of its Retail Hierarchy, the Council have been mindful of the need to support the vitality and vibrancy of town centres and allow for flexibility in the consideration of town centre developments. Town centres are changing and offer not just locations for retail but for social activity and recreation. The Councils retail hierarchy and subject policies, and associated designations seek to maximise potential footfall generating development within the centres whilst discouraging out of centre competition.

Table 17: Retail Hierarchy

Tier	Definition	Settlement	Designation
City Centre	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a significant hinterland which includes smaller neighbouring towns or a number of suburbs.	Newry	City centre boundary. Primary retail core and frontage.

Town Centre	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a hinterland which includes neighbouring villages or few surrounding suburbs.	Downpatrick Newcastle Ballynahinch Kilkeel Warrenpoint	Town centre boundary. Primary retail core.
Small Town Centre	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a hinterland which includes neighbouring villages and the surrounding rural area.	Saintfield Castlewellan Crossmaglen Crossgar ³ Killyleagh	Town centre boundary.
Local Centre	Provides (or has the potential to provide) a limited range of shops, services, businesses and community facilities to serve the immediate local area.	Fiveways (Newry) Ballymote (Downpatrick)	Local centre boundary.
Villages and Small Settlements	Provides (or has the potential to provide) a limited range of shops and services generally comprising a grocery store, occasionally a petrol filling station, and other small shops of a local nature serving a village and surrounding rural areas.	As proposed in the settlement hierarchy	No boundary or designation.

Relevant Retail Policies

- Policy RET1 – Town Centre First
- Policy RET2 – Primary Retail Core and Primary Retail Frontage
- Policy RET3 – Retail Impact Assessment and assessment of need
- Policy RET4 – Retail Development outside City and Town Centres
- Policy RET5 – Local Neighbourhood Centres
- Policy RET6 – Retail Development in Villages & Small Settlements
- Policy RET7 – Retail Development in the Countryside

³ While Crossgar is included in Tier 3 – Small Town Centres in the recommended Retail Hierarchy, it is proposed as a village in the LDP Settlement Hierarchy. Although the population is low it far exceeds other villages in terms of its retail offer.

- 6.5 The fundamental approach adopted in the draft Plan Strategy, in line with the SPPS, is to secure a town centre first approach to retailing and other main town centre uses. The town centre first approach seeks to promote established centres as the appropriate first choice for retailing and other complementary uses and so support and sustain the vibrancy of the district's centres (Policy RT1).
- 6.6 Policy RT2 reflects the Council's wish to ensure that PRC designations are protected from non-retail development that could undermine their capacity to sustain and enhance the city/town centre in question. The policy recognises that upper floors within PRCs can be under-utilised and present opportunities to introduce uses which can complement the retail offering within the PRC.
- 6.7 A Retail Impact Assessment is an important tool when assessing the relative effect that a proposed development would have on the wider centre hierarchy. A Retail Impact Assessment is required where a proposed extension would result in the overall development exceeding those thresholds outlined with Policy RT3.
- 6.8 Circumstances whereby retail development outside city and town centres, within local neighbourhood centres, in villages and small settlements and in the countryside could be deemed appropriate is outlined within Policies RT4, RT5, RT6 and RT7.

7.0 Soundness

- 7.1 The draft Plan Strategy has been prepared to take due regard to meeting the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the strategic policies and proposals relating to retailing and town centres is regarded as sound because it meets the various tests of soundness as summarised below.

Table 18: Soundness

Procedural Tests	
P2	The Retail Strategy, Retail Hierarchy and retail policies have evolved from the POP, POP consultation Report and Consultee and Councillor Engagement.
P3	The Retail Strategy, Retail Hierarchy and Retail Policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	

C1	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the RDS, particularly RG1 and RG7 and the spatial framework guidance as it applies to Newry, Mourne and Down District Council.
C2	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the Community Plan.
C3	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the SPPS, particularly paragraphs 6.267-6.292 relating to Town Centres and Retailing. Regard has also been given to PPS6: Built Heritage with respect to policies to protect historic buildings, archaeological features and remains and areas of importance to the historic environment such as Conservation Areas, all of which may fall within town centres. Supplementary planning guidance on place making has also been taken into account.
C4	The Retail Strategy, Retail Hierarchy and retail policies have had regard to the existing development plans within Newry, Mourne and Down District Council, Council's Economic Development Strategy and the emerging proposals of neighbouring councils.
Coherence and the Effectiveness tests	
CE1	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the emerging LDP's of our neighbouring Councils, and it is not considered to be in conflict with them.
CE2	<p>The Retail Strategy, Retail Hierarchy and retail policies are founded on a robust evidence base which includes:</p> <ul style="list-style-type: none"> • the Retail and Commercial Leisure Study by Nexus Planning (September 2020) • the Retail and Commercial Leisure Supplementary Study by Nexus Planning (April 2022) • Village Assessments
CE3	The Monitoring Framework outlines that the amount of net additional retail floorspace in main towns will be monitored and if more than 10% of retail floorspace approved in any one year is outside town centres a review will be triggered.
CE4	<p>There will be flexibility for the Local Policies Plan to identify the extent of the main town centre boundaries as well as identification of development opportunity sites following a:</p> <p>'Call for sites' consultation exercise at LPP Stage. Key Site Requirements can be attached to the identified development opportunity sites, where necessary, to reflect current town centre needs. Retail/town centre policies and proposals will be reviewed at Plan Review Stage.</p>

8.0 Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	<p>6.271 of the SPPS seeks to secure a town centre first approach for location of future retailing and other main town centres uses and adopt a sequential approach to site selection.</p> <p>6.280 of the SPPS states a sequential test should be applied to applications outside an existing town centre and if sequentially preferable site exists in whole catchment, less sequentially preferable sites will be refused.</p> <p>6.287 of the SPPS defines edge of centre as a default distance of 300m from town centre boundary.</p>	Not raised as key issue in POP.	<p>DfI Strategic Planning made a number of comments on the POP's economic objectives, including highlighting the absence of options in relation to retailing and town centres.</p> <p>DfI Strategic Planning noted that any policies brought forward for town centres and retail development should be consistent with its strategies for growth.</p> <p>DfI Strategic Planning noted the linkage between retailing and tourism and the absence of this interdependency within the POP.</p> <p>The district's cross-border potential in this regard should be considered. A retail strategy between Councils is required to address cross-boundary effects.</p> <p>NIHE suggested the Council should consider reviewing the spatial extent and</p>	<p>New Policy RET1: Town Centre First This policy was developed to reflect the SPPS position and evidence provided by consultants. The policy aims to secure a town centre first approach for the location of retailing and other complementary town centre uses. Sequential approach to site selection outlined within policy for other locations. Proposals for other town centre uses (cultural and community facilities, leisure, entertainment and office) must follow the sequential test specified within policy. Council will support proposals for new retail development proposals to convert non-retail to retail use within the Primary Retail</p>

			<p>function of existing town centre boundaries and primary retail cores.</p> <p>NIHE also noted that the Plan should consider the long-term future of town centres in the context of changed shopping patterns, the increase in vacant units and consequent need to diversify uses.</p> <p>Planning Agents noted the absence of any options around retailing, town centres and opportunity sites.</p> <p>Planning Agents also noted that changing retail trends should be referenced, and that there should be re-consultation on the POP following the gathering of retail evidence.</p>	Core (PRC), where defined
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the	6.277 of the SPPS outlines that LDPs should define the spatial extent of town centres and the primary retail core.	Not raised as key issue in POP.	None	<p>New Policy</p> <p>RET2: Primary Retail Core and Primary Retail Frontage</p> <p>This policy was developed to reflect the SPPS position and evidence provided by consultants. Policy outlines circumstances</p>

introduction of the Strategic Planning Policy Statement (SPPS).				when proposals for non-retail uses at ground floor level will be permitted within Primary Retail Core and Primary Retail Frontage. Policy supports proposals for retail and other main town centre uses within the Primary Retail Core.
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	6.283 of the SPPS advises that all applications for retail or town centre type developments above a threshold of 1000 sq metres gross external area, which are not in a town centre location or not in accordance with the LDP require an assessment of retail impact as well as need, although it advises that councils can adjust the thresholds to take into account local circumstances such as size, role and function of their town centres. 6.290 lists factors to be addressed in RIA, with 6.291 stating that where an impact on one or more of the list is significantly adverse or in balancing impacts overall, the proposal is judged	Not raised as key issue in POP.	None	<p>New Policy</p> <p>RET3: Retail Impact Assessment and Assessment of Need</p> <p>This policy was developed to reflect the SPPS position. Policy outlines the thresholds for retail development and town centre uses which require a Retail Impact Assessment.</p> <p>Two thresholds are set out covering Newry City centre (750 sqm) and all other town centres (500 sqm).</p>

	to be harmful, then it must be refused.			
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	<p>6.271 of the SPPS seeks to secure a town centre first approach for location of future retailing and other main town centres uses and adopt a sequential approach to site selection.</p> <p>6.277 Set out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations, and the factors that will be taken into account for decision making.</p>	Not raised as key issue in POP.	None	<p>New Policy RET4: Retail Development Outside City and Town Centres</p> <p>Policy outlines circumstances whereby development may be permitted for small-scale convenience shops outside town centres, but within the town's settlement limit. Policy outlines circumstances whereby development of convenience retail facility at a roadside service facility will be permitted.</p>
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	6.276 of the SPPS states that Planning authorities should retain and consolidate existing district and local centres as a focus for everyday shopping, and ensure their role is complementary to the role and function of the town centre. In these centres, extensions should only be permitted where the applicant has demonstrated that no adverse impact	Not raised as key issue in POP.	None	<p>New Policy RET5: Local Centres</p> <p>This policy was developed to reflect the SPPS position and evidence provided by retail consultants. Policy outlines circumstances where additional retail provision at existing local centres may be permitted.</p> <p>It highlights that proposals for a convenience shopping in</p>

	will result on town centres in the catchment.			excess of 500 square metres will require a Retail Impact assessment. It also indicates that comparison shopping will not be permitted.
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	6.278 of the SPPS states policies and proposals for local shops in villages and small settlements must be consistent with the aim, objectives and policy approach for town centres and retailing, meet local need and be of a scale, nature and design appropriate to the character of the settlement.	Not raised as key issue in POP.	None	New Policy RET6: Retail Development in Villages and Small Settlements This policy was developed to reflect the SPPS position. Policy outlines circumstances where retail development within villages and small settlements may be permitted.
Operational planning policy contained within Planning Policy Statement 5 Retailing and Town Centres has been cancelled by the introduction of the Strategic Planning Policy Statement (SPPS).	6.279 of the SPPS states that inappropriate retail facilities in the countryside will be resisted but lists exceptions: farm shops, craft shops and shops serving tourist or recreational facilities, to be located within existing buildings. SPPS is silent on Roadside Service Facilities. However, it is not listed as one of the specified exceptions to the general	Not raised as key issue in POP.	None	New Policy RET7: Retail Development in the Countryside This policy was developed to reflect the SPPS position. Policy outlines the general presumption against development of retail facilities in the open countryside. Policy also outlines exceptions to this policy.

	presumption against retail development in the countryside (para 6.279).			
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Appendices

Appendix 4A Retail and Commercial Leisure Capacity Study (2020)

Appendix 4B Supplementary Retail and Commercial Leisure Study (2022)

Note: The above Appendices are separate documents and can be viewed on the Council's website

0330 137 4000
info@nmandd.org
www.newrymournedown.org

 facebook.com/nmdcouncil

 x.com/nmdcouncil

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



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