

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

**Forlíonadh Teicniúil 7 - Measúnú Tuaithe**  
**Meitheamh 2025**

**Technical Supplement 7 – Countryside Assessment**  
**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

## Contents

<b>1.0</b>	<b>Introduction</b>	<b>3</b>
<b>2.0</b>	<b>Policy Context</b>	<b>3</b>
<b>3.0</b>	<b>Preferred Options Paper</b>	<b>10</b>
<b>4.0</b>	<b>Countryside Assessment</b>	<b>15</b>
<b>4.1</b>	<b>Environmental Assets Appraisal</b>	<b>15</b>
<b>4.2</b>	<b>Landscape Character Review – Executive Summary</b>	<b>35</b>
<b>4.3</b>	<b>Development Pressure Analysis</b>	<b>43</b>
<b>4.4</b>	<b>Settlement Appraisals – Executive Summary</b>	<b>46</b>
<b>5.0</b>	<b>Consultee and Councillor Engagement</b>	<b>47</b>
<b>6.0</b>	<b>Draft Plan Strategy Policy Approach</b>	<b>47</b>
<b>7.0</b>	<b>Soundness</b>	<b>51</b>
<b>8.0</b>	<b>Evolution of Policies</b>	<b>53</b>

## Appendices

Appendix 7A Landscape Character Review

Appendix 7B Strategic Settlement Appraisal

## 1.0 Introduction

- 1.1 The purpose of this technical supplement is to bring together the evidence base that has been used to inform the preparation of the Newry, Mourne and Down Local Development Plan 2035, 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 6 Environmental Assets (January 2016); Preparatory Paper 12: Landscape Character Assessment (March 2017) and Development Pressure Analysis (April 2017); Preparatory Paper 15 Strategic Settlement Evaluation (December 2017) and 15(a) addendum (January 2018). These provide baseline information for the 4 strands contained within the Countryside Assessment and formed part of the evidence base for the Preferred Options Paper (POP) which was published in May 2018.
- 1.3 This technical supplement provides an overview of the regional and local policy context in regards the district's countryside.
- 1.4 A Landscape Character Assessment (October 2020) was undertaken on behalf of Newry, Mourne and Down District Council by Ironside Farrar Environmental Consultants. Additionally, a Strategic Settlement Appraisal was carried out by the LDP team. These reports form the evidence base for the draft Plan Strategy and are provided at Appendix 7A and Appendix 7B respectively.

## 2.0 Policy Context

### Regional Policy Context

#### Programme for Government

- 2.1 The latest Programme for Government (PfG) 'Our Plan, Doing What Matters Most,<sup>1</sup>' was adopted by the Executive on February 27 2025. The PfG refers to the important role of the agri-food and fishing sectors in the economy and also highlights the need to provide a regionally balanced economy as well as meeting net zero obligations and adapting to climate change.

#### Regional Development Strategy 2035<sup>2</sup>

- 2.2 The Regional Development Strategy 2035 (RDS) is the spatial strategy of the Executive and sets out an overarching strategic framework to guide the private and public sectors and it is material to the consideration of individual planning applications. One of its aims is 'Support our towns, villages and rural communities to maximise their potential'.

---

<sup>1</sup> [Programme for Government 2024-2027](#)

<sup>2</sup> [Regional Development Strategy 2035](#)

- 2.3 Several of its provisions relate to the remit of the LDP:
- RG7 Support Urban and Rural Renaissance.
  - RG8 Manage patterns of housing growth to achieve sustainable patterns of residential development.
  - RG11 Conserve, protect and, where possible, enhance our built heritage and our natural environment
  - SFG13 Sustain rural communities living in smaller settlements and the open countryside.
  - SFG14 Improve accessibility for rural communities.

### **Strategic Planning Policy Statement 2015<sup>3</sup>**

- 2.4 The Strategic Planning Policy Statement for Northern Ireland (SPPS) is a statement of the Department's policy on important planning matters that should be addressed across Northern Ireland. It reflects the Environment Minister's expectations for delivery of the planning system. It has been agreed by the Northern Ireland Executive, and it is judged to be in general conformity with the Regional Development Strategy 2035.
- 2.5 The SPPS sets out transitional provisions for the preparation and adoption of Local Development Plans by district councils, it identifies the LDP process as playing a key role in the identification of key assets and features to balance the needs of rural areas to provide residential and economic opportunities for their residents with the need to protect these key assets and the wider environment. It also requires all LDP's to be soundly based in accordance with tests on procedure, consistency, coherence, and effectiveness which will be determined during the examination in public. Upon receipt of the report prepared by the PAC or independent examiner, the Department may require the Council to make changes to the Plan Strategy.
- 2.6 Paragraph 5.32 of the SPPS requires all Councils to carry out a Sustainability Appraisal which incorporates a Strategic Environmental Appraisal, this has carried out in association with Shared Environmental Services to ensure that the Plan Strategy complies with the principles of Sustainable Development.
- 2.7 Paragraph 6.76 of the SPPS states that the LDP process will play an important role for Councils in identifying key features and assets of the countryside and balancing the needs of rural areas and communities with protecting the environment. It is also stated that this process should include Environmental Assets Appraisal and Landscape Assessment which will provide an evidence base for bringing forward an appropriate policy approach to development in the countryside, and this should take account of Landscape Character Assessments.

---

<sup>3</sup> [SPPS](#)

- 2.8 The findings of these appraisals have been complemented further by the carrying out of Development Pressure Analysis and Settlement Appraisal exercises, both of which are set out in detail.

### **Planning Policy Statements<sup>4</sup>**

- 2.9 The suite of PPSs was prepared by the former Department of the Environment and cover a range of policy areas, several of them have been either withdrawn or modified by the publication of the Strategic Planning Policy Statement. Those that remain will be superseded within the district upon the adoption of the LDP Plan Strategy as required by paragraphs 1.10-1.16 of the SPPS. The following are the Policies contained within the suite that relate to the countryside either in part or in their entirety:
- PPS2 Natural Heritage, Policies NH3, 4, 5 and 6
  - PPS4 Planning and Economic Development, Policies PED 2, 3, 4, 5, 6 and 9
  - PPS6 Planning, Archaeology, and the Built Heritage Policies BH 1, 2, 6, 11 and 15
  - PPS8 Open Space, Sport, and Recreation; Policies OS3, 4, 5 and 6
  - PPS10 Telecommunications, Policy TEL1
  - PPS11 Planning and Waste Management Policies WM1 and 2
  - PPS15 Planning and Flood Risk, Policies FLD1, 3, 4 and 5
  - PPS16 Tourism, Policies TSM 2, 3, 4, 5, 6, 7 and 8
  - PPS21 Sustainable Development in the Countryside, All Planning Policies
- 2.10 Paragraph 4.2 of Planning Policy Statement 21 refers to Countryside Assessments as playing an integral part of the development plan process, it states that they will normally consist of 4 interrelated strands:
- Part 1 – Environmental Assets Appraisal
  - Part 2 – Landscape Assessment
  - Part 3 – Development Pressure Analysis
  - Part 4 – Settlement Appraisal
- 2.11 In addition, the Environmental Assets Appraisal consists of sub-sections on Natural Heritage, Historic Environment and Landscape and Public Access to the Countryside.

### **Planning Strategy for Rural Northern Ireland<sup>5</sup>**

- 2.12 The Planning Strategy for Rural Northern Ireland (PSRNI) was first published in September 1993, it extended to all the towns, villages, small settlements, and countryside outside of the Belfast Metropolitan Area (BMA) and Derry. Its policy provisions with been largely superseded by the subsequent suite of

---

<sup>4</sup> [DfI - Retained Planning Policy](#)

<sup>5</sup> [A Planning Strategy for Rural Northern Ireland](#)

Planning Policy Statements. The following policies have remained in effect and will be superseded upon the adoption of the LDP Plan Strategy: -

- CO1 The Undeveloped Coast
- CO4 Access to the Coast
- PSU10 Development at Risk
- PSU11 Overhead Cables
- IC15 Roadside Service Facilities.

### **Northern Ireland Biodiversity Strategy 2020<sup>6</sup>**

- 2.13 The Strategy sets out how NI plans to achieve its international obligations and local targets to protect biodiversity and ensure that the environment can continue to support our economy and society. The Strategy lists several priority areas, the most relevant to the LDP is 'to strike an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better-quality environment'.
- 2.14 The Strategy also sets out several strategic objectives, the most relevant are:
- Ensure an appropriate policy and legislative framework is in place supported by a regulatory regime.
  - which will deliver statutory environmental standards in respect of air, water and other environmental pollution.
  - Promote sustainable land management.
  - Promote sustainable marine management.
  - Ensure our built heritage is used in a sustainable way.
  - Improve the quality of life of our people by planning and managing development in ways which are sustainable, and which contribute to creating a better environment, and.
  - Take action to reduce biodiversity loss.

### **Draft Marine Plan for Northern Ireland<sup>7</sup>**

- 2.15 The Draft Marine Plan is the first stage in the preparation of a Marine Plan for Northern Ireland that will when adopted inform and guide the regulation, management, use and protection of the Northern Ireland Marine Area. It will consist of two sections, Inshore and Outshore, as the district has a long and distinctive coastline that contains significant parts of two of Northern Ireland's main tidal loughs, Strangford and Carlingford. Its provisions have been used to inform policy decisions.
- 2.16 Many agricultural processes can result in pollution of aquatic ecosystems from ammonia etc. The LDP seeks to minimise these risks by providing a policy framework for the assessment and mitigation of risks as well as seeking to encourage the development of sustainable means for addressing pollution risks e.g. anaerobic digestors.

---

<sup>6</sup> [Northern Ireland Biodiversity Strategy](#)

<sup>7</sup> [Draft Marine Plan for Northern Ireland](#)

## **Local Policy Context Existing Area Plans<sup>8</sup>**

- 2.17 The existing Development Plans that apply to the district are;
- Banbridge/Newry and Mourne Area Plan 2015 (adopted 2013)
  - Ards and Down Area Plan 2015 (adopted 2009)
- 2.18 These Plans provide the policy framework against which to assess development proposals.
- 2.19 The 'countryside' as referred to in this paper is defined as the land outside designated settlement limits as identified in the Ards and Down Area Plan 2015 (ADAP) and the Banbridge/Newry and Mourne Area Plan 2015 (BNMAP).

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

- 2.20 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.
- 2.21 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 Community Plan 2030 – "Living Well Together"<sup>9</sup>**

- 2.22 The Local Government (NI) Act 2014 introduced a requirement for Councils to undertake a Community Plan for its area to provide a framework for collaborative working to deliver positive change for their communities, prepared in conjunction with other statutory bodies. The Council's current

---

<sup>8</sup> [Existing Area Plans \(PRONI web archive\)](#)

<sup>9</sup> [NMDDC - Community Plan 2030 'Living Well Together'](#)

plan is based on the vision that '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'.

- 2.23 The LDP is required to take account of the Community Plan and will provide a framework for the implementation of its vision and outcomes. Among the aims of the Community Plan is to create prosperous communities and a clean quality and sustainable environment, these in turn are achieved through identified secondary outcomes that include the levels of quality housing, economic investment and renewable energy.

### Cross Boundary Policy Context

- 2.24 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.
- 2.25 The table below offers a short summary of each Council's position with regards to the countryside assessment.

Neighbouring Council	Position
Ards and North Down Borough Council (ANDBC)	Ards and North Down Borough Council published its Preferred Options Paper <sup>10</sup> in March 2019. Issues relating to landscape fall within the section on Natural Environment which sets out the aim to 'To conserve, enhance and protect the natural environment of the Borough'. The Paper identifies the importance of Strangford Lough and how it forms part of an AONB which stretches into Newry, Mourne and Down. Key Issue 23 sets out that the Council's approach to protecting sites of international and national importance will be 'Adopt an approach in line with existing regional policy with regards to protecting and enhancing international and national conservation sites that are not LDP designations'. The paper does not provide an alternative approach as it states that this is the only possible approach given that the designation of such sites is outside the LDP process. Key Issue 24 relates to sites of local

<sup>10</sup> [Ards and North Down LDP - Preferred Options Paper](#)



	nature conservation and scenic landscape. The preferred option is 'Review local nature conservation sites and scenic landscapes and formulate appropriate accompanying policy for their protection and enhancement'.
Lisburn and Castlereagh City Borough Council (LCCBC)	Lisburn and Castlereagh City Council published its adopted Local development Plan in September 2023 <sup>11</sup> . Objective E of the Spatial Strategy is titled 'Protecting and Enhancing the Historic and Natural Environment,' it lists an objective to "Protect and enhance our designated natural heritage assets'. The designations listed include AONB's and AoHSV's. Strategic Policy 19 seeks to protect and enhance natural heritage and lists 4 criteria which all proposals must meet. The relevant operational policies are policies NH1-6 which set out policies for all designated sites within the district. The overall approach is to only permit proposals which will not have a significant adverse effect on the character of the site or harm its scenic quality of biodiversity.
Armagh City, Banbridge and Craigavon Brough Council (ABCBC)	Armagh City, Banbridge and Craigavon Borough Council published its Preferred Options Paper in March 2018 <sup>12</sup> . Key Issue ENV2 refers to sites of international and national importance which are designated outside of the LDP Process, for which the approach is to carry forward existing policy, and ENV for which the approach is to carry forward existing policy, review existing designations, and identify new areas for designation as appropriate.
Louth County Council, Republic of Ireland (LCC ROI)	Louth County Council published its Development Plan <sup>13</sup> in September 2021. Chapter 8 is entitled 'Natural Heritage,

<sup>11</sup> [Lisburn and Castlereagh LDP - Adopted Plan Strategy](#)

<sup>12</sup> [Armagh Banbridge Craigavon LDP - Preferred Options Paper](#)

<sup>13</sup> [Louth County Development Plan 2021-2027](#)

	Biodiversity and Green Infrastructure’, and sets out policies in relation to designated areas and landscapes. The approach Louth County Council has taken in relation to social infrastructure is to protect and preserve protected areas from inappropriate development while identifying potential new areas for designation.
Monaghan County Council	Monaghan County Council adopted an Interim Version of its Development Plan <sup>14</sup> on 26 May 2025. Chapter 6 is titled ‘Heritage, Conservation and Landscape’, it sets out policies for all designated sites and scenic landscapes. The overall approach is set out in Objective HCLSO1 ‘To promote and encourage the conservation and preservation of the County’s natural environment, cultural heritage and amenities in accordance with legislation, plans and policies developed to specifically address these areas and to ensure a rich cultural landscape, healthy environment and the full provision of ecosystems services in the County’. Operational Policy seeks to prevent developments which will have an adverse negative impact on designated sites and scenic landscapes.

- 2.26 The Council has engaged and responded to neighbouring Council’s POPs and draft or final Plan Strategies (where published). The Council is represented on a number of working groups to discuss cross-boundary issues and more broadly at the Development Plan Working Group.
- 2.27 In consideration of neighbouring Council’s development plan documents and discussions held with their officials, it is the opinion of the Council that no conflict is apparent with our draft Plan Strategy insofar as it is related to the Countryside Assessment.

### 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

<sup>14</sup> [Monaghan County Council - Development Plan 2025-2031 \(Interim Version\)](#)

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 A total of 16 thematic based Preparatory Papers<sup>15</sup> were prepared during the production of the POP. There was no paper specific to the countryside, instead relevant issues were contained within 8 of the papers. The relevant findings from each paper are summarised below.

### **Paper 6: Environmental Assets**

- 3.3 The district contains numerous features of the historic environment and natural heritage, many of these are afforded protected status under national and regional policies and international agreements. The LDP will identify these features and create a policy framework to balance the need to protect, preserve and enhance them whilst promoting sustainable economic development across the district.

### **Paper 7: Tourism**

- 3.4 In terms of tourism assets, the district:
- Benefits from a wealth of built, natural and cultural heritage assets including an unrivalled link to St Patrick which are strong incentives in attracting visitors.
  - Is a popular destination but primarily with domestic visitors from NI who visit the area for holiday/ pleasure/ leisure purposes.
  - Experiences a high number of visits however a lower-than-average number of nights are spent per stay and the lowest average spend per trip of all LGDs.
  - Is recognised for its adventure and outdoor based recreation and its world-renowned golf courses and further potential for growth exists particularly as this is a highly seasonal market.
  - Has the potential to grow boating and yachting opportunities that are currently limited by poor access to waterways and coastline.
  - Is strategically located between Belfast and Dublin and has port access at Warrenpoint which has further potential to attract the cruise market.
  - Had a small service room occupancy rate of 25% in 2024<sup>16</sup> and although it experiences lower than the NI average occupancy research has indicated that there is a need for additional accommodation in the district including a hotel in Downpatrick to enable visitors to stay and explore the Town and surrounding area.
- 3.5 The LDP will need to balance the safeguarding of these assets, particularly those in rural areas which are subject to protection with the need to develop

---

<sup>15</sup> [LDP Evidence Base](#)

<sup>16</sup> [NISRA - Small Service Occupancy Rates](#)

the infrastructure that will enable a greater number of tourists to access them.

## **Paper 8: The Coast**

- 3.6 In order to make provision for a changing coastline the Local Development Plan Strategy could therefore include measures to:
- Define the developed and undeveloped coast.
  - Define and designate a coastal policy zone (CPZ) covering both the developed and undeveloped coast. Within this adopt a high-level criteria-based policy on coastal erosion which would seek to ensure that:
    - Development proposals avoid areas vulnerable to coastal change.
    - Development proposals demonstrate the need for a coastal location.
    - In areas identified as vulnerable to coastal change, development proposals are accompanied by a coastal change vulnerability assessment.
    - An assessment on the impact of development on existing coastal defence infrastructure is provided, including whether new infrastructure is required; and
    - Proposals for new or replacement coastal defences are permitted where it can be demonstrated that they work with natural processes and there will be no significant adverse impact on coastal processes or habitats, and the development will not result in increased coastal erosion or flooding elsewhere on the coastline.
    - Define a coastal flooding zone and consider identifying coastal flooding zones and ascertain if the coastal flooding policy provision within PPS 15 is adequate; and
    - Direct new development within coastal settlements to the landward boundary of the settlement.
- 3.7 The LDP must also take account of other plans and strategies such as the Northern Ireland Marine Plan as well as the potential for offshore wind energy.

## **Paper 9: Public Utilities**

- 3.8 The district contains extensive upland areas which are either already utilised for public utilities e.g. the Mourne is a major source of freshwater for the Belfast Metropolitan Area, or which have the potential to be harnessed for the generation of renewable energy, either through wind turbines or solar/photovoltaic systems. The LDP will not designate specific zones for such uses but will seek to balance their provision against the need to protect landscape character and other assets from visual intrusion due to the

presence of such installations or the infrastructure needed to connect them to the electricity grid such as overhead lines and substations.

- 3.9 There is also the potential for the installation of Biomass energy plants more widely across the countryside, as well the potential need for new telecommunications infrastructure. The LDP will develop policies that will allow for such developments in a way that is balanced against the protection of the countryside and natural assets.

### **Paper 10: Open Space, Recreation and Leisure**

- 3.10 The district has a significant number of assets for public recreation, mostly located within settlement limits. Almost all settlements have formal children's play areas, and there are also several passive and informal play areas spread throughout the district.
- 3.11 Considering the policy approach of the SPPS, it is suggested that key actions of the local development plan at strategy level may include the following:
- (i) Provide policy for the protection and safeguarding for public open space.
  - (ii) The needs identified are taken account when formulating both the aims and objectives of the plan and future policy.
  - (iii) Provide adequate and well-designed open space in new housing developments as an integral part of the development.
  - (iv) Facilitate where possible large scale leisure proposals on opportunity sites within or near town centres and smaller scale proposal elsewhere within settlement limits.
  - (v) Protect environmental open spaces for example parks, gardens, and linear open space such as pedestrian and cycle routes/walkways and river corridors that have open space value.

### **Paper 11: Minerals**

- 3.12 The district contains extractable sources of several, commercially important minerals, the extraction of which is a significant part of the local economy and contributes towards the ability of the Northern Ireland economy to sustain and grow itself. The potential environmental cost of their extraction can affect natural assets and biodiversity which can potentially inhibit their ability to contribute to the local economy. Further research is needed so that the best approach for the LDP to take in relation to mineral extraction can be determined.

## **Paper 12: Landscape Character Analysis**

- 3.13 The district contains a diverse range of valuable landscapes, many of which are subjected to protected status such as the 3 Areas of Outstanding Natural Beauty (Ring of Gullion, Mourne and Strangford and Lecale), taken together with other designations, a significant proportion of the land area of the district is subjected to some level of protection.
- 3.14 The LDP process provides an opportunity for the Council to identify key features and assets of the countryside and to balance the needs of rural areas against the need to protect these features and assets. Specific policies have been formulated for the countryside as a whole and where there is sufficient justification, for specific areas or features.
- 3.15 The LDP has provided an opportunity to provide a single policy regime for the Mourne/Slieve Croob area which was previously divided between 2 different LDP's produced by different divisions of the former planning authority, as well as implementing a single coastal policy for the entirety of the district's coastline. These policies are set out in the relevant sections of the Plan Strategy.

## **Paper 13: Rural Pressure Analysis<sup>17</sup>**

- 3.16 The analysis has shown that the introduction of Planning Policy Statement 21 resulted in a significant reduction in the number of approvals for rural dwellings, there remain several pockets of development pressure such as in the southern part of the Mourne DEA and along the major roads that are not covered by the protected routes policy.
- 3.17 There has also been the growth of wind energy developments, mostly one-off turbines erected by landowners as opposed to large scale windfarms. These have been most noticeable in the northern portion of the Slieve Gullion DEA, which has an upland landscape suitable for wind energy, but which lies outside of the Ring of Gullion AONB. The number of such approvals has reduced significantly in recent years.

## **Preferred Options Paper**

- 3.18 The POP identified one key issue in relation to sensitive upland landscapes in the countryside.
- 3.19 Key Issue 22 – Sensitive Upland Landscapes highlights that the district's diverse landscapes are one of its key assets and that they should all be carefully managed and protected. The POP highlights regional policy guidance such as Policy RG11 of the RDS and the SPPS that require areas of the

---

<sup>17</sup> [Preparatory Paper 13](#)

countryside that exhibit exceptional landscapes such as mountains, development should only be permitted in exceptional circumstances. It also states that where appropriate such areas should be designated as Special Countryside Areas (SCAs).

- 3.20 Under the current local policy regime, the upland areas of the Mourne, Ring of Gullion and Slieve Croob were designated as SCAs in the Banbridge-Newry and Mourne Area Plan 2015. However the Mourne and Slieve Croob SCA's end at the former boundary with Down District Council, despite significant areas beyond the boundary demonstrating equally exceptional landscapes.
- 3.21 The preferred option in the POP in relation to Sensitive Upland Landscapes is to expand the SCAs to encompass sensitive landscapes in the former Down Council area and to review the operational policy that relates to them.
- 3.22 The preparation of the POP was also accompanied by a Preliminary Review of Operational Planning Policy (PRoPP) that evaluated the effectiveness of exiting policies in relation to landscape designations such as SCAs, LLPAs, AONBs and AoHSVs. Issues identified from operational experience were used to draft new versions of the policy to be included in the draft Plan Strategy.
- 3.23 KY22 was the subject of a single representation to the POP which while generally supportive of the Council's overall approach, argued that the 'Lower Western Foothills' of the Mourne SCA did not merit the designation.

## 4.0 Countryside Assessment

### 4.1 Environmental Assets Appraisal

- 4.1.1 The Environmental Assets Appraisal provides a catalogue of the various environmental resources within the district in order to assist with the designation of specific sites through the LDP. It is structured as follows:-
- **Natural Heritage Assets** – An overview of nature conservation and biodiversity resources;
  - **Historic Environment Assets** - Historical, architectural and archaeological resources, and;
  - **Landscape Assets** – An evaluation of landscape resources.

#### Natural Heritage Assets

- 4.1.2 This provides an overview of the natural heritage resources of the district and contributes to the overall evidence base that supports the LDP. It should also be read alongside the Council's Biodiversity Strategy 2024-2030<sup>18</sup>. The information contained within it has been sourced from Northern Ireland Environment Agency, (NIEA), the Department for Agriculture, Environment

---

<sup>18</sup> [NMDDC Biodiversity Strategy 2024-2030](#)

and Rural Affairs (DAERA)<sup>19</sup>, the Department for Infrastructure (DfI) and other sources where indicated.

- 4.1.3 Natural heritage sites fall into one of three categories in terms of their designation. Many of these designations will overlap with each other:
- **International** – Designations transposed into UK law through either European law (The Birds and Habitats Directives) or by ratifying international conventions (The RAMSAR Convention)
  - **National** – Designations contained within NI legislation such as The Wildlife (NI) Order 1985, or the Environment (NI) Order 2002, and;
  - **Local** – Designations that are applied by the Council either through the LDP or through powers granted by national legislation.

### International Designations

- 4.1.4 Special Protection Areas (SPAs) are designated under 'The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)'. Post transition the UK is still required to identify internationally important areas for breeding, over-wintering and migrating birds and designate them as Special Protection Areas (SPAs) in order to prevent the deterioration of their habitat. There are currently three SPAs within the district:
- Carlingford Lough SPA
  - Killough Bay SPA
  - Strangford Lough SPA
- 4.1.5 Special Areas of Conservation (SACs) are designated under the Habitats Directive. They have been designated because of a possible threat to the special habitats or species which they contain and to provide increased protection to a variety of animals, plants and habitats of importance to biodiversity both on a national and international scale. There are currently 11 SACs within the district:
1. Aughnadarragh Lough SAC
  2. Ballykilbeg SAC
  3. Derryleckagh SAC
  4. Eastern Mourne SAC
  5. Hollymount SAC
  6. Lecale Fens SAC
  7. Murlough SAC
  8. Rostrevor Wood SAC
  9. Slieve Gullion SAC
  10. Strangford Lough SAC
  11. Turmennan SAC
- 4.1.6 Ramsar Sites are designated under The Convention on Wetlands (the Ramsar Convention), an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise

---

<sup>19</sup> [DAERA - Protected Areas](#)



use of wetlands and their resources. This recognises wetlands as ecosystems that are extremely important for biodiversity conservation in general and for the well-being of human communities. There are currently four Ramsar sites within the district:

1. Carlingford Lough Ramsar Site
2. Killough Bay Ramsar Site
3. Strangford Lough Ramsar Site
4. Turmennan Ramsar Site.

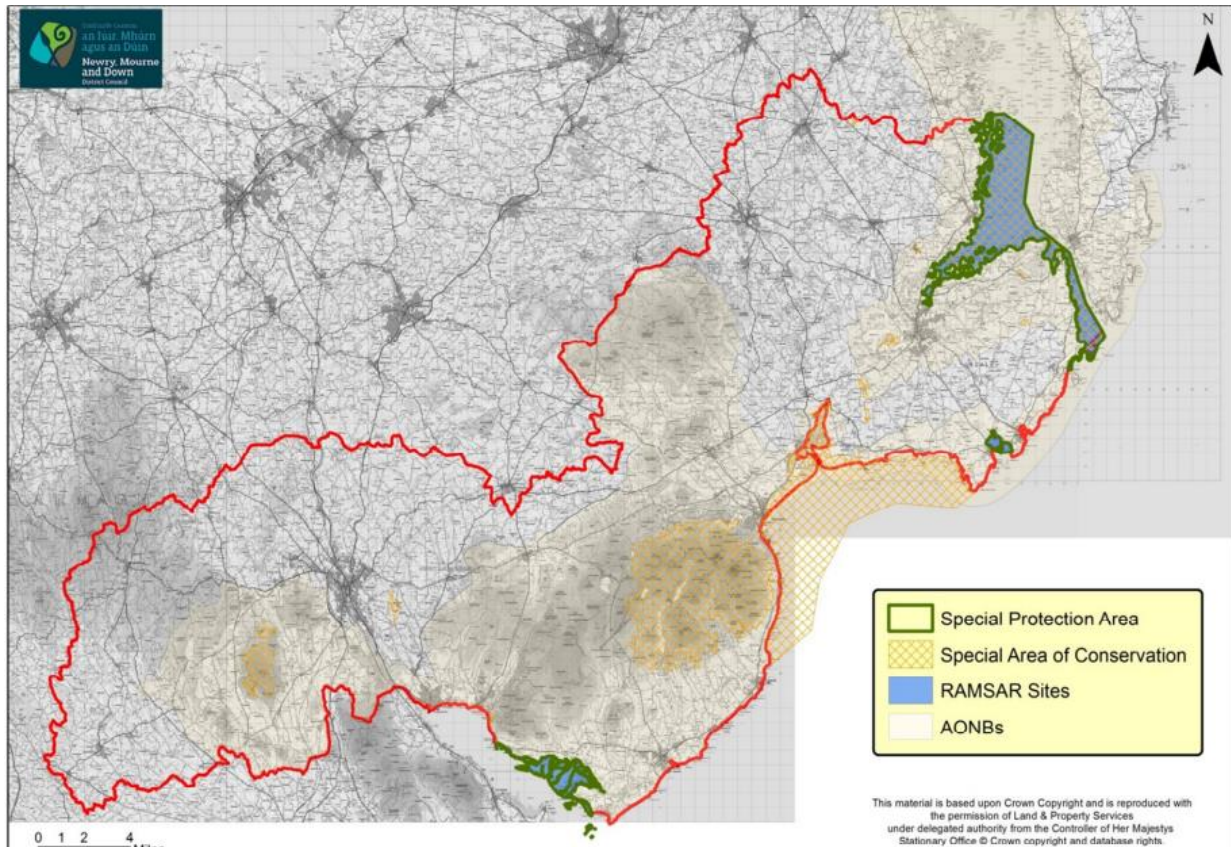


Figure 1: SACs, SPAs, Ramsar Sites and AONBs

## National Designations

4.1.7 Areas of Special Scientific Interest (ASSIs) represent the very best examples of Northern Ireland's impressive natural heritage, and within them may be found our most important, rare or threatened habitats and species or geological features. They are designated under the Environment (Northern Ireland) Order 2002 (as amended). There are currently 62 ASSIs within the district:

1. Ardglass ASSI
2. Aughdarragh Lough ASSI
3. Aughnagon Quarry ASSI
4. Ballybannan ASSI
5. Ballycam ASSI
6. Ballykillbeg ASSI
7. Ballynagross Lower ASSI

8. Black Lough ASSI
9. Cam Lough ASSI
10. Camlough Quarry ASSI
11. Carlingford Lough ASSI
12. Carrickasticken ASSI
13. Carrivemaclone ASSI
14. Carrowcarlin ASSI
15. Cashel Loughs ASSI
16. Castle Enigan ASSI
17. Castlewellan Lake ASSI
18. Clermont and Angelsey Mountain ASSI
19. Cloghinny ASSI
20. Corbally ASSI
21. Derryleckagh ASSI
22. Drumlougher Lough ASSI
23. Eastern Mourne ASSI
24. Fathom Upper ASSI
25. Glendesha ASSI
26. Goraghwood Quarry ASSI
27. Gransha ASSI
28. Greenan ASSI
29. Greenan Lough ASSI
30. Gruggandoo ASSI
31. Heron and Carrigullian ASSI
32. Hollymount ASSI
33. Kilbroney ASSI
34. Kilkeel Steps ASSI
35. Killard ASSI
36. Killough Bay and Strand Lough ASSI
37. Levallymore ASSI
38. Lislea ASSI
39. Loughaveely ASSI
40. Loughkeelan ASSI
41. Loughmoney ASSI
42. Lurgan Lough ASSI
43. Mourne Coast ASSI
44. Mullaghbane ASSI
45. Murlough ASSI
46. Quoile ASSI
47. Rostrevor Wood ASSI
48. Samuel's Port ASSI
49. Sheepland Coast ASSI
50. Shimna River ASSI
51. Slieve Croob ASSI
52. Slieve Gullion ASSI
53. St John's Point ASSI
54. Strangford Lough Part 2 ASSI
55. Strangford Lough Part 3 ASSI

- 56. Tullyard ASSI
- 57. Tullyratty ASSI
- 58. Turmennan ASSI
- 59. Tyrella and Minerstown ASSI
- 60. Western Mourne and Kilfeaghan Upper ASSI
- 61. White Water River ASSI
- 62. Woodgrange ASSI

4.1.8 Areas of Scientific Interest (ASI's) are designated under the Amenity Lands Act (Northern Ireland) 1965 because of the importance of their flora, fauna, geological or physiographical or other features. These designations merely amount to lines on maps and there are no protective legislative or policy provisions for them, where they have been superseded by ASSI or SLNCI designations it is suggested that they will not be replicated on the new LDP.

There are currently two ASIs within the district:

- 1. Mourne Coast ASI
- 2. South Mourne Coast ASI

4.1.9 National Nature Reserves/Nature Reserves (NNR/NRs) are designated under the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985. A National Nature Reserve is defined as an area of land designated by government because of its national importance for flora, fauna and/or geological features of special interest. A Nature Reserve is interpreted as any area reserved, managed and used for the purpose of:

- a) conserving flora, fauna or features of geological, physiographical or other scientific or special interest therein; or
- b) providing, under suitable conditions and control, special opportunities for the study of, and research into, matters relating to flora and fauna and the physical conditions in which they live, or for the study of features of geological, physiographical or other scientific or special interest therein;
- c) or for both of those purposes.

4.1.10 There are currently seven NNR/NRs within the district:

- 1. Bohill Forest NR
- 2. Cloghy NR
- 3. Hollymount Forest NNR
- 4. Killard NNR
- 5. Murlough NR
- 6. Quoile Pondage Basin NR
- 7. Rostrevor Forest NR

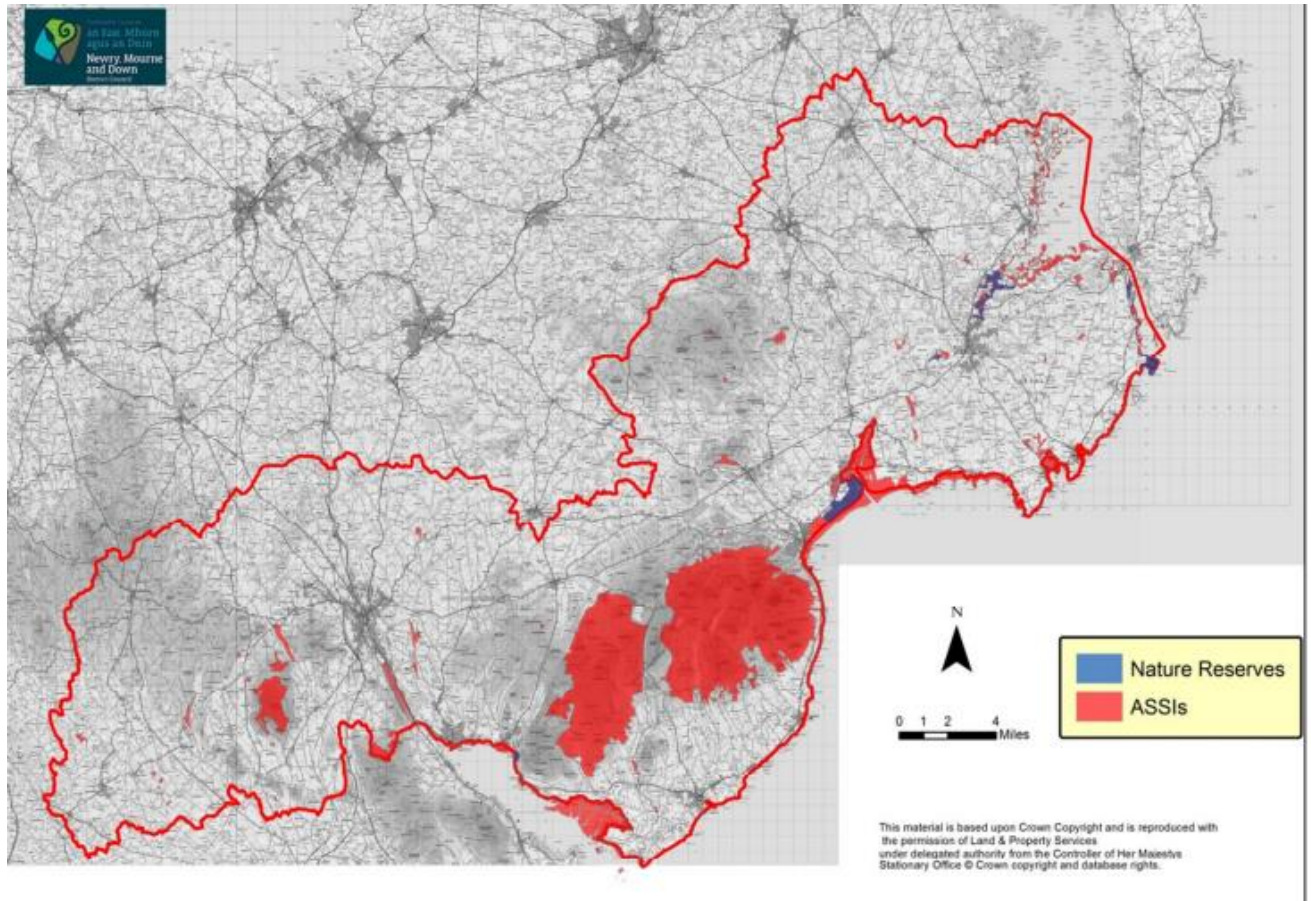


Figure 2: ASSIs and Nature Reserves

4.1.11 Areas of Outstanding Natural Beauty (AONB's) are also designated under the Nature Conservation and Amenity Lands (NI) Order 1985, primarily for their high landscape quality, wildlife importance and rich cultural and architectural heritage. There are currently three AONBs within the district:

1. Mourne AONB (designated 1986)
2. Ring of Gullion AONB (designated 1991)
3. Strangford and Lecale AONB (designated 2010)



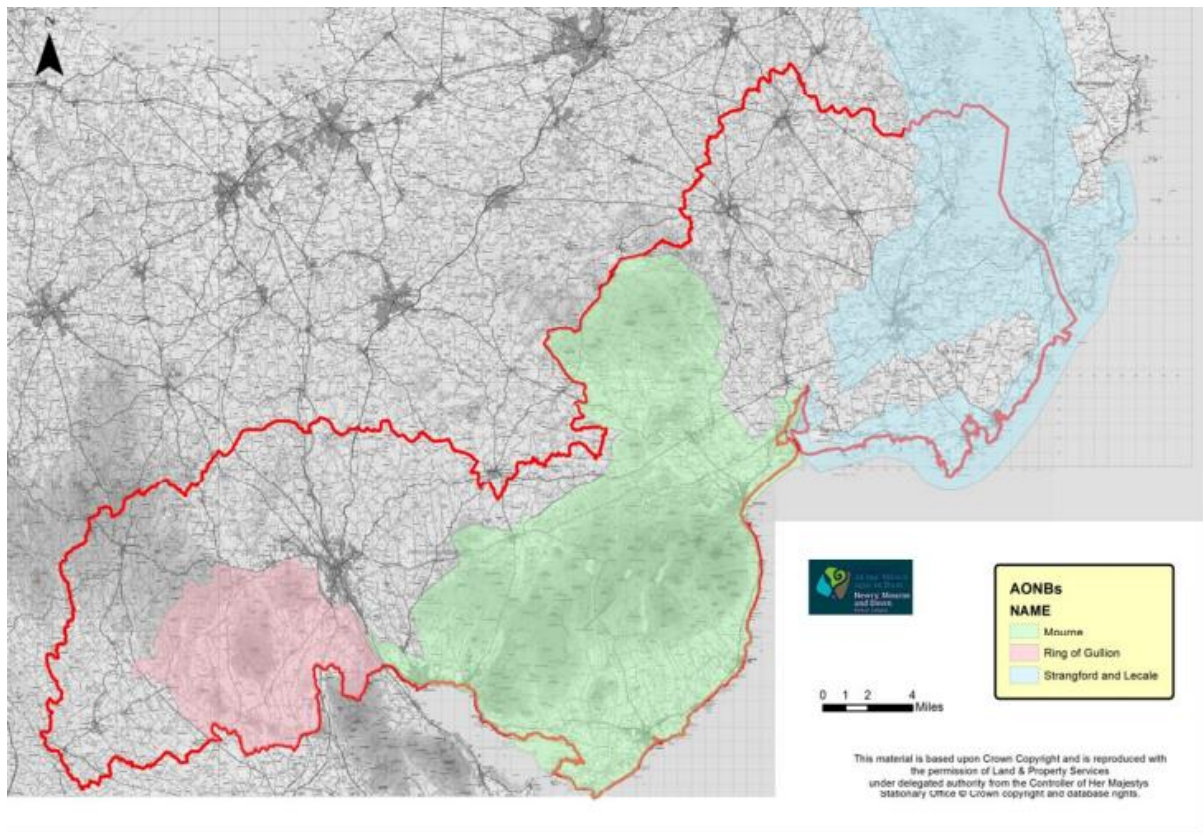


Figure 3: Areas of Outstanding Natural Beauty

4.1.11 Marine Conservation Zones (MCZ) are designated under the Marine Act (NI) 2013, to safeguard vulnerable or unique habitats and species of national importance in the Northern Ireland inshore region (within 12 miles of the coast). MCZs form part of the NI Marine Protected Network (Marine SPA, SAC, Ramsar and ASSI). There are currently two MCZ's within the district.

1. Carlingford Lough MCZ
2. Strangford Lough MCZ

## Local Designations

4.1.12 Sites of Local Nature Conservation Importance (SLNCIs) are designated for their habitats, species and or earth science. As well as making a contribution to the local natural heritage, they contribute to National and European biodiversity. Their location is identified through the relevant Area Plan, detailed descriptions of their characteristics are provided in the Countryside Assessment supplement.

4.1.13 There are currently 187 SLNCIs in the district.

1. Aghadavoyle Ponds
2. Aghanduff Lower Mountain
3. Aghmakane Fen
4. Aghmakane Fen South
5. Aghmakane Fen West
6. Altnadua Lough

7. Altnadua Lough
8. Anglesey Mountain
9. Annaghgad Grassland
10. Annaghmare Lough
11. Annalong River
12. Annesley Demesne
13. Ardglass
14. Ardglass - Cloghan Head
15. Ardglass - Ringfad Point
16. Ardglass Bay
17. Ardmeen Fen
18. Attical Moraine Complex
19. Aughadanove
20. Aughanduff Upper Mountain
21. Aughnagon Quarry
22. Ballintate Woodland
23. Ballybeg Fen
24. Ballydugan Lake
25. Ballydyan
26. Ballygallum Ponds
27. Ballylough Grasslands
28. Ballymacdermot Mountain
29. Ballymagreehan Quarry
30. Ballymartin Moraine incorporating Ballyveagh Beg
31. Ballymenagh Fen Site
32. Ballynoe Fen Site
33. Ballyvaston
34. Bernish Rock
35. Bessbrook
36. Betty's Hill Fen
37. Black Hill
38. Bohill
39. Bow Lough
40. Brookvale Bog and Lough
41. Bunarilla
42. Burren Lowlands incorporating Donaghaguy Reservoir
43. Burren, Shimna and Trassey Rivers
44. Camlough Mountain
45. Canal Wood
46. Cappagh Lough Fen and Cappagh Grassland
47. Carnally Fen North
48. Carnally Fen South
49. Carnally Grassland
50. Carran Fen
51. Carrickastickan Grassland
52. Carrickbawn
53. Carrickbawn Wood
54. Carrickbroad

55. Carrickmacstay
56. Carrickmannon Lough
57. Carrigans Grassland
58. Carrogs - Carnbane Wood and Daisy Hill Wood (both within Newry City)
59. Cashel
60. Cassy Water
61. Castlemahon Fen
62. Claragh Lough
63. Clarkill
64. Clea Lakes
65. Cloghoge
66. Clonalig Lough
67. Clontygora
68. Commons Hall Road
69. Cornahove Lough
70. Greenkill Grassland
71. Creeve
72. Creevy Lough and Rocks
73. Creggan Bane Fen
74. Coreagh, Newry
75. Crosslieve
76. Crosslieve Pond Fen
77. Crossmaglen Fen
78. Crossmaglen North Fen
79. Cullion Fen
80. Cullyhanna Lough
81. Cullywater
82. Cuttyshane Bog
83. Damolly
84. Derryleckagh Lake
85. Dorsy
86. Dorsy Hearty Fen
87. Downpatrick Marshes
88. Drin Wood
89. Dromantine College
90. Drumantine Grassland
91. Drumboy Lough
92. Drumgooland Lake
93. Drumilly
94. Drumintee
95. Drummackavale Lough
96. Drummilt Railway, Lough Gilly and Dane's Lough
97. Dublin Road Bridge
98. Duburren Pastures
99. Dundrum Wood
100. Dunnanelly
101. Eshwary Fen
102. Fathom Lower Woods and Grasslands

103. Flagstaff
104. Foughilletra East and Foughellitra Mountain
105. Foughilletra Fen
106. Gargarry Fen
107. Garvagh Lough
108. Ghann River
109. Glassdrumman
110. Glassdrumman Fen
111. Glassdrumman Fen and Lake
112. Glassdrumman Lough
113. Glebe House, Rathmullan
114. Goragh Wood and Goraghwood Quarry
115. Granite View
116. Gransha
117. Great Dam
118. Greenan Wood
119. Hawthorn Hill
120. Hawthorn Hill Upper
121. Jonesborough Fen and Grasslands
122. Kilbroney Park
123. Killeen Fen North
124. Kiltybane Lough
125. Knocksticken
126. Lecale Coast
127. Leesans Cottage
128. Levallymore Grassland
129. Lisamry Lough
130. Lisleitrim Lough
131. Longfield Grassland
132. Longfield Road
133. Lough Alina
134. Lough Money
135. Lough Patrick
136. Lough Ross
137. Loughinisland
138. Loughran's Lane
139. Lurgan Lough
140. Magheracranmoney Wood
141. Magheralone
142. Maginnis Villas
143. McAuley's Lake
144. Mill Pond
145. Milltown Lough
146. Moneycarragh River
147. Mourne Park incorporating White Water River and Cranfield Moraine
148. Mullaghbane Mountain
149. Mullartown Moraine
150. Narrow Water Forest



151. Pollramer Lake
152. Portulla Wood
153. Rathmullan Point
154. Rathmullan West
155. Ringawaddy Reedbed
156. Rostrevor River
157. Sandy Port
158. Seaconnell
159. Seaforde Lakes
160. Shague Hill
161. Sheeptown Fen
162. Sheetrim Lough
163. Silverbridge
164. Slieve Croob
165. Slieve Croob
166. Slievegullion Grassland
167. Slievenaboley Road
168. Slievenacappel
169. Slievenagriddle
170. South Down Coast
171. Spelga Dam incorporating Spelga Dam Stream
172. St John's Point
173. St. Pious Hill
174. Tamary
175. Tamnaghbane
176. Tannaghmore Reservoir
177. Teer
178. Tievecrom
179. Tullydonnell Grassland
180. Tullynacree
181. Tullyratty
182. Tullyree
183. Tyrella/Minerstown
184. Ummeracam
185. Upper Burren Lake and Fen
186. Western Mourne Habitat and Geology incorporating Rocky Mountain
187. Yates Corner

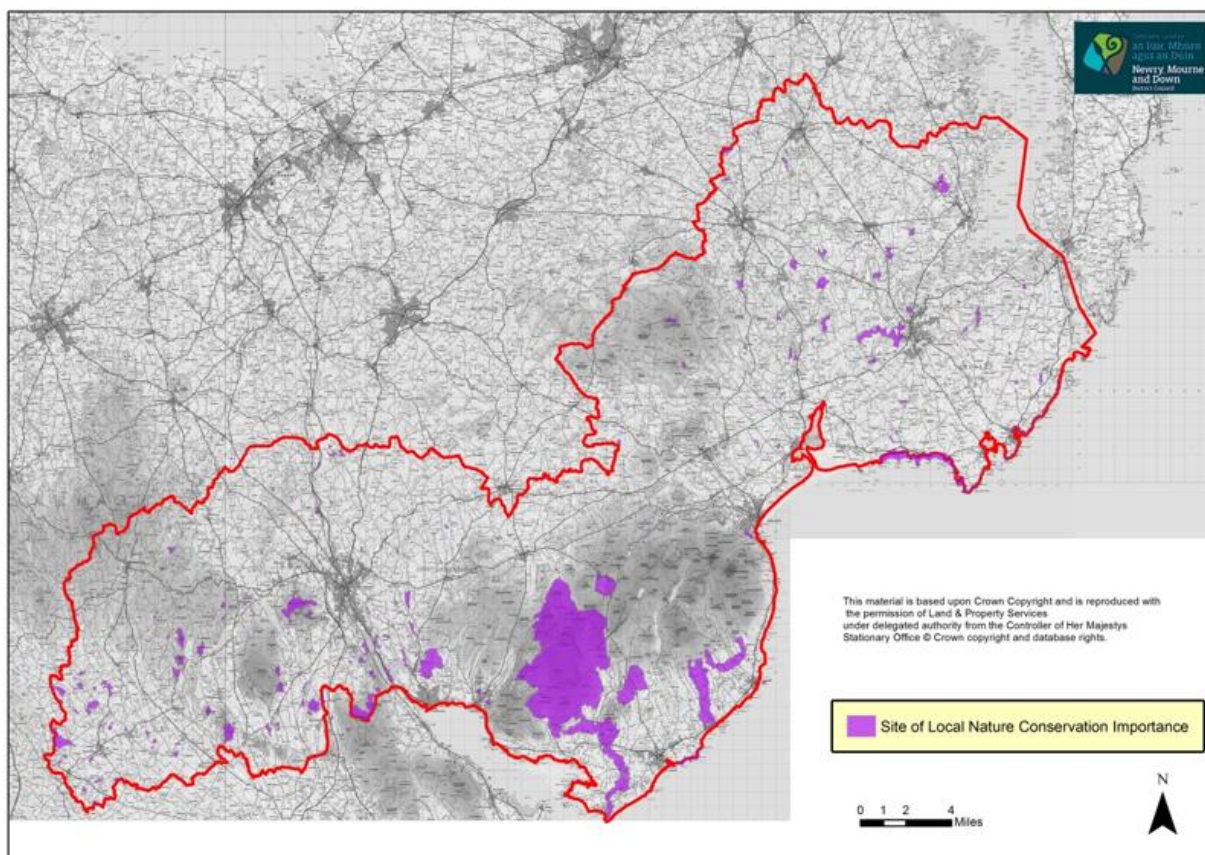


Figure 4 Sites of Local Nature Conservation Interest

### Historic Environment Assets

4.1.14 This section provides an overview of the historic environment assets of the district, it contributes to the overall evidence base that supports the LDP. The information contained within it has been sourced from Historic Environments Division (HED), the Department for Communities (DfC) and other sources where indicated.

### Historic Monuments in State Care

4.1.15 Archaeological sites and monuments are taken into the guardianship of the Department of the Environment (DOE) under the Historic Monuments and Archaeological Objects (NI) Order 1995. State care sites and monuments represent all periods of human settlement in Ireland from around 7,000BC to the 20th century, include some of the premier examples of monument types in Northern Ireland. Historic Monuments in State Care within the district include pre-historic Ballynoe Stone Circle, the Neolithic King's Ring and Court Tomb in Clontygora, late medieval Narrow Water Castle in Warrenpoint and 14th Century Ringhaddy Church.

4.1.16 Monuments in State Care have many values, they are a tangible link to our past and hold information on how our predecessors lived, and for this reason they are fascinating places to visit. They are also located in both rural and urban environments, and as such, State Care Monuments often provide

important habitats for wildlife that may not survive in the surrounding area. State care sites are also used as an important educational tool as some facilitate educational programmes and events.

### **Scheduled Monuments**

- 4.1.17 Under the Historic Monuments and Archaeological Objects (NI) Order 1995 the Department for Communities (DfC) has a duty to compile and maintain a schedule of monuments. Monuments on the schedule have statutory protection and inclusion is at DfC's discretion. In practice most proposals for scheduling originate within HED and consultation is required with the Historic Monuments Council before a monument is added to or removed from the schedule. They include sites dating from 7000 BC to the 20th century such as prehistoric tombs, earthworks of all kinds, castles, churches, maritime sites, canals and World War 2 defences.

### **Unscheduled Monuments**

- 4.1.18 Large numbers of known archaeological sites are likely to remain unscheduled and whether or not they are preserved will depend on the value of the remains, the commitment of the owners and the public and the policies of public agencies.
- 4.1.19 In excess of 2,000 archaeological sites and monuments are recorded across the district. These include historic monuments in state care, scheduled and unscheduled monuments.

### **Listed Buildings**

- 4.1.20 Article 80 of the Planning Act (Northern Ireland) 2011 requires the Department to compile a list of buildings of special architectural or historic interest. Such buildings are important for their intrinsic value and for their contribution to the character and quality of settlements and the open countryside of Northern Ireland.
- 4.1.21 There are approximately 1,427 Listed Buildings within the district<sup>20</sup>.

### **Historic Parks, Gardens and Demesnes**

- 4.1.22 The character and appearance of the modern landscape of Northern Ireland owes much to ornamental parks and gardens associated with our country houses, institutions and public parks. For over three centuries they have been an important feature of the countryside. Many are distinguished by their carefully composed design of trees, meadow and water, perhaps as a setting for a building; some boast a valuable collection of trees, shrubs or plants;

---

<sup>20</sup> [HED - Buildings Database](#)

others may provide a significant historic record, either of a particular era or showing how the design has changed over the centuries. Aside from their contribution to the quality and character of our local landscape, those that are open to the public provide an important recreational resource. However, it is a fragile heritage, for unlike other works of art, these gardens and designed landscapes are living, growing and evolving. As such they need careful management. NIEA has prepared a register of parks, gardens and demesnes of special historic interest in Northern Ireland, there are 34 within the district, these are listed below:

1. Ballyedmond
2. Ballytrim
3. Ballyward Lodge
4. Castleward
5. Castlewellan Castle
6. Crossgar House (Tobar Mhuire)
7. Delamont
8. Derrymore House and The Woodhouse
9. Dromantine House
10. Drumbanagher
11. Finnebrogue House
12. Green Park
13. Hawthorne Hill
14. Kilbroney (The Lodge)
15. Killyleagh Castle
16. Monalto House
17. Mount Panther
18. Mourne Park
19. Myra Castle
20. Narrow Water Castle
21. Rademon
22. Ringdufferin
23. Rostrevor House
24. Rowallane
25. Saintfield House
26. Seaforde House
27. Tollymore Park
28. Tyrella House
29. Warrenpoint Park

4.1.23 The following are listed as Supplementary Sites.

1. Ballymoyer
2. Ballee House
3. Ballydugan House
4. Church Hill
5. Forkhill House

## Industrial Heritage

4.1.24 HED holds and updates a record of industrial heritage sites, including features such as former railway structures, viaducts and mill buildings. Some of these may have been lost or only retain a few elements of their original form. The most important sites are afforded statutory protection as archaeological sites or listed buildings. There are approximately 1,536 Industrial Heritage sites within the district.

## Areas of Significant Archaeological Potential and Areas of Archaeological Potential

4.1.25 Areas of Significant Archaeological Interest identify particularly distinctive areas of the historic landscape in Northern Ireland. Development Plans in consultation with HED will, where appropriate, designate these areas. They are likely to include a number of individual and related sites and monuments and may also be distinguished by their landscape, character and topography. Development plans will also highlight, for the information of prospective developers, those areas within the historic cores of towns and villages, where, on the basis of current knowledge, it is likely that archaeological remains will be encountered in the course of continuing development and change. These will be referred to as Areas of Archaeological Potential.

4.1.26 There are three Areas of Significant Archaeological Potential within the District:<sup>21</sup>

1. The Dorsey
2. Downpatrick
3. Dundrum

There are two candidate Areas of Significant Archaeological Potential at Slieve Gullion and Greencastle.

4.1.27 There are 29 designated Areas of Archaeological Potential within the district<sup>22</sup>:

1. Annalong
2. Ardglass
3. Attical
4. Ballynahinch
5. Ballyward
6. Belleek
7. Camlough
8. Castlewellan
9. Clough
10. Creggan
11. Crossmaglen
12. Cullaville

---

<sup>21</sup> [HED - Archaeology](#)

<sup>22</sup> [HED - ASAI](#)

13. Cullyhanna
14. Dechomet
15. Downpatrick
16. Forkhill
17. Hilltown
18. Jerretspass
19. Kilclief
20. Kilkeel
21. Killowen
22. Killyleagh
23. Mayobridge
24. Newcastle
25. Newry
26. Newtownhamilton
27. Rostrevor
28. Saintfield
29. Strangford

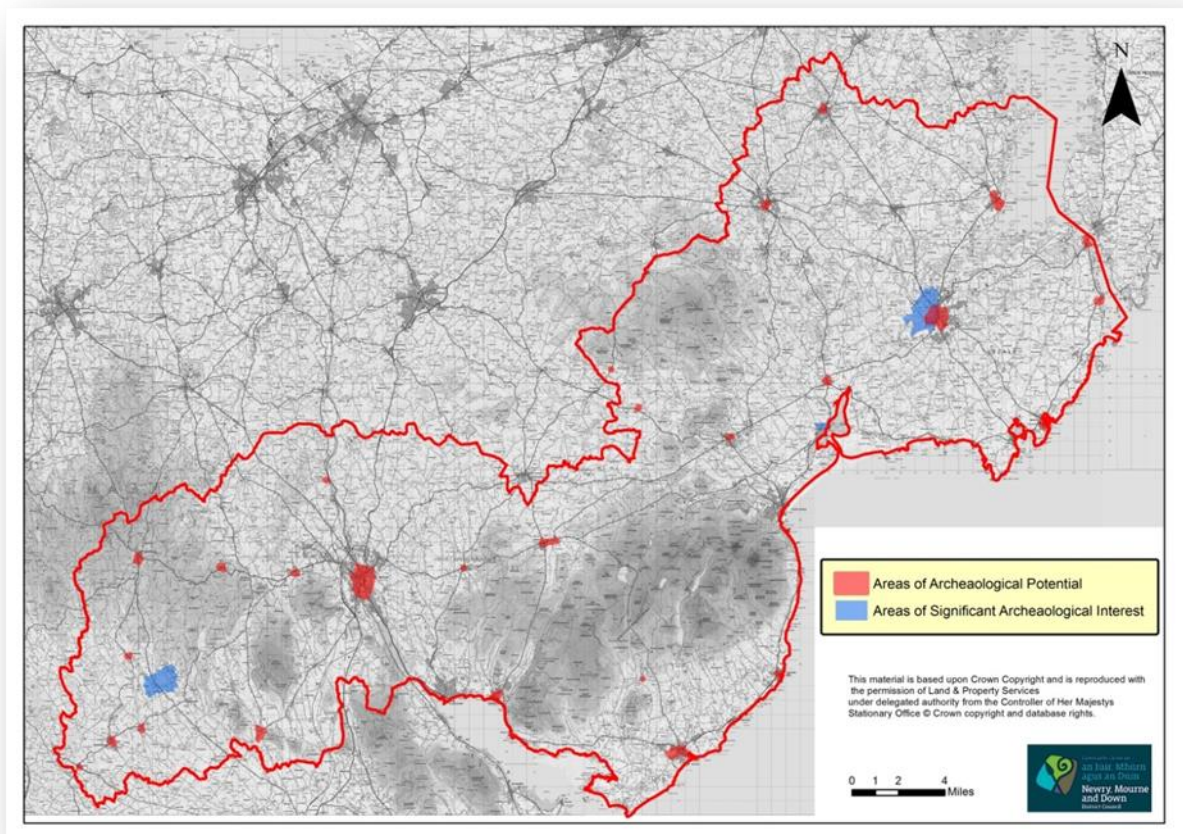


Figure 5: Areas of Significant Archaeological Potential and Areas of Archaeological Potential



## Conservation Areas

- 4.1.28 The Planning Act (NI) 2011 (Section 104) provides the Council with the power to designate an area of special architectural or historic interest as a Conservation Area. Details of each designated Conservation Area are specified within the relevant Development Plan and specific townscape and design advice can be found in the relevant designation booklets. There are currently 10 Conservation Areas within the district:
1. Ardglass - designated June 1996
  2. Bessbrook - designated October 1983
  3. Castlewellan - designated December 1992
  4. Downpatrick - designated March 1985
  5. Killough - designated March 1981
  6. Killyleagh - designated March 1993
  7. Newry - designated May 1983
  8. Rostrevor - designated February 1979
  9. Saintfield - designated February 1997
  10. Strangford - designated September 1985

## Areas of Townscape Character

- 4.1.29 Many cities, towns and villages contain areas which exhibit a distinct character and intrinsic qualities, often based on their historic built form or layout. Some of these have merited statutory designation as Conservation Areas by virtue of their special architectural or historic interest. For others, recognition as Areas of Townscape Character (ATCs) has been judged to be more appropriate, larger settlements often have multiple such areas within them.
- 4.1.30 There are currently 27 ATCs within the district, the settlements they are located in are listed below with the numbers of ATCs within them indicated in brackets:
1. Annalong (1)
  2. Bessbrook (2)
  3. Bryansford (1)
  4. Crossmaglen (1)
  5. Dundrum (1)
  6. Forkhill (1)
  7. Hilltown (1)
  8. Jerrettspass (1)
  9. Kilkeel (1)
  10. Leitrim (1)
  11. Newcastle (1)
  12. Newry City (10)
  13. Rostrevor (2)
  14. Seaforde (1)
  15. Warrenpoint/Burren (2)

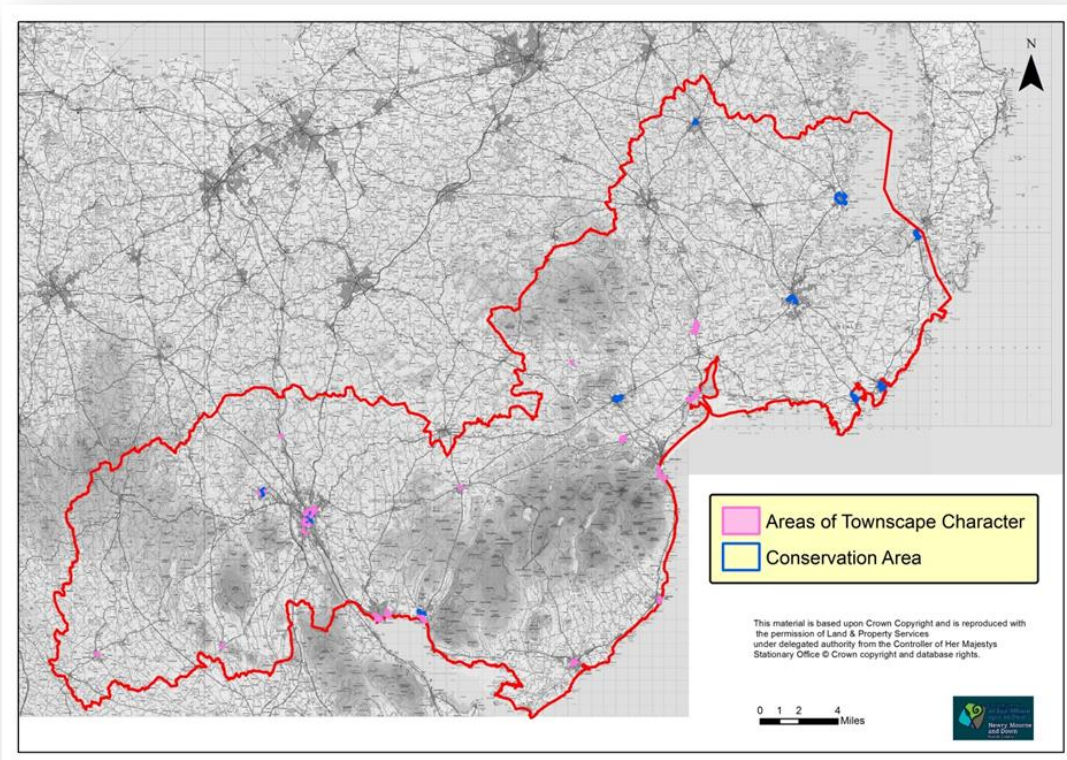


Figure 6: Areas of Townscape Character and Conservation Areas

## Landscape Assets

### Local Landscape Policy Areas (LLPAs)

4.1.31 LLPAs are environmental assets identified through the Countryside Assessment and other studies. These consist of those features and areas within, and adjoining settlements considered to be of greatest amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development.

They may include:

- archaeological sites and monuments and their surroundings;
- listed and other locally important buildings and their surroundings;
- river banks and shore lines and associated public access;
- attractive vistas, localised hills and other areas of local amenity importance; and
- areas of local nature conservation interest, including areas of woodland and important tree groups.

4.1.32 There are currently 216 LLPAs within the district that were designated through the Ards and Down (ADAP) and Banbridge, Newry and Mourne Area Plans (BNMAP):



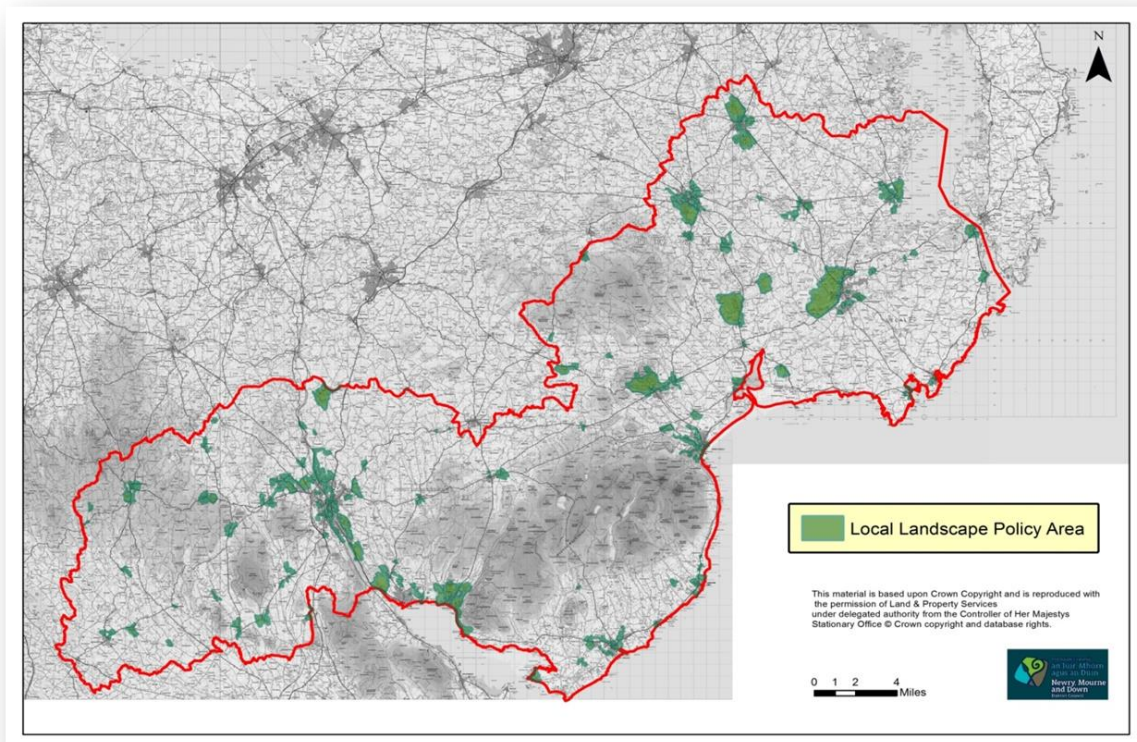


Figure 7: Local Landscape Policy Areas

### Area of High Scenic Value (AoHSV)

- 4.1.33 The District contains a single AoHSV at Magheraknock Loughs which was designated in the Ards and Down Area Plan 2015, it is part of a larger area that extends into Lisburn and Castlereagh City Council area.

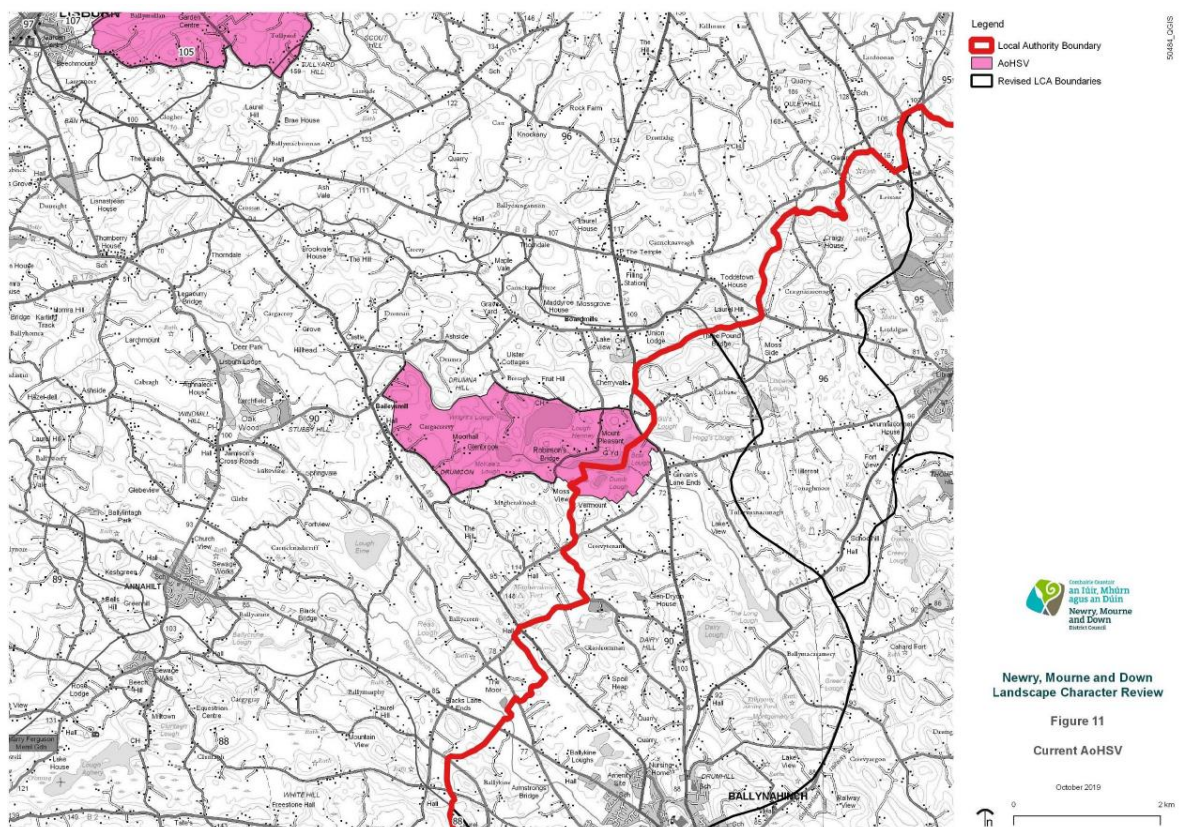


Figure 8: Magheraknock Loughs Area of High Scenic Value (Source Ironside Farrar Landscape Assessment 2020)

## Special Countryside Areas

4.1.34 Special Countryside Areas (SCAs) are areas of countryside designated through the LDP, that provides stricter policy control to manage development in sensitive landscapes which are vulnerable to excessive development pressure. There are currently three SCAs within the district which were originally designated as 'AONB Zone A' in the Banbridge Rural Area and Newry and Mourne Rural Area Subject Plans, before being redesignated as SCAs by PPS21:

1. Mournes
2. Ring of Gullion
3. Slieve Croob

4.1.35 The current SCAs are shown below in cross hatched green. The Landscape Character Review recommends that the Mournes and Slieve Croob SCAs be extended into the former Down District Council Area to address an anomaly where despite the areas in question having identical landscape characteristics to the designated SCAs, they were not afforded the same designation due to them having been within a separate LDP.



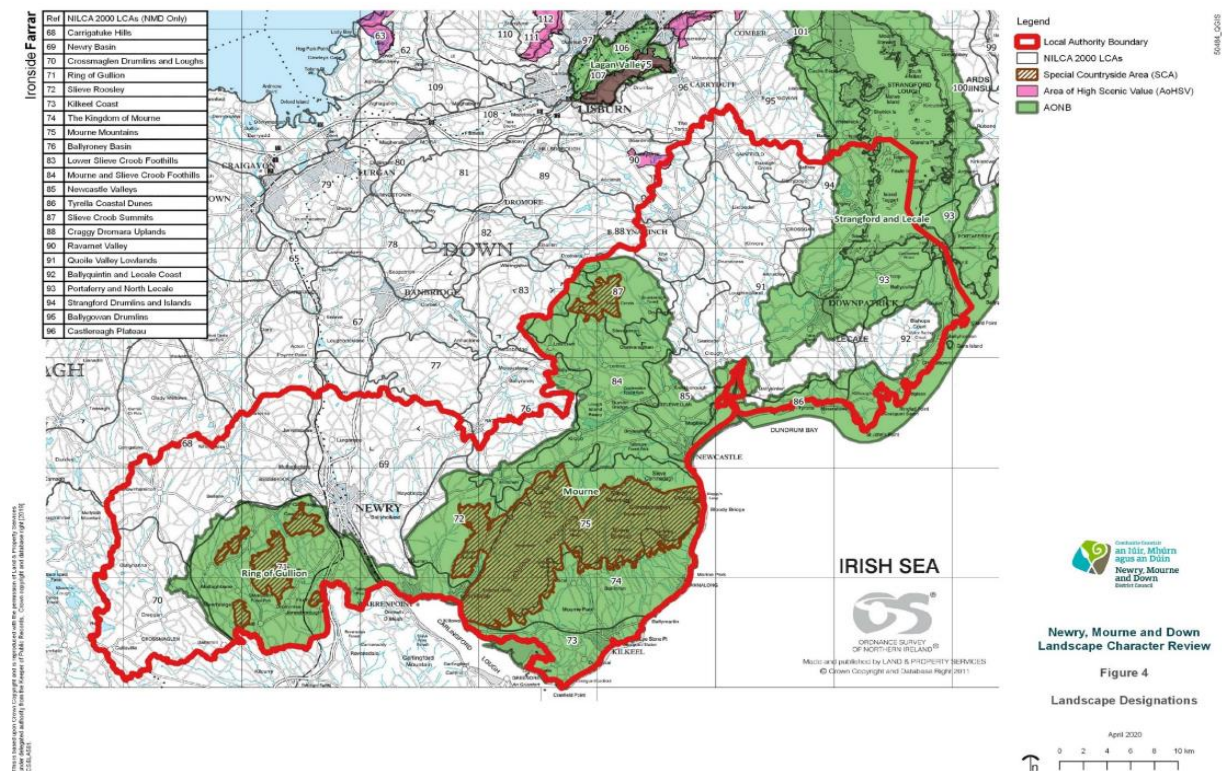


Figure 9: Existing SCAs (Source Ironside Farrar Landscape Assessment 2020)

## Mourne Gullion Strangford UNESCO Global Geopark

- 4.1.36 The existing AONBs of the District are now designated as a Global Geopark by UNESCO in recognition of their unique geology, landscapes and cultural features. The land boundary of the Geopark follows the Newry, Mourne and Down District Council administrative boundary. The coastal boundary encompasses the Marine Protected Areas (MPA), including Murlough Bay, Strangford Lough and Carlingford Lough MPAs.<sup>23</sup>

## 4.2 Landscape Assessment

### Landscape Character Review – Executive Summary<sup>24</sup>

- 4.2.1 The landscape character of Northern Ireland is described in the Northern Ireland Landscape Character Assessment which was undertaken in 1999 (NILCA 2000)<sup>25</sup>. The assessment describes the Northern Irish landscape through 130 landscape character areas (LCAs). 25 LCAs are wholly or in part within the Newry, Mourne and Down District Council Area, albeit 3 only marginally. The character assessment describes the character of each area, its sensitivity, condition and provides principles for landscape and development management. More recently, information on the biodiversity

<sup>23</sup> [Newry Mourne and Down Council - UNESCO Geopark](#)

<sup>24</sup> Appendix 7A [Newry Mourne and Down Landscape Character Review October 2020](#)

<sup>25</sup> [NILCA](#)

and geodiversity of each LCA was added to the assessment, and these are available on the Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA) website, along with the character assessment.

- 4.2.2 In the years since the publication of the original assessment, parts of the landscape of Newry, Mourne and Down have been subject to significant change. For the character assessment to remain relevant to planning policy and the development management process, an update of the landscape and associated assessments is required to capture the current landscape character and its sensitivities, and to provide up to date development management guidance.
- 4.2.3 Furthermore, the landscapes of Newry, Mourne and Down are some of the most scenic in Ireland, including Carlingford Lough, Strangford Lough, the Ring of Gullion, and the Mourne Mountains, with their special qualities recognised through national and local landscape designation. There is a requirement to make sure that designations, in particular local designations, properly reflect the special landscape qualities and remain relevant to objectives set out in planning policy.
- 4.2.4 Ironside Farrar was commissioned in 2019 by the District Council to undertake a review and update of the character assessment within Newry, Mourne and Down, including updating of the biodiversity and geodiversity profiles which accompany each character assessment, and a review of local landscape designations. This summary describes a brief description of the findings of the review and the updated landscape character assessment for the Newry, Mourne and Down District Council Area.
- 4.2.5 The updated landscape character assessment is complementary to the Northern Ireland Regional Landscape Character Assessment (NIRLCA)<sup>26</sup> and the Northern Ireland Regional Seascape Character Assessment (NIRSCA)<sup>27</sup>, published in 2016 and 2014 respectively, which characterise the landscape and seascape of Northern Ireland at a larger scale.
- 4.2.6 The Landscape Character Assessment is set out in **Appendix 7A**.

### **Aim and Methodology**

- 4.2.7 The Landscape Character Review is intended to build upon and review the work carried out by DAERA in the Northern Ireland Landscape Character Assessment 2000. It seeks to provide a more up to date landscape record in view of recent trends in planning applications and where necessary it recommends alterations to the boundaries of the Landscape Character Areas (LCAs) designated by that assessment.

---

<sup>26</sup> [DAERA- NIRLCA Map Viewer](#)

<sup>27</sup> [NIRSCA](#)

- 4.2.8 The methodology is done with reference to "*An Approach to Landscape Character Assessment*" (Natural England, 2014), and consists of 2 steps:
- Step 1: the identification, description, and classification of areas of distinctive landscape character. The starting point being the existing LCAs which are then reclassified into Landscape Character Types (LCTs); and
  - Step 2: making judgements as to the potential sensitivity of landscapes to certain types of development to assist in the determination of planning applications.

### Settlement Assessments

- 4.2.9 Settlement assessments describe the development patterns and landscape settings of key settlements. The purpose of these assessments is to define the key landscape issues which should guide future development of the settlements.

- 4.2.10 At the request of the Council, assessments were carried out on the following settlements.

- Newry
- Downpatrick
- Newcastle
- Warrenpoint
- Kilkeel
- Ballynahinch
- Saintfield
- Killyleagh
- Castlewellan
- Crossmaglen

### Main Features of the Revised Landscape Character Assessment

- 4.2.11 Ironside Farrar made several observations while carrying out the assessment, the main observation is the use of LCTs that consist of groups of LCAs, often not contiguous with each other but often consisting of similar landscape forms despite being geographically separate from each other. The LCTs proposed, and the LCAs they are derived from are listed below:

- Lowland Drumlin Farmland: Newry (69), Crossmaglen (70), River Bann (76), Newcastle (85), Ravernet River (90), Quoile River (91), Saintfield (95): The most commonly occurring landscape character type within Newry, Mourne and Down comprising low lying undulating drumlin farmland within broad river and lough basins.
- Loughs and Drumlins – Strangford (94): The partially submerged landscape of sunken drumlins at Strangford Lough and its setting.
- Coastal Plain – Kilkeel (73), Ballyquintin and Lecale (92): Flat pastoral hinterlands ending in the low, rocky coastline of the Irish Sea.

- Elevated Drumlin Farmland – Dromara (88), Castlereagh Plateau (96): More elevated areas of drumlin pasture located above broad, lowland river valleys or transitioning to more upland landscapes.
- Inclined Coastal Pastures: The Kingdom of Mourne (74): An area of unique landscape character comprising farmland with distinctive walled boundaries on the southern slopes of the Mourne Mountains extending to the coast.
- Lowland Hills: Carrigatuke (68), North Lecale (93): Distinct low hills to the west and east of the District Council area, separate from the main upland areas of the Mourne Mountains and Slieve Croob.
- Farmed Foothills: Slieve Roosley (72), Lower Slieve Croob (83), Mourne (84): Lower foothills and higher ground at the fringes of the Mourne Mountains and Slieve Croob.
- Rugged Uplands: Mourne Mountains (75), Slieve Croob (87): The upland landscapes of the Mourne Mountains and the outlying Slieve Croob, with many hill summits above 500m AOD, up to 853m at Slieve Donard.
- Volcanic Hills: Ring of Gullion (71): The distinctive and unique ring dyke system in South Armagh, comprising a series of peaks centred on Slieve Gullion rising from lowland farmland.
- Coastal Dunes: Tyrella (86): An area of sandy coastline with extensive dunes, backed by farmland.

## Biodiversity Profile Review

4.2.12 The review was an entirely desk-based exercise based upon a number of sources, the following broad trends were identified;

- Woodland: There appears to have been a slight increase in the woodland cover in the district in recent years, mostly down to the planting of new woodlands on previously farmed land. The overall woodland cover was estimated at 5.15% although this excludes smaller patches of woodland and scrub habitat.
- Agricultural Land: Despite incomplete spatial information, the amount of agricultural land in the district appears to be similar to that measured in 2006. A noticeable reduction in land classed as "Hill or Rough Land" was discernible.
- Heath, bog, fen and wetland: Appears to be broadly unchanged.
- Species: Information on several species is lacking but trends appear to be similar to the rest of the region. Bird numbers show similar changes with 9 commoner species showing an increase and 10 in decline.
- Agri-environment and Forestry Grant Schemes: Support to landowners and managers through Agri-environment schemes is currently provided via the Environmental Farming Scheme (EFS) which runs until 2020 and is administered by DAERA. There are a range of EFS options targeting biodiversity enhancement and the uptake of these measures, and future similar measures, should be encouraged.

## **Geological Characteristics Review**

- 4.2.13 Since the completion of the Ironside Farrar Review, the Council's application to UNESCO to establish the Mourne Gullion Strangford Geopark has been successful. The Geopark will play an important part in the Council's efforts to attract tourism, landscapes and other important geological features within the Geopark will be afforded sufficient protection through the LDP policies.

## **Settlement Assessments**

- 4.2.14 Ironside Farrar carried out assessments on the 10 largest settlements in the district.

### **Newry**

- 4.2.15 Newry is both the largest settlement in the district and its only city, it has a superb setting in a valley bounded to the west by Camlough Mountain, which lies within the Ring of Gullion AONB and a lower ridgeline to the east. As a result of this setting Newry has grown traditionally in a North-South axis, particularly towards the higher ground to the north due to the more favourable topography. The A1 dual carriageway runs along the western side of the city and provides a natural boundary, the topography to the east and west of the city limits the potential for expansion especially as it is argued that any new development should be along the contours of the land and should preserve existing hedgerows. The prevention of coalescence with the villages of Bessbrook and Camlough to the west should be prevented.

### **Downpatrick**

- 4.2.16 Downpatrick has a very distinctive and historic setting, based around the cathedral set on a hilltop in its centre. The town is situated in drumlin landscape beside the River Quoile, the low-lying lands to the west of the centre form part of the river's flood plain and as a result the traditional pattern of development has been for expansion to the north, east and south. It is recommended that future development avoids the areas near the Quoile estuary and Strangford Lough, as well as preserving the long-range views of the cathedral and other historic buildings and features with the town.

### **Newcastle**

- 4.2.17 Newcastle has a dramatic natural setting at the base of Slieve Donard, this has traditionally contained its development into a narrow band along the coast. However, in recent years suburban housing developments have occurred in the Shimna, Burren and Tullybrannigan river corridors. The importance of tourism in the town's economy is reflected by the presence of several caravan parks along the coast. Potential for future development to the west is limited by the need to preserve the lower slopes of Slieve Donard and



to prevent the possibility of coalescence with Bryansford. Development to the north must consider the need to preserve the setting of the Murlough Dunes.

### **Warrenpoint**

- 4.2.18 Warrenpoint is a major commercial port that occupies a dramatic setting at the head of Carlingford Lough. The gateway to the town from the north is marked by Narrow Water Castle and Estate as well as the views of the port, to the north of the town there is a large industrial estate at Burren/Milltown, adjacent to this is the village of Burren itself. The coast road from Warrenpoint through Rostrevor to Kilkeel is an important and attractive tourist route, care should be taken with the choice of materials to maintain its distinctiveness, as well as to maintain the separation of Warrenpoint from Rostrevor as well as from Burren. Overall, there is a risk that further suburban development could spill beyond the ridges that currently provide a backdrop to the town and into the undulating landscape beyond.

### **Kilkeel**

- 4.2.19 Kilkeel is a major fishing port, its harbour is set at the confluence of the Kilkeel and Aughrim rivers both of which flow through the town. It is set on a wide coastal plain between the eastern slopes of the Mourne and the coast, this results in both long range views of the town and few constraints on expansion which has resulted in a series of outlying suburbs and pockets of development. Future development should seek to avoid ribbon development along the main roads and should be accompanied by a programme of tree planting along the settlement fringe to help it integrate better into its setting.

### **Ballynahinch**

- 4.2.20 Ballynahinch is a market town set within drumlin landscape, much of its development has occurred on the lower slopes of drumlins, the Monalto Estate provides a wooded backdrop. The main constraints on development have been, the topography of the drumlins, a large quarry to the north of the town and the Ballynahinch River Corridor. Future development should aim to preserve the impression of "a settlement set among drumlins," avoiding the area around the quarry and seeking to create a river corridor into the centre of the settlement.

### **Saintfield**

- 4.2.21 Saintfield is a compact settlement set amongst drumlins, the National Trust property at Rowallane is situated on its southern boundary. This compact form is largely a result of its drumlin setting which has constrained the spread of the settlement. It is recommended that new development be small in scale and located within the valleys between drumlins, large scale development creates a risk of development being physically separated from the settlement by the drumlins.



## **Killyleagh**

- 4.2.22 Killyleagh is situated within Drumlin landscape to the west of Strangford Lough, the undulating landscape has created the impression of a separation between the historic core based around Killyleagh Castle and the quay and harbour, and the newer developments to the south. There are few physical constraints to development in this direction, but this could potentially increase the sense of detachment. Protecting the setting of Strangford Lough and preventing coalescence with the settlement of Shrigley should also be objectives for new development.

## **Castlewellan**

- 4.2.23 Castlewellan is a market town that is situated in a hilltop location which results in it, and St Malachy's Church in particular, being prominent in the landscape on the approaches along the A25 into the town from both directions. Castlewellan Forest Park, a major tourism and recreation asset, provides a strong backdrop to the north of the town and this constraints opportunities for development in this location. The town centre has a distinctive and formal layout with two squares in a linear pattern along the A25, development has traditionally occurred towards the south due to the lack of physical constraints in this area. However further expansion in this direction could result in development occurring on the upper slopes of the Burren River Valley, woodland planting to mitigate the visual impact of such development is recommended. As is preventing development on prominent slopes to the east of the town as well as preventing coalescence with the small settlement of Annsborough.

## **Crossmaglen**

- 4.2.24 Crossmaglen is a market town close to the Border with the Republic of Ireland. It has a historic core based around The Square which developed at a crossroads, subsequent development has largely been compact although there has been a tendency to ribboning along the main roads leading to the settlement. Future development should aim to consolidate the existing form of the settlement as well as retaining existing mature trees.

## **Local Landscape Designations Review**

### **Special Countryside Areas**

- 4.2.25 The SPPS and PPS21 require Councils to identify those areas of exceptional landscape quality and amenity value and designate them as Special Countryside Areas (SCAs), the current regional policy states that development should only be permitted in these areas in exceptional circumstances.
- 4.2.26 Under the extant LDP's SCAs are designated for the Ring of Gullion, Slieve Croob and the Mourne, none have been designated in the former Down

District Council Area, resulting in the former district boundary marking a boundary of both the Slieve Croob and Mourne SPA. Therefore, the review has recommended the extension of these boundaries to include upland areas similar to those in the existing SCAs.

### **Areas of High Scenic Value**

4.2.27 The Ards and Down Area Plan 2015 identified an AoHSV within the Ravernet River Valley centred around the Magheraknock Loughs, the majority of this area lies within the area of Lisburn and Castlereagh District Council, it is also designated as a Site of Local Nature Conservation Interest (SLNCI). The review recommended that the area within NMD be de-designated as an AoHSV as while it has scenic value and natural heritage interest, it is not accessible to the public and is not publicised as a tourist asset. However, it is considered that retaining the designation will protect the integrity of the entire AoHSV.

### **Landscape Condition and Forces for Change**

#### **Landscape Condition**

4.2.28 Many lowland areas have been affected by the piecemeal development of new housing, lowland pastures are generally well-maintained transitioning to poorer quality on upland slopes, some of which are infested with scrub and rush. Fly tipping is a significant problem in the district, especially on isolated rural roads.

#### **Forces for Change**

- 4.2.29 The main forces for change on landscape character are summarised below: -
- Agriculture: Gradual changes in farming practice have resulted in the loss of traditional stone walls or hedgerows. Some upland areas show the effects of grazing while pollution from agricultural run-off can affect sensitive wetland habitats.
  - Trees and woodland; Continuing pressure from commercial forestry operations.
  - Development: There have been significant levels of housebuilding outside of settlement limits, especially in lowland areas however some has occurred on higher slopes.
  - Minerals: Requirements for minerals due to market pressures may result in demand for new quarries or the reopening of existing sites.
  - Tall structures: There have been several approvals for telecommunications stations and for wind turbines, the latter have generally been as one-off developments but there is a risk of cumulative developments affecting particular localities.
  - Roads: The Newry Southern Relief Road scheme is proposed to be constructed on the steep escarpment on the southwestern side of Newry, has the potential to be significantly prominent in the landscape.

- Tourism and Recreation; There are several opportunities for tourism development at locations such as Camlough Lake and the Ring of Gullion. Care will need to be taken to ensure that these do not adversely affect landscape character.

## 4.3 Development Pressure Analysis

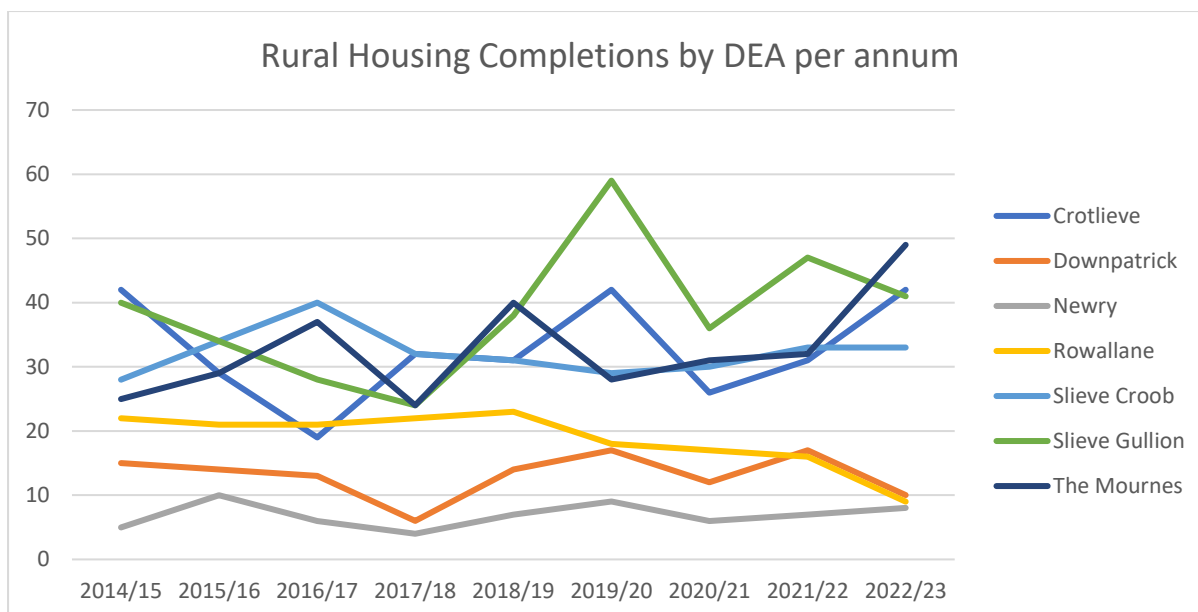
### Introduction

- 4.3.1 The Development Pressure Analysis (DPA) seeks to identify those areas of the district that have or are experiencing significant development pressures, with the result that local landscape character is at risk of being eroded, in order to determine if they may benefit from additional designations and a stronger rural policy approach.
- 4.3.2 Development pressure in the countryside has traditionally been caused by approvals for residential development, with agricultural/forestry development having a significantly lower effect overall, however in recent years the increased uptake of renewable energy projects, in particular wind energy, has created significant visual impact in areas that are particularly suited for such developments.

### Source of Information

- 4.3.3 The data for the DPA has been sourced from the Department of Infrastructure's planning statistics bulletins and has been where necessary augmented by searches of the Planning Portal. The data covers completions of rural dwellings in the period from 1 April 2014, up until 31 March 2023 The analysis provides an updated position from that identified in Preparatory Paper 13.<sup>i</sup>

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Crotlieve	42	29	19	32	31	42	26	31	42
Downpatrick	15	14	13	6	14	17	12	17	10
Newry	5	10	6	4	7	9	6	7	8
Rowallane	22	21	21	22	23	18	17	16	9
Slieve Croob	28	34	40	32	31	29	30	33	33
Slieve Gullion	40	34	28	24	38	59	36	47	41
The Mournes	25	29	37	24	40	28	31	32	49



### Summary

4.3.4 From the figures shown above it can be seen that the number of Rural Housing Completions per annum in the district increased from 177 in 2014/2015 to 192 in 2022/23, an increase of 8.47% over the period. The peak year was 2019/2020 with a total of 202 completions, the lowest total was 144 recorded in 2017/18.

4.3.5 The lowest per annum totals were recorded in the predominantly urban District Electoral Areas (DEAs) of Downpatrick and Newry, the DEA that saw the biggest increase in per annum completions was The Mournes which saw an increase of 96% over the period. In contrast Rowallane DEA experienced a per annum decrease of 59% over the period.

4.3.6 In terms of cumulative completions per DEA the totals were;

- Slieve Gullion 347 units
- The Mourne 295 units
- Crotlieve 294 units
- Slieve Croob 290 units
- Rowallane 169 units
- Downpatrick 118 units
- Newry 62 units

4.3.7 These figures are in line with the development patterns identified in Preparatory Paper 13, with the southern parts of the district receiving the highest development pressure. As the Pressure Analysis maps contained within the Preparatory Paper highlighted, there is considerable variation within the DEAs with the greatest pressure often found close to the main settlements such as Crossmaglen, Castlewellan and Hilltown or along main roads, while upland areas, such as the High Mournes and Slieve Gullion remaining largely unspoilt due to the high level of protection afforded to them

and their inaccessibility which makes developing sites unfeasible. This has the effect of further concentrating development in low lying areas which are not as protected or as constrained as others.

### **Analysis of Renewable Energy Development**

- 4.3.8 Increasing the use of renewable energies was detailed as an objective within the Regional Development Strategy (RDS) for Northern Ireland 2035. The RDS refers to the Strategic Energy Framework for Northern Ireland (DETI 2010) which sets targets of 40% electricity consumption from renewable sources by 2020, current target is to have 80% renewable generation by 2030.<sup>28</sup>
- 4.3.9 This analysis is based on figures published in the DfI's yearly planning statistical tables from 2014-15 to 2023-24 in relation to applications for renewable energy systems that have been decided by the Council.<sup>29</sup>
- 4.3.10 Prior to the publication of PPS18 Renewable Energy, applications for wind energy development were primarily assessed under the Planning Strategy for Rural Northern Ireland and in-particular Policy PSU 12. However, following a change in direction in all Government policy as outlined above, a more permissive renewable energy policy was introduced through PPS18. This together with several government subsidy schemes which were being rolled out explains the initial high numbers of applications and approvals for wind energy development.
- 4.3.11 The accompanying Table 1 indicates a low level of applications for renewable energy systems in the district since the transfer of planning responsibilities in April 2015. The number of decisions for renewable energy systems peaked at 48 in 2014-15 falling to 3 in 2023-24, the majority of applications for renewable systems in the district have been single wind turbines often associated with individual farm enterprises. The fall in application numbers is likely a reflection of several areas reaching the threshold at which turbines can be accommodated in the landscape and further applications will be contrary to the cumulative impact tests set out in Policy RED1 of PPS18. In addition, stricter levels of control apply in the AONB's which cover almost 55% of the land area of the district and this correspondingly limits the amount of suitable sites.
- 4.3.12 As outlined in Paragraph 1.9 of the Review of Renewable and Low Carbon Energy,<sup>30</sup> consideration must be given as to whether certain areas within the district should be identified specifically for wind energy development. The Council considers that as the pressure for renewable energy development is

---

<sup>28</sup> [SONI - Shaping Our Electricity Future](#)

<sup>29</sup> [DfI - Planning Activity Statistics](#)

<sup>30</sup> [Revised Regional Strategic Planning Policy on Renewable and Low Carbon Energy](#)

low, as demonstrated by Table 1 below, therefore there is no justification for designating such areas.

**Table 1 Planning Decisions for Renewable Energy Projects, Newry, Mourne & Down District Council**

<b>Year</b>	<b>Approvals</b>	<b>Refusals</b>	<b>Totals</b>
2014-2015	21	27	48
2015-2016	26	10	46
2016-2017	20	17	37
2017-2018	2	9	11
2018-2019	4	1	5
2019-2020	1	2	3
2020-2021	2	2	4
2021-2022	7	1	8
2022-2023	5	1	6
2023-2024	3	0	3
<b>Totals</b>	<b>91</b>	<b>70</b>	<b>161</b>

#### **4.4 Settlement Appraisals**

- 4.4.1 As part of the LDP preparation process, appraisals have been carried out of all settlements within the district in order to review their positions within the Settlement Hierarchies that were part of the Ards and Down and Banbridge, Newry and Mourne Area Plans, in light of the implementation of planning approvals, changes in regional and strategic policy or infrastructure improvements, in order to determine if the settlements have developed to a level that would justify their inclusion in a different part of the hierarchy, whether they no longer merit formal designation as a settlement or to identify potential new settlements.
- 4.4.2 The purpose of the appraisals is also to provide a baseline for decisions in relation to Statutory Development Limits and other designations such as land use zonings, that will be carried out during the preparation of the Local Policies Plan.
- 4.4.3 The appraisals consisted of both desk-based research exercises to provide historic background on each settlement as well as details of physical constraints such as flood risk as well as statutory designations e.g. ASSI. Details of transport links such as the frequency of bus services was also identified together with the nearest primary school and other community facilities, as well as planning histories for significant developments that have occurred within each settlement since the adoption of the extant plans. In addition, physical surveys were carried out on each settlement by members of the LDP Team to establish if there were any other issues or constraints that were not evident from the desk-based research.

4.4.4 Regional policy as set out in the RDS and SPPS seeks to consolidate development into settlements to protect the countryside as a resource, villages and small settlements can serve as potential locations for tourism and economic development proposals that can provide jobs and incomes for these communities as well as new services to enable their development in appropriate forms. The Plan Strategy sets out policies to enable the implementation of such developments.

4.4.5 The Strategic Settlement Appraisal is set out in **Appendix 7B**.

## **5.0 Consultee and Councillor Engagement**

- 5.1 The development of the Draft Plan Strategy has facilitated the input of elected members, Development Management and Enforcement Staff, representatives of other Council Departments, as well from DfI and other statutory agencies to try and ensure that the draft policies meet both the definitions of sustainable development and soundness that are set out in the SPPS.
- 5.2 All of the Draft Policies have been subjected to a Sustainability Appraisal with Shared Environmental Services, comments received during this appraisal were used to improve the wording of the policies ahead of their publication.
- 5.3 Drafts of Policies LA1 – LA4 were presented to the Council’s Planning Committee on 10 March 2022, which were subsequently endorsed by the Committee.
- 5.4 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 Policy Approach**

- 6.1 The Draft Plan Strategy builds upon and updates the existing policies on the Countryside contained in the Planning Policy Statements and the current LDPs. The policies set out will protect the district’s most sensitive landscapes from inappropriate developments while meeting the needs of local residents.
- 6.2 The Draft Plan Strategy is an important component of the LDP and it will play an important role in implementing regional planning policy in the district and supporting the Council’s Corporate and Community Plans. The vision for the LDP set out in Chapter 4 recognises the importance of supporting, conserving and enhancing the sensitive landscapes of the district.



## Overarching Strategic Policies and Strategic Growth Strategy

- 6.3 Part 1 of the Draft Plan Strategy sets out a number of strategic policies and a Strategic Growth Strategy in support of its aims and objectives, these in turn link into the operational policies contained within Part 2.
- 6.4 Part 1 also contains the Countryside Strategy which seeks to facilitate sustainable development in the countryside whilst balancing this against the need to protect and conserve the countryside, recognising it as a unique and valuable resource.
- 6.5 The Countryside Strategy also contains Strategic Policy CS1 – Development in the Countryside. This sets out a range of both residential and non-residential development types that are considered to be acceptable in the countryside and will further the aim of sustainable development. Details of the operational policies relating to the types of developments considered to be acceptable are discussed under the relevant Technical Supplements.
- 6.6 A coastal development strategy (CDS1) is set out in Part 1. This indicates that the Plan will support development proposals which protect the undeveloped coast from inappropriate development, consistent with GP1 General Policy. To protect the existing character of the undeveloped coast the Plan Strategy will restrict inappropriate development that would have a diminishing effect on the landscape and seascape in accordance with Policy CO1.

## Operational Policies

- 6.7 Part 2 of the Draft Plan Strategy sets out the operational planning policies, as well as specific policies on individual issues. It also contains a General Policy GP1, which applies to all developments;  
*“Planning permission will be granted for development proposals where the development accords with the policies and proposals as set out in the Plan Strategy and provided there is no unacceptable adverse impact in relation to the following criteria:*  
*... 4. Landscape, Seascape and Townscape Character*
- Development proposals should have no unacceptable adverse impact on visual amenity, landscape, seascape or townscape quality, local distinctiveness and/or inherent character of the locality.*
- 6.8 The Justification and Amplification section of the Policy highlights that new developments should be sited and designed so as to integrate into their surroundings. In all cases, where there is likely to be a significant visual impact, applicants will have to provide Landscape and Visual Impact Assessments that identify the critical viewpoints, particularly in relation to sites intended to be located in prominent or ridgeline locations.

- 6.9 A total of 4 subject policies relating to Landscape are set out, headed Policies LA1-LA4. The policies largely update the legacy policies from the current LDPs to reflect the current regional planning policy and the changes to Planning implemented through the Review of Public Administration. They also take into account the LDP Aims and Objectives and the Key Issues identified in the POP.
- 6.10 Some parts of the district's countryside contain such exceptional landscapes (such as the High Mourne) where the quality of the landscape and unique amenity value is so high that development should only be permitted in exceptional circumstances. Policy LA1 Special Countryside Areas seeks to protect these landscapes by ensuring that planning permission within a Special Countryside Area (SCA) will only be permitted in certain limited circumstances. The Council commissioned a Landscape Character Assessment in 2019 to capture the current landscape character and its sensitivities. This assessment considered the extent of the current SCA designation and suggested that its coverage be extended to incorporate additional parts of the Mourne and Slieve Croob. The Strategy has carried forward the existing SCA designation with extensions as per the additional areas identified with the LCA report.
- 6.11 The Strategy sets out policy for the protection of the undeveloped coast under Policy CO1. This states that there will be a presumption against all new development within the undeveloped coastal zone other than in exceptional circumstances. The policy sets out eight exceptional circumstances where development may be permitted and indicates where a proposal doesn't meet the exceptional circumstances but is considered to be of national or regional economic importance it may likewise be acceptable.
- 6.12 Designation CO1 sets out the extent of the undeveloped coast. The undeveloped coast designation extends along the full extent of the district's coast from the Council boundary north of Killyleagh to Carlingford Lough and the Newry River to the start of the Greenbank Industrial Estate.
- 6.13 The identification of the boundary of the undeveloped coast followed a detailed methodology as set out below:

- a. The outer edge of the undeveloped coast tracks the low water mark in line with the limit of the terrestrial planning regime;
  - b. The extent and inner edge of the undeveloped coast has been informed by a range of considerations:
    - i) The intertidal area is included within the coastal zone. This includes extensive mudflats such as those located at Ardglass, Dundrum Bay, and Carlingford Lough (south of Kilowen);
    - ii) The low lying nature of the coast and the risk from rising sea levels and storm events. The extent of 5 metre and 10 metre contours was considered with the 5 metre contour considered to be a minimum below which any development would be incorporated into the coastal zone;
    - iii) Protected sites. The undeveloped coast takes account of the spatial extent of International Sites (Ramsar Sites, SPA, SAC) National Sites (NNR/NR, ASSI) but not those parts that represent significant landward extensions;
    - iv) The undeveloped coast takes account of spatial extent of our coastal SLNCIs designated through the current Area Plans;
    - v) Exposed headlands and similar coastal projections are incorporated into the coastal zone;
    - vi) Unmaintained land adjoining the shoreline would be generally incorporated, some maintained fields incorporated dependant on their proximity to shoreline and open aspect of the coast;
    - vii) Existing development above the 5 metre contour is brought within the coastal zone dependant on its proximity to the coastal edge and open aspect (low lying and/or rising slowly from shoreline, limited/no vegetation). Any development incorporated within the undeveloped coastal zone would generally be sporadic, significant clusters of residential development and holiday/caravan parks would be excluded; and
    - viii) The boundary of the inner edge of the undeveloped coastal zone follows a physical feature where feasible: road lines, field boundaries, mature/well established vegetation, shoreline edge etc. Where there are no physical features to align the boundary with, in close proximity to contours/env designations, then the boundary is generally set back 50 metres from the shoreline.
- 6.14 Within the Strategy Policy CO2 sets out the approach to the developed coast. This indicates that proposals for development with an existing harbour, port or marina will be required to demonstrate that they require a harbour/port/marina location or are ancillary to activities taking place there; will not adversely affect the commercial viability or efficient working of the

harbour/port/marina and there is no significant adverse impact on the coastal landscape and seascape. There will also be presumption against inappropriate development on green space and open space adjacent to the coast within coastal settlements.

- 6.15 Development at risk is addressed under policy DAR1 Land instability and Coastal Erosion. Under this policy there will be a presumption against development in areas of known land instability and/or coastal erosion. A precautionary approach will be applied to development in coastal locations which may be susceptible to land instability and/or coastal erosion. This approach reflects the regional direction set in the SPPS. Given the lack of current information necessary to identify areas of known risk, none have been identified in the draft Plan Strategy. The position will be kept under review and the Council and will seek to designate areas of known risk when supporting data becomes available regionally. This position will be considered again at the LPP stage.

## 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 landscape character is regarded as sound because it meets the various tests of soundness as summarised below (Policies LA1 – Special Countryside Policy Areas, LA2 – Areas of Outstanding Natural Beauty, LA3 – Local Landscape Policy Areas and LA4 – Areas of High Scenic Value, CO1- The Undeveloped Coast and CO2 - The Developed Coast as well as DAR1 – Development at Risk from Land Instability or Coastal Erosion.)

<b>Procedural Tests</b>	
P2	The POP has been published and any relevant comments received have been taken into consideration
P3	Policies LA1-LA4, CO1-CO2 and DAR1 have been subjected to sustainability appraisal. Details of which are in the Sustainability Appraisal Report
<b>Consistency Tests</b>	
C1	Policies LA1-LA4, CO1-CO2 and DAR1 have taken account of relevant provisions of the Regional Development Strategy – 2035, as set out in paragraphs 2.3-2.4 of this Technical Supplement.
C2	Policies LA1-LA4, CO1-CO2 and DAR1 have taken account of the Council's Community Plan, it provides a framework for the determination of planning applications to create prosperous

	communities and a clean and sustainable environment, as per paragraphs 2.16-2.17 of this Technical Supplement.
C3	Policies LA1-LA4, CO1-CO2 and DAR1 have taken account of the provisions of the Strategic Planning Policy Statement as it relates to the Countryside, as per paragraphs 2.11-2.14 of this Technical Supplement.
C4	Policies LA1-LA4, CO1-CO2 and DAR1 have taken regard of the existing Local Development Plans in Newry, Mourne and Down District Council, and has incorporated their relevant provisions, and to any relevant provisions of published LDP documents of neighbouring Councils, as per paragraphs 2.15 of this Technical Supplement.
<b>Coherence and Effectiveness Tests</b>	
CE1	Policies LA1-LA4, CO1-CO2 and DAR1 have taken account of the published LDP's of neighbouring Council, there is no conflict between the Policies and the equivalent provisions of this LDP, where designations cross over the Council boundaries, the provisions of the relevant policy have been incorporated into the LDP (Policy LA4 – Areas of High Scenic Value).
CE2	Policies LA1-LA4, CO1-CO2 and DAR1 has been formulated on a sound evidence base, drawing on the baseline information set out in LDP Preparation Papers 6, 7, 8, 9, 10, 11, 12 and 13, which have been updated as required during the preparation of this Technical Supplement.
CE3	Annual monitoring is not considered necessary as the providers of public services will make their requirements for new facilities known to the Council either through the preparation of the Local Policies Plan, or where necessary the Development Management Process.
CE4	Policies LA1-LA4, CO1-CO2 and DAR1 will be reviewed during the statutory review of the Plan Strategy and any changes necessary will be made through this process.

## 8.0 Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
Policy COU1 – BNMAP; Policy allows for developments in SCAs either of regional or local importance or the consolidation of existing development	<p>RDS – RG11 Conserve, Protect and where possible Enhance our built heritage and our Natural Environment.</p> <p>SPPS – Paragraph 5.32 requires all Councils to carry out a Sustainability Appraisal which incorporates a Strategic Environmental Appraisal,</p> <p>Paragraph 6.76 requires Councils to identify key features and assets of the countryside through the carrying out of an Environmental Assets Appraisal and a Landscape Assessment, both of which contribute to the evidence base for the LDP.</p>	KY22 “Review and Extend Special Countryside Areas.”	Reference POP6 – Agrees with Council’s overall approach but considers that the western part of the Mourne SCA does not merit being included in the SCA.	Policy LA1 – Special Countryside Areas. Carries over and updates existing policy provisions, on basis of recommendations in Landscape Appraisal, the Mourne and Slieve Croob SCAs are to be extended into the former Down DC Area.

Policy NH6 – PPS2 requires development proposals in Areas of Outstanding Natural Beauty (AONB) to be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife.				Policy LA2 – Areas of Outstanding Natural Beauty. The policy carries over and updates the existing policy.
Policy CVN3 – BNMAP allows for developments in LLPAs that would not adversely affect their intrinsic environmental value				Policy LA3 – Local Landscape Policy Areas. The Policy carries over and updates the existing policy.
Policy COU4 - ADAP, an AoHSV is designated at Magheraknock Loughs, the greater part of which is situated within Lisburn and Castlereagh District.				Policy LA4 – Areas of High Scenic Value. Sole AoHSV is largely within Lisburn and Castlereagh District. The policy carries over and updates the existing policy.



The Coast				
PSRNI Policy CO 1: The Undeveloped Coast – outlines two circumstances where development proposals may be permitted on the undeveloped coast: where it is of such national or regional importance to outweigh any potential detrimental impact to the coastal environment; and where no feasible alternative site within an existing urban area exists. The policy will not normally permit development in major risk areas.	<p>The undeveloped coast policy contained within the SPPS accords with policy CO 1.</p> <p>The SPPS outlines that LDPs and future adopted Marine Plans should be complementary, particularly with regard to the inter-tidal area (para 6.51).</p>	<p>Key Issue 23: Coastal Erosion and Land Instability</p> <p>Option 3 is the Council's preferred option as it allows the specific details to be assessed ensuring there will be no negative impact on coastal erosion or land instability.</p>	<p>DfI Strategic Planning Division disagreed with the favoured approach and within their response were critical of some of the elements included within the Preferred Option while also highlighting a number of points for further consideration.</p>	<p>Policy CO1 – The Undeveloped Coast. A presumption against all new development other than in exceptional circumstances within the undeveloped coastal zone. Policy outlines list of exceptions – proposal must constitute one of these.</p>
PSRNI Policy CO 2: The Developed Coast – Policy seeks to encourage and support development proposals for the enhancement and	<p>The developed coast policy contained within the SPPS accords with Policy CO 2.</p> <p>The SPPS also states that development along the developed</p>			<p>Policy CO2 – The Developed Coast. Policy lists criteria that proposals for development within an existing harbour, port or marina must meet. There is a presumption against</p>

regeneration of urban waterfronts and lists a set of criteria applicable to coastal development proposals.	coast is subject to all other relevant planning policies and emphasises that LDPs and future adopted Marine Plans should be complementary, particularly with regard to the inter-tidal area.			inappropriate development on green space and open space adjacent to the coast within settlements.
Development at Risk				
Policy PSU 10: Development at Risk This policy states that development will not normally be permitted in areas known to be at serious risk from flooding, coastal erosion or land instability. Under this policy, new development in coastal areas will not normally be permitted where expensive engineering works would be required to either protect development on land subject to	The SPPS accords with Policy PSU 10 in that there is a presumption against development in major at-risk areas. However, the SPPS explicitly states that development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability. The SPPS does not explicitly state that new development in coastal areas will not normally be permitted where expensive			Policy DAR1 – Development at Risk from Land Instability or Coastal Erosion. Policy outlines that the Council will not permit development in known areas of land instability and/or coastal erosion and will apply a precautionary approach to development in locations which may be susceptible to land instability and/or coastal erosion.

coastal erosion, or defend land at risk from coastal flooding.	<p>engineering works would be required in coastal locations.</p> <p>In relation to land instability, the SPPS does not explicitly address specialist assessments or circumstances where planning permission will be refused.</p> <p>The SPPS reinforces Policy PSU 10 by stating that LDPs should identify areas of the coast known to be at risk from flooding, coastal erosion or land instability where new development should not be permitted (see para 6.46).</p>			
Supplementary Planning Guidance AONB Design Guides etc				New Supplementary Planning Guidance

## **Appendices**

[Appendix 7A Landscape Character Review](#)

[Appendix 7B Strategic Settlement Appraisal](#)

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

---