

Dréacht-Straitéis an Phlean Forbartha Áitiúla 2035

Local Development Plan draft Plan Strategy 2030

Forlónadh Teicniúla 9 – Teileachumarsáid agus Fóntais Phoiblí Meitheamh 2025

Technical Supplement 9 – Telecommunications and Public Utilities June 2025

Contents

Chapter 1: Telecommunications and Other Public Utilities

1.0 Introduction	2
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Chapter 2: Telecommunications & Broadband

2.0 Introduction to Telecommunications and Broadband	4
2.1 Policy Context	5
2.2 Preferred Options Paper	13
2.3 District Profile - Telecommunications & Broadband	14
2.4 Consultee and Stakeholder Engagement	19
2.5 Draft Plan Strategy Approach	20
2.6 Soundness	21
2.7 Evolution of Policies	23

Chapter 3: Renewable Energy

3.0 Introduction to Renewable Energy	1
3.1 Policy Context	2
3.2 Preferred Options Paper	10
3.3 District Profile - Renewable Energy	13
3.4 Consultee and Stakeholder Engagement	17
3.5 Draft Plan Strategy Approach	18
3.6 Soundness	20
3.7 Evolution of Policies	21

Chapter 4: Waste Management

4.0 Introduction to Waste Management	1
4.1 Policy Context	2
4.2 Preferred Options Paper	10
4.3 District Profile – Waste management	11
4.4 Consultee and Stakeholder Approach	13
4.5 Draft Plan Strategy Approach	14
4.6 Soundness	16
4.7 Evolution of Policies	17

Chapter 5: Flood Risk and Drainage

5.0 Introduction to Flood Risk and Drainage	1
5.1 Policy Context	2
5.2 Preferred Options Paper	9
5.3 Flood Risk and Drainage Profile	10
5.4 Consultee and Stakeholder Approach	11
5.5 Draft Plan Strategy Approach	22

5.6 Soundness	24
5.7 Evolution of Policies	25

APPENDICES

Appendix A: Housing Evaluation Framework

Appendix B: Policy Development Table

Appendix C: 1/100 Year Climate Change Flood map Downpatrick

Appendix D: 1/100 Year Climate Change Flood map Newcastle

Appendix E: 1/100 Year Climate Change Flood map Newry

Appendix F: Wastewater Treatment Works Capacity in NM&D

1.0 Introduction

Purpose of this Document

- 1.1 The Technical Supplements that accompany the Draft Plan Strategy of the Newry, Mourne and Down Local Development Plan 2035, provide an overview of the evidence base that has been used to inform the decisions involved in its preparation. They should be read in conjunction with the relevant sections of the Plan Strategy in order to develop a full understanding of the position.
- 1.2 This Technical Supplement builds upon the work carried out in producing Position Paper 9, which was presented to the Council's Planning Committee in January 2017 as part of the process of developing the Preferred Options Paper. It provides an overview of the policy context and of the current situation relating to Telecommunications and other Public Utilities (Gas, Electricity, Drinking Water and Wastewater) Renewable Energy, Waste Management and Flood Risk and Drainage within the District and of the organisations responsible for their delivery.

Planning and Public Utilities

- 1.3 While the Council is not directly responsible for the provision of the majority of the Public Utility Services within the District, through the LDP process it can identify and zone lands for the provision of such services, safeguarding them for future use, and by encouraging sustainable patterns of development it can help make the provision of such services viable.

Chapter 2: Telecommunications and Broadband

Contents

2.0 Introduction to Telecommunications and Broadband	4
2.1 Policy Context	5
2.2 Preferred Options Paper	13
2.3 District Profile – Telecommunications and Broadband	14
2.4 Consultee and Councillor Engagement	19
2.5 Draft Plan Strategy Approach	20
2.6 Soundness	21
2.7 Evolution of policies	23

Tables

Table 1: Cross Boundary Policy Context	10
Table 2: Existing Water Supply in Newry, Mourne and Down Council Area	15

Figures

Figure 1: HV Transmission Network Northern Ireland	17
Figure 2: Major gas pipelines and supplier areas	18

2.0 Introduction to Telecommunications and Broadband

- 2.0.1 Telecommunications are an increasingly important part of the fabric of everyday life for both residents and businesses. The ability to communicate in real time across long distances enables businesses to trade with suppliers or customers in other parts of the world and the growth in online services and social media enables residents to access a greater range of goods and services as well as new sources of information. The importance of up-to-date telecommunications infrastructure has been heightened by the increased use of homeworking following the COVID-19 pandemic, which requires remote workers to access the computer systems of their employers through home broadband.
- 2.0.2 Public utilities are a range of services provided by statutory undertakers, either publicly or privately owned, that are consumed or utilised by members of the public. These include electricity, gas, water and sewerage (also known as wastewater), they are essential to the functioning of a modern society.
- 2.0.3 The importance of both telecommunications and other public utilities to the competitiveness and functioning of society and the economy means that facilitating investment in their expansion and upgrading will play a significant role in the Local Development Plan achieving its aims, particularly in relation to Housing, Economic Development and Environmental Issues.
- 2.0.4 This technical supplement brings together the evidence base that has been used to inform the preparation of the Newry, Mourne and Down Local Development Plan (LDP) 2035 draft Plan Strategy. It seeks to present issues and draws together the evidence base used in relation to the topic of Telecommunications and other utilities. It is one of a suite of topic based technical supplements that should be read alongside the draft Plan Strategy to understand the rationale and justification for the policies proposed within it.

2.1 Policy Context

Regional Policy Context

Programme for Government 2024-2027 – “Our Plan – Doing What Matters Most”¹

- 2.1.1 The Programme for Government (PfG) was agreed by the Northern Ireland Executive on 27 February 2025.
- 2.1.2 The PfG sets out 4 themes under which a number of priority areas are identified, in these areas the current issues and a number of measures to address them are listed. The roles of telecommunication services and water and wastewater services in contributing to the development of housing and the economy are identified and the need to increase the capacity of the system to enable investments in homes and businesses to proceed is recognised.

The Regional Development Strategy 2035 (RDS)²

- 2.1.3 The RDS provides an overarching strategic planning framework to facilitate and guide the public and private sectors and ultimately shall influence Council decisions and investments. It identifies the need to improve connectivity for the sharing of information and the improvement of public utilities as being essential for growth.

Telecommunications

- 2.1.4 Regional Guidance RG3 recognises the need for an efficient telecommunications infrastructure to give Northern Ireland a competitive advantage. Northern Ireland’s core communication network is of high quality which is necessary for sustainable economic growth and investment. Therefore, it is important to continually improve international and internal connectivity. The RDS 2035 envisages that next generation broadband services will be available to provide support for 85% of businesses.
- 2.1.5 Spatial Framework Guidance (SFG) 14 also recognises that rural areas can be disadvantaged by their remote location in terms of access to essential services. Further innovation and advancements upon the existing rural telecommunication infrastructure will work to lessen this disadvantage.

Energy Supply

- 2.1.6 Regional Guidance RG5 seeks to deliver a sustainable, reliable and secure energy supply to all sectors across the region. The development of new

¹ [Programme for Government 2024-2027 'Doing What Matters Most'](#)

² [Regional Development Strategy 2035](#)

- generation or distribution infrastructure will seek to avoid adverse environmental impacts, particularly on or near protected sites.
- 2.1.7 Regional Guidance RG9 seeks to reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality. The need to adopt low carbon energy generation and the adaptation of homes to minimise energy usage for heating accordingly is encouraged.

Water and Wastewater

- 2.1.8 Regional Guidance RG12 promotes a more sustainable approach to the provision of water and sewerage services and flood risk management. Increased population, changes in household formation and climate change continue to put pressure on our water resources and drainage systems which may lead to discrepancies in water demand and availability as well as potentially impacting on water quality. Planning for the provision of water and sewage infrastructure and treatment facilities is both a practical and environmental necessity for regional development.
- 2.1.9 Finally the Housing Evaluation Framework states that studies should be carried out to assess and detail physical infrastructure such as water, waste and sewage, including spare capacity. This is to ensure that the infrastructure is adequate to support the provision of future housing.

Sustainable Water – A Long-Term Water Strategy for Northern Ireland (2015-2040)³

- 2.1.10 The Strategy was published by the Department for Infrastructure (DfI) in March 2016, setting out its plans for the management of the water industry in Northern Ireland. It highlighted that planning policies must play a key role in promoting sustainable water and sewerage services infrastructure, and that Local Development Plans should require the incorporation of sustainable drainage systems as well as making provision for wastewater treatment facilities.
- 2.1.11 The strategy identifies four key sections, which in turn set out a number of aims, policies and actions to achieve sustainable water. Where necessary these will be incorporated into LDP's;
- Drinking Water Supply and Demand;
 - Flood Risk Management and Drainage;
 - Environmental Protection and Improvement, and;
 - Water and Sewage Services.
- 2.1.12 The Mourne Mountains are an important source of water for the Belfast Metropolitan Area as well as for Armagh City, Banbridge and Craigavon

³ [Sustainable Water - A Long-Term Water Strategy for Northern Ireland \(2015-2040\) | Department for Infrastructure](#)

Borough Council. Any future proposals for the upgrading of these facilities will be incorporated into the Local Policies Plan.

The Strategic Planning Policy Statement (SPPS)⁴

- 2.1.13 The SPPS was adopted in September 2015, it provides a framework for the replacement of the retained Planning Policy Statements by the Local Development Plans of Councils.
- 2.1.14 One of the Core Planning Principles of the SPPS is "Supporting Sustainable Economic Growth," paragraph 4.21 states that supporting such growth does not mean compromising on environmental standards. Another of the Core Principles is "Supporting Good Design and Place Making," paragraph 4.24 emphasises that new developments should be designed to minimise energy and water usage as well as carbon emissions. It also states that future proofing new developments for modern technology such as telecommunications can prevent the need for expensive retrofitting in the future.
- 2.1.15 The SPPS also sets guidance for the development of LDP policies on Telecommunications and other Public Utilities in paragraphs 6.235-6.238, it states that Northern Ireland's existing telecoms infrastructure gives it a competitive advantage, that modern telecommunications are an essential part of everyday life and that the role of other strategic infrastructure such as energy and water is also recognised.
- 2.1.16 The Regional Strategic Objectives for Telecommunications and Other Public Utilities, seek to maximise the use of mast and site sharing by telecoms operators, minimise visual intrusion and interference with other systems. In addition, Paragraph 6.246 states that LDP's should "allocate sufficient land to meet the anticipated needs of the community, in terms of health, education and other public services." Finally paragraph 6.250 states that new power lines should avoid Areas of Outstanding Natural Beauty.

Planning Policy Statement 10 – Telecommunications⁵

- 2.1.17 PPS10 is the operational policy for the determination of planning applications for telecommunications development. Among its aims and objectives was to facilitate the growth of telecommunications infrastructure, whilst encouraging mast and site sharing and minimising visual intrusion, particularly in sensitive areas. It contained two operation policies, TEL1 Control of Telecommunications Development, and TEL2 Development and Interference with Television Broadcasting Services, the latter policy was cancelled by the introduction of the SPPS.

⁴ [Strategic Planning Policy Statement for Northern Ireland](#)

⁵ [Planning Policy Statement 10 - Telecommunications](#)

Planning Policy Statement 21 – Sustainable Development in the Countryside⁶

- 2.1.18 PPS21 provides operational planning policy for a range of developments in the countryside. Policy CTY16 – Development Relying on Non-Mains Sewerage aims to prevent pollution incidents and mitigates the effects of runoff from septic tanks on rivers.

Planning Strategy for Rural Northern Ireland⁷

- 2.1.19 Among the remaining policies of the Rural Strategy that are still in effect is PSU11 – Overhead Cables, which relates to the installation of electricity pylons and overhead lines. The policy seeks to facilitate the installation and improvement of such infrastructure while preventing areas being dominated by “wirescapes.”

Supplementary Planning Guidance

- 2.1.20 Further guidance on the installation and siting of infrastructure is contained in DCAN 14 – Siting and Design of Radio Telecommunication Equipment⁸ and the relevant sections of Creating Places – Achieving Quality in Residential Development.⁹

Local Policy Context Existing Area Plans

- 2.1.21 The District is currently covered by two Area Plans, both of which are now beyond their end date;
- Ards and Down Area Plan 2015 (Adopted March 2009)¹⁰
 - Banbridge, Newry and Mourne Area Plan (Adopted October 2013)¹¹
- 2.1.22 The Ards and Down Area Plan 2015 set out a policy framework in relation to Public Services and Utilities which gave an overview of works being carried out by the service providers to upgrade their infrastructure. No sites for new works or infrastructure were identified in the Plan.
- 2.1.23 Similarly the Banbridge, Newry and Mourne Area Plan provided an overview of the current arrangement for utility provision with the plan area and highlighted measures being taken by statutory undertakings to enhance their networks, but it contained no operational policy or identified sites for new works.

⁶ [Planning Policy Statement 21 - Sustainable Development in the Countryside](#)

⁷ [A Planning Strategy for Rural Northern Ireland](#)

⁸ [DCAN14 - Design and Siting of Radio Telecommunications Equipment](#)

⁹ [Creating Places - Achieving Quality on Residential Development](#)

¹⁰ [Ards and Down Area Plan 2015](#)

¹¹ [Banbridge/Newry and Mourne Area Plan 2015](#)

Newry Mourn and Down District Council Corporate Plan 2024-2027¹²

- 2.1.24 The Councils mission is to "*To deliver sustainable services and empower our communities through transparent governance and collaboration*". The Corporate Plan incorporates the outcomes set in the Community Plan into it's vision for the District and sets objectives for the Council in achieving these. It is stated that 88% of the District had access to broadband speeds of at least 30mbits/se while 71% had access to full fibre services.

Newry, Mourn and Down Community Plan 2030 – "Living Well Together"¹³

- 2.1.25 The Community Plan is the overarching strategic plan for integrated planning and delivery of services in Newry Mourn and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards achieving its outcomes.
- 2.1.26 Section 8 of the Local Government Act 2014, (as amended) requires the Council to take its Community Plan into account in LDP preparation. The LDP team has therefore formulated the Draft Policies in order to contribute towards the achievement of these outcomes.
- 2.1.27 The Community Plan sets 5 outcomes for the life conditions that it seeks to achieve for Newry Mourn and Down, among these are "All People in Newry, Mourn and Down get a good start in life and fulfil their lifelong potential," among the indicators listed which will show progress towards achieving this is "Level of Connectivity." Another relevant outcome is "All people in Newry, Mourn and Down benefit from prosperous communities," with the listed indicator "Level of Economic Investment." Finally, "All people in Newry, Mourn and Down benefit from a clean, quality and sustainable environment" which list "Level of Quality Living Environment" as an indicator. Increases in all of these indicators will show progress towards the achievement of these outcomes.

Cross Boundary Policy Context

- 2.1.28 The current situation in relation to LDP policies on Telecommunications and other Public Utilities in the neighbouring Councils is set out below.

¹² [Newry Mourn and Down District Council - Corporate Plan 2024-2027](#)

¹³ [Newry Mourn and Down District Council Community Plan 2030 - 'Living Well Together'](#)

Table 1: Cross Boundary Policy Context

Neighbouring Council	Position
Ards and North Down Borough Council (ANDBC)	Ards and North Down Borough Council published its Preferred Options Paper ¹⁴ in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the preferred options. The most relevant of these are, Key Issue 13 – Telecommunications, Preferred Option is to adopt Regional Policy to encourage development of the infrastructure without compromising the natural environment of the Borough. Key Issue 20 - Drainage, Preferred Option is to require the incorporation of SuDS in all new development,
Lisburn and Castlereagh City Borough Council (LCCBC)	Lisburn and Castlereagh City Council published adopted Local Development Plan ¹⁵ in September 2023. Objective F of the Spatial Strategy is titled "A Connected Place" among the actions listed is "Facilitate the development of telecommunications and other infrastructure throughout the plan period." Strategic Policy 22 provides guidance ensuring that new infrastructure is delivered, while it is not detrimental to the natural and historic environment, while being "future-proof" to facilitate upgrades in the future. Operational Policy is provided by policies TEL1 and UT1 which encourage mast sharing and laying cables and pipelines underground where possible to minimise visual intrusion.
Armagh City, Banbridge and Craigavon Borough Council (ABCBC)	Armagh City, Banbridge and Craigavon Borough Council published its Preferred Options Paper ¹⁶ in March 2018. Key Issue ECN12 relates to Telecommunications and other Utilities, the preferred option is to "Provide a criteria-based policy in line with existing policies and regional guidance."

¹⁴ [Ards and North Down Borough Council, Local Development Plan - Preferred Options Paper](#)

¹⁵ [Lisburn and Castlereagh City Council Local Development Plan 2030 - Adopted Plan Strategy](#)

¹⁶ [Armagh City, Banbridge and Craigavon Borough Council - Local Development Plan Preferred Options Paper](#)

<p>Louth County Council, Republic of Ireland (LCC ROI)</p>	<p>Louth County Council published its Development Plan¹⁷ in September 2021. Chapter 10 is titled "Infrastructure and Other Utilities." The overall aim is "Support County Louth's strategy for targeted population and strong economic growth in line with national and regional objectives through protection, improvement and extension of water services infrastructure, and flood alleviation services throughout the County, in conjunction with other statutory bodies. Encourage and support energy and communication efficiency to achieve a reasonable balance between responding to EU and national policies on climate change, renewable energy, communications and enabling resources to be harnessed in a sustainable manner in accordance with the future proper planning and development of the County." The policy objectives provide guidance as to how such developments are to be assessed, among these is the requirement to provide open access ducting in new developments to enable the installation of new technologies in the future and prohibiting satellite dishes in Conservation Areas.</p>
<p>Monaghan County Council</p>	<p>Monaghan County Council published the Interim Version of its County Development Plan¹⁸ on May 26th 2025. Chapter 7 relates to Transport and Infrastructure, Telecommunications Strategic Objective 1 states "To facilitate the development of a high quality and sustainable telecommunications network for County Monaghan to support economic growth, improve quality of life and enhance social inclusion." It is accompanied by 7 objectives that seeks to support the delivery of high quality telecommunications infrastructure and futureproofing new development while protecting the interests of residents and other factors.</p>

¹⁷ [Louth County Development Plan 2021-2027](#)

¹⁸ [Monaghan County Development Plan 2025-2031 \(Interim Version\)](#)

- 2.1.29 As part of the preparation of the Draft Plan Strategy, the LDP Team has held discussions with DfI and the LDP Teams of all the neighbouring Councils at which the different issues encountered by them have been discussed and the rationale behind the chosen policy approaches have been set out. These have been used by the LDP Team to inform its own policy recommendations on these issues.
- 2.1.30 The Council considers that its Draft Policies are consistent with Regional Policy and the adopted LDP strategies of adjoining authorities as they seek to facilitate the provision of new infrastructure while minimising and mitigating adverse impacts on the natural and built environment, and require that new developments are “future proofed” to allow for the installation of new technologies at a later date with the minimum of work.

2.2 Preferred Options Paper

- 2.2.1 The Council published the Preferred Options Paper (POP)¹⁹ as the first stage in the preparation of the LDP on 29 May 2018. Paragraph 4.5 set out the Strategic Objectives for the LDP, one of the two economic objectives is “Supporting the Transportation Network and Other Infrastructure.” under this objective two goals are outlined;
- To support digital connectivity which meets the needs of business and private households while reducing the need to travel;
 - Accommodate investment in public utilities and waste management.
- 2.2.2 As part of the process of preparing the POP a Preliminary Review of Operational Planning Policy was carried out which drew upon operational experience and changes in regional planning policy to identify issues to be addressed through the preparation of the LDP.
- 2.2.3 The POP identified 24 Key Issues, provided suggested options for addressing them and identified the Council’s preferred option for each Key Issue.
- 2.2.4 Key Issue 19 related to Telecommunications, it contained one suggested option, to adopt the current policy approach as set out in the SPPS and PPS10 and would not designate Areas of Constraint on Telecommunications Developments
- 2.2.5 A period of public consultation was carried out over the next 12 weeks. A total of 222 responses was received from members of the public, community groups, charitable organisations, private interests and public bodies. No responses related specifically to telecoms and public utilities, or which suggested alternative options were received.

¹⁹ [Newry Mourne and Down Local Development Plan 2030 - Preferred Options Paper](#)

2.3 District Profile - Telecommunications & Broadband

- 2.3.1 Modern telecommunications are an essential and beneficial element of everyday living for the people of and visitors to this District. The Draft Plan Strategy aims to support investment in high quality communications infrastructure which plays a vital role in our social and economic well-being.
- 2.3.2 Whilst regional and local planning policy recognises that the development of high-quality telecommunications infrastructure is essential for continued economic growth, it is necessary to minimise the impact on the environment as set out in the SPPS and PPS 10. The Draft Plan Strategy seeks to update the operational planning policies to take account of the development of new technologies while protecting the natural and built environments, therefore the policies take account of the potential effects of telecommunications development on visual amenity and environmentally sensitive areas and seeks to minimise the need for new developments.

Network Coverage.

- 2.3.3 Mobile telephone services are provided by 4 Code System Operators, O2, Vodafone, EE and 3, in September 2023, their 4G networks covered 94% of the district, while their 5G services were available across 51% of its area with just 212 premises having no fixed or mobile coverage. **The total data traffic in July 2024 was 1,835TB with 1,700TB carried on 4G networks and 89TB on the 5G systems.²⁰**
- 2.3.4 The ongoing rollout of 5G services is anticipated to be a source of significant planning applications in the future.

Broadband

- 2.3.5 The broadband market in Northern Ireland is fully privatised with the principal domestic and business provider being British Telecom (BT) with other providers such as Plusnet, EE, SKY, Talk Talk and Virgin Media. Northern Ireland currently enjoys the best fixed line broadband infrastructure in the UK although there are some rural areas which still have limited connectivity.
- 2.3.6 Access to Broadband, by both domestic and business customers is an important factor in economic competitiveness especially since the increased uptake in homeworking following the COVID-19 pandemic. Increasing Broadband connectivity has been a key priority of previous Programmes for Government which have approved a range of initiatives

²⁰ [Ofcom "Connected Nation 2024"](#)

such as the Northern Ireland Broadband Fund and Project Kelvin that have helped deliver a significant increase in network coverage and speeds

- 2.3.7 Project Stratum, an initiative to extend access to superfast broadband services of at least 30 Mbps to 85,000 premises across Northern Ireland by March 2025 is currently ongoing. The most recent update is that 62,000 premises have been connected, and the project is on target to achieve its goals.²¹
- 2.3.8 In June 2022 the Department for the Economy launched the Mobile Action Plan for Northern Ireland which aims to identify issues which inhibit the rollout of mobile networks and sought to establish solutions to enable better, faster and more consistent mobile coverage throughout Northern Ireland. It identified 8 actions to be taken to address these barriers, Action 8 states;
"Northern Ireland Councils should ensure that Local Development Plans take account of the changing nature of mobile telecoms solutions and ensure policies are future-proofed and regularly reviewed in line with mobile telecoms industry developments."
- 2.3.9 As indicated in Action 7 of the MAP, in December 2022 the Northern Ireland Barrier Busting Taskforce was established to develop an implementation plan for addressing these barriers, local councils have been involved with this Taskforce and have committed to ensuring that LDP's take account of the requirements of the MAP in relation to the future proofing of new policies and other issues. As set out in Action 4 of the MAP, each Council has appointed a "Digital Champion" who advises the Council's departments on the implementation of the MAP while liaising with Government Departments and other bodies and developing an understanding of the connectivity issues specific to that Council so the LDP policies can adequately address them.

Water supply and Wastewater Water Supply

- 2.3.10 Water supply services in the district are the responsibility of Northern Ireland Water, drinking water is sourced from the following locations²²

Table 2: Existing Water Supply in Newry, Mourne and Down Council Area

Impounding Reservoir	Raw Water Source
Ben Croom Reservoir	Lough Neagh
Fofanny Dam	Lough Ross
Lough Island Reavy	
Silent Valley	
Spelga Dam	

²¹ [Strategic Investment Board NI "Project Stratum"](#)

²² [NI Water - Reservoir Levels](#)

- 2.3.11 The District's tap water was compliant with standards according to the most recent report, an upgrade of Drumaroad Water Treatment Works in Castlewellan is currently being carried out.²³

Wastewater/Sewerage

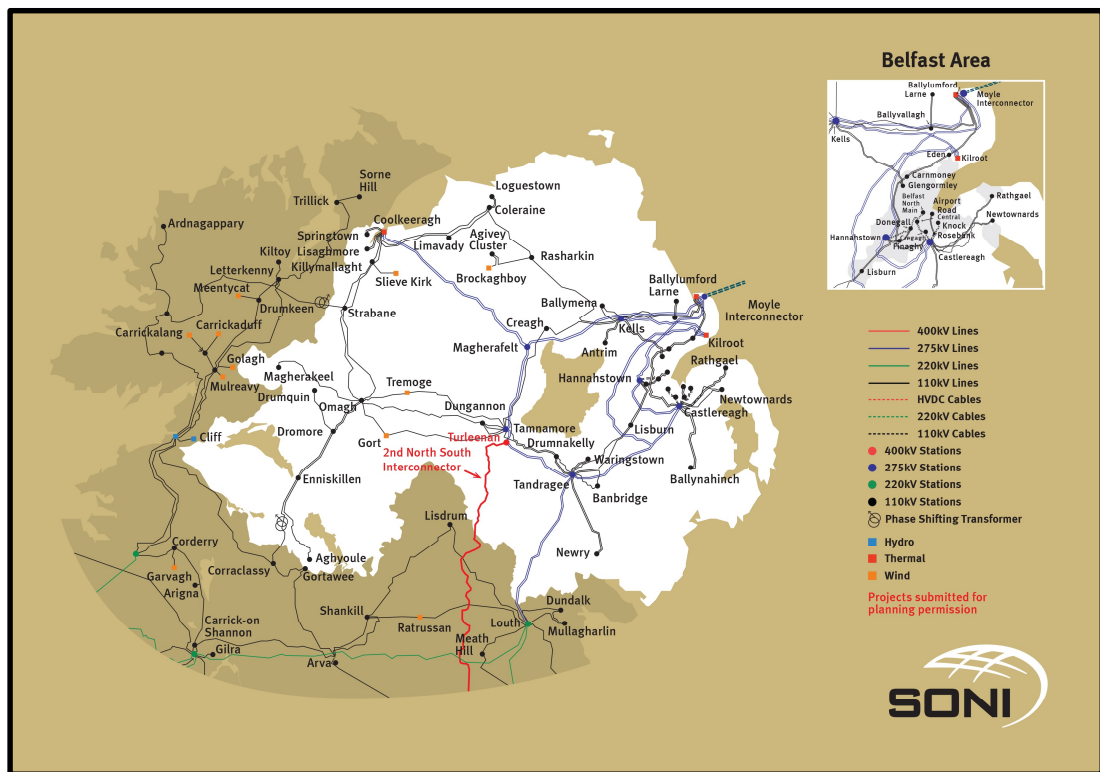
- 2.3.12 The provision of wastewater and sewerage services is also the responsibility of Northern Ireland Water. The capacity of the system to accommodate future growth is a key consideration in the formulation of the plan.
- 2.3.13 The RDS sets Housing Growth Indicators for each Council Area up until the year 2030. The most recent figures published in 2019 states that a total of 10,000 new dwellings are required in the district by 2030.
- 2.3.14 The District currently has 102 Wastewater Treatment Works and Facilities, the most recently available information on the status of the capacity of the infrastructure is from June 2024 and is included in Appendix B. The assessment of available capacity or "headroom" is calculated on the basis of population growth figures of 5, 10 and 15 percent as well as the capacity of the sewers themselves.
- 2.3.15 On the basis of this information there is severe capacity constraints on the network that affect most of the main settlements within the District, as well as in the smaller settlements and in the rural area. NI Water's current investment programme includes upgrades to the network in Newry, Downpatrick, Newcastle, Drumaness and Annsborough. As these works are completed it is anticipated that additional headroom may become available.

Energy Supply Electricity

- 2.3.16 Most of the District's electricity is sourced from existing gas fired thermal stations at Ballylumford and Kilroot, as well as from commercial wind farms in other parts of Northern Ireland and augmented by energy imported through the interconnectors.
- 2.3.17 Electricity is distributed to consumers through the grid network, it is supplied through a wholesale market known as the Single Electricity Market that covers the entire island. Operation of the network is split between SONI, which is responsible for the Transmission System and NIE Networks which operates the Distribution System. The final supply to consumers is carried out by suppliers such as Power NI.

²³ [NI Water - Drinking Water Quality Annual Report 2023](#)

Figure 1: HV Transmission Network Northern Ireland



(Source SONI – Shaping Our Electricity Future)

- 2.3.18 The Council has previously expressed the view that the lack of High Voltage Transmission lines in the District is an impediment to investment. SONI's Draft Transmission Development Plan 2023-2032 proposes an reinforcement of the substation in Newry to provide additional capacity and it is forecast for completion by 2030²⁴. NIE Networks completed a project in November 2019 to upgrade the low voltage network in Newry City Centre to provide additional capacity.²⁵

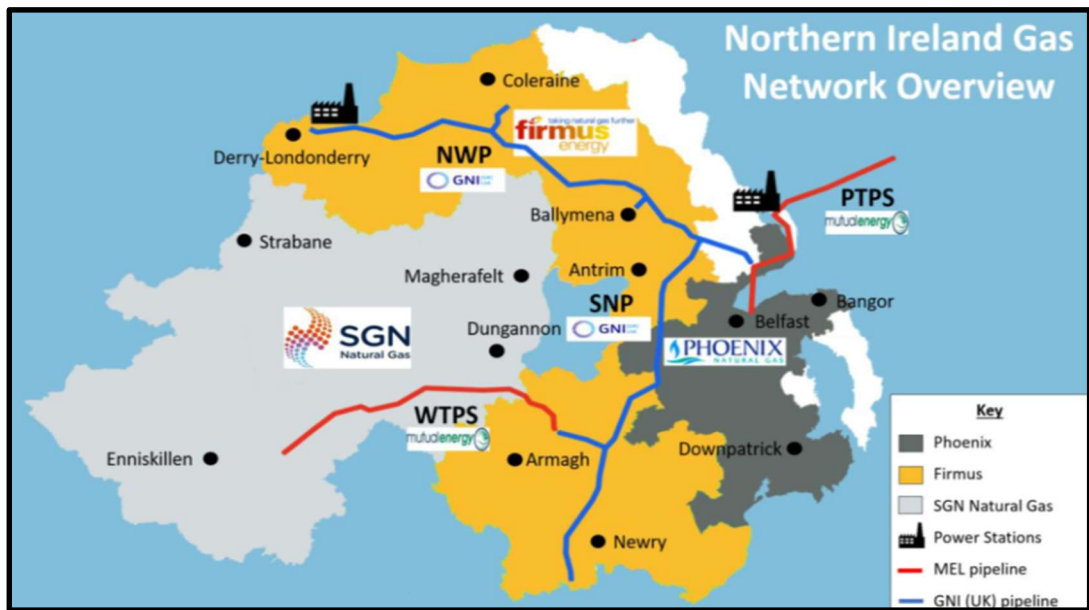
Gas

- 2.3.19 The supply of natural gas was reintroduced to Northern Ireland in 1996, initially in the Belfast Metropolitan Area by Phoenix Natural Gas, which included the former Down District Council area, but has since been rolled out across the Region. In 2005 Firmus Energy was awarded a license to develop a new natural gas network outside of the BMA, based on the South-North Pipeline, most of the main settlements are now connected to these networks.

²⁴ [SONI - Draft Transmission Development Plan 2023-2032](#)

²⁵ [NIE Networks - Newry Low Voltage Network Upgrade](#)

Figure 2: Major gas pipelines and supplier areas



(Source The Utilities Regulator)

- 2.3.20 The South-North Pipeline crosses the western part of the district from near Forkhill, passing close to Newry and then entering Armagh, Banbridge and Craigavon District close to the small settlement of Glen. Development Management consults with the pipeline operator GNI(UK) on planning applications that fall within a buffer zone on either side of the pipeline. The current operational policy regime was largely formulated before the re-introduction of natural gas supply, and it is silent on its implications. It is considered that updating the policy framework to formalise the existing consultation arrangements and provide protection in policy to the pipeline, and other key infrastructure that exists or may be developed within the district is beneficial.
- 2.3.21 Under the terms of their licenses, operators such as Phoenix and Firmus may apply to the Utility Regulator to expand their distribution networks where they consider it economically viable to do so. The capital costs involved mean that remoter settlements and rural areas are unlikely to have the opportunity to avail of a gas supply.

2.3 Consultee and Stakeholder Engagement

- 2.4.1 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, providers of public utilities 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.

- 2.4.2 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.
- 2.4.3 A Briefing Paper outlining the proposed text of the policies for inclusion in the Draft Plan Strategy was presented to the Council's Planning Committee on 8 April 2021. Following this briefing, members voted to agree the draft planning policies for inclusion in the Plan Strategy and authorised the LDP Team to amend the draft policies as necessary in response to consultee engagement.

2.5 Draft Plan Strategy Approach

- 2.5.1 The Draft Plan Strategy seeks to facilitate the development of telecommunications and public utilities projects within the District, and to ensure that new developments are sufficiently "future proofed" to enable the installation of new telecoms infrastructure if required. It is in accordance with National and Regional Policy and also helps to implement the relevant sections of the Council's Community and Corporate Plans.
- 2.5.2 The telecommunications and public utilities policies have also been drafted to reflect the plan vision, specifically; *"A sustainable, well connected and high-quality place where our environment and cultural heritage are valued and protected to make the district an attractive place to live, work, invest and visit."* As well as the following objectives for the plan, as were set out in Table 3 in the draft Plan Strategy.
- **Economic;** Accommodate investment in public utilities and waste management.
 - **Environmental;** To protect our sensitive landscapes from inappropriate development.
- 2.5.3 The Spatial Growth Strategy contains Strategic Policy TUS1 Telecommunications and other Utilities, that supports the provision of new infrastructure where there is a need for the proposal, visual intrusion and amenity impacts are minimised and the proposal is "future proofed" to facilitate the upgrade and installation of new technologies.
- 2.5.4 There are two operational policies in the Draft Plan Strategy in relation to Telecommunications. Policy TCU1 – Telecommunications Development, provides criteria for the assessment of applications for telecoms development. Like the current regional policy set out in PPS10 it seeks to encourage mast sharing and other measures to minimise the visual impact of new developments. It also states that proposals in Special Countryside Areas will not be considered unless they comply with SCA policy.

- 2.5.5 Policy TCU2 - Future proofing of New Developments for Telecommunications Infrastructure, requires that new developments are capable of accommodating potential new telecommunications infrastructure through the incorporation of ducting and connection points.
- 2.5.6 Finally Policy TCU3 - Public Services and Other Utilities, replaces Policy PSU11 PSRNI- Overhead Cables, and incorporates other forms of utility development such as gas, electricity and water. This is considered necessary as there is no current policy for the assessment of major utilities projects, in addition when the PSRNI was drafted there was no operational gas network, as well as providing for potential expansion of the network, the new policy provides a basis for the consultation arrangements over the South-North Gas Pipeline, should other developments encroach on it.

2.6 Soundness

- 2.6.1 The LDP has been prepared to achieve the indicators of soundness as set out in the DfI Development Plan Practice Note: Soundness (Version 2, May 2017).²⁶ The Draft Plan Strategy, in relation to the renewable energy subject policies and other relevant policies in this document is regarded as sound, as it is considered they have met the tests of soundness as summarised below:

Table 3: Soundness

Procedural Tests	
P2	The Council's Telecommunications and Public Utilities policies have been developed from and evolved from the POP, POP Consultation Report, Consultee and Councillor Engagement.
P3	The Telecommunications and Public Utilities policies have been subject to a Sustainability Appraisal.
Consistency Tests	
C1	The Telecommunications Strategy and policies have taken account of the Regional Development Strategy, in particular Strategic Guidance RG5 and RG9, as set out in paragraph 3.1.8 of this Chapter.
C2	The Telecommunications Strategy and Policies TCU1, TCU2 and TCU3 have taken account of the Council's Community Plan and the Corporate Plan, it provides a framework for the determination of planning applications to provide new telecommunications and utilities infrastructure and enabling future proofing in new developments to meet the objectives of these documents as per paragraphs 2.1.21-2.1.24 of this Chapter.
C3	The Telecommunications Strategy and Policies TCU1, TCU2 and TCU3 have taken account of the provisions of the Strategic Planning Policy

²⁶ [Development Plan Advice Note 6 - Soundness](#)

	Statement as it relates to the provision of Telecommunications and Public Utilities, as per paragraphs 2.1.13-2.1.16 of this Chapter.
C4	The Telecommunications Strategy and Policies TCU1, TCU2 and TCU3 have been developed by taking account of the existing development plans and Council strategies relating to telecommunications and public utilities within Newry, Mourne and Down area.
Coherence and the effectiveness tests	
CE1	The LDP has been developed alongside other Councils emerging and adopted LDP's and no conflict has been identified as per paragraphs 2.1.28 – 2.1.30 of this Chapter.
CE2	The Telecommunications Strategy and Policies TCU1, TCU2 and TCU3 have been prepared on a sound evidence base, drawing on the baseline information set out in LDP Preparation Paper 9, which has been updated as required during the preparation of this Chapter.
CE3	Annual monitoring is not considered necessary as it is anticipated that the developers of large-scale infrastructure projects will make their requirements known through the preparation of the Local Policies Plan, or where necessary, the Development Management Process.
CE4	The Telecommunications Strategy and Policies TCU1, TCU2 and TCU3 will be reviewed at Plan Review Stage.

2.7 Evolution of Policies

Table 4: Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
Policy PSU11 – PSRNI; Policy seeks to ensure the development of overhead lines while preventing areas becoming dominated with “wirescapes”	RDS RG3 – Implement a balanced approach to telecommunications infrastructure that will give a competitive advantage.	KY19 Adoption of current regional policy, no areas of constraint on Telecommunications Development	No comments received to this specific area.	Strategic Policy TUS1 – Facilitate the provision of new infrastructure subject to criteria
Policy TEL1 – PPS10 Development of telecoms infrastructure while encouraging mast sharing and minimising visual intrusion.	RG5 – Deliver a sustainable and secure energy supply			Policy TCU1 – Control of Telecommunications Development. Provides framework for assessing applications, proposals will not normally be considered in SCA’s
Policy CTY16 - PPS21 aims to prevent pollution incidents and mitigate the run off from septic tanks.	RG9 – Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality			Policy TCU2 – Future Proofing of New Developments for Telecommunications Infrastructure. Requires that all new developments have suitable ducting to accommodate future telecoms connections.
Supplementary Planning Guidance DCAN13 Siting and Design of Radio Telecommunication Equipment	RG12- Promote a more sustainable approach to the provision of water and sewerage services and flood risk management			Policy TCU3 - Public Services and Other Utilities, covers the installation of gas, electric and water infrastructure,
	SPPS – Core principle of Supporting Sustainable Economic Growth.			
	Paras 6.235-6.238 Modern			

	<p>infrastructure gives a competitive advantage</p> <p>Para 6.246 - Sufficient land to meet public services should be zoned in LDP's</p> <p>Para 6.250 – New power lines should avoid AONB's</p>			<p>seeks to minimise accumulations in protected areas.</p> <p>New Supplementary Planning Guidance</p>
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Chapter 3: Renewable Energy

Contents

3.0 Introduction to Renewable Energy	1
3.1 Policy Context	2
3.2 Preferred Options Paper	10
3.3 District Profile – Renewable Energy	13
3.4 Consultee and Councillor Engagement	17
3.5 Draft Plan Strategy Approach	18
3.6 Soundness	20
3.7 Evolution of Policies	21

Tables

Table 1: Cross Boundary Context	7
Table 2: Soundness	20
Table 3: Evolution of Policies	21

Figures

Figure 1: Breakdown of applications for renewable generation 2023/24 by mode	13
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3.0 Introduction to Renewable Energy

- 3.0.1 This Chapter brings together the evidence base that has been used to inform the development of the policies relating to renewable energy and low carbon technology contained in the Draft Plan Strategy.
- 3.0.2 Greater use of renewable energy technologies will reduce our dependence of imported fossil fuels and bring diversity and security of supply to our energy infrastructure. Northern Ireland has significant renewable energy resources and a vibrant renewable energy industry that makes an important contribution towards achieving sustainable development and is a significant provider of jobs and investment across the region. It will also help Northern Ireland to achieve its targets for reducing carbon emissions.
- 3.0.3 However developing renewable energy sources presents a number of issues and challenges dependent on the type of technology and the proposed location of the development. It is important that the Plan facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve NI's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance.

3.1 Policy Context Regional Policy

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

- 3.1.1 Successive Executives have placed a high emphasis on developing renewable energy resources in order to help achieve NI's obligations towards international climate change objectives, diversify supply away from imported sources and improve energy security. The latest PfG was agreed by the Executive on 27 February 2025.
- 3.1.2 The PfG sets out 9 priority areas, the following relate to renewable energy
- "Grow a globally competitive and sustainable economy," decarbonisation is listed as one of the 4 key challenges, it is aimed to achieve self-sufficiency and become an exporter of renewable energy through utilising resources such as biomethane and geothermal, as well as publishing a Circular Economy Strategy and changing electricity grid connection policy to lower the cost of connecting new infrastructure such as EV charging points.
 - "Protecting Lough Neagh and the Environment," a Climate Action Plan is to be developed which will work towards achieving Net Zero through energy independence and better insulated homes.

The Regional Development Strategy 2035

- 3.1.3 The RDS provides an overarching strategic planning framework to facilitate and guide the public and private sectors and ultimately shall influence Council decisions and investments.
- 3.1.4 The RDS sets out 8 aims, the most relevant of which for renewable energy are:
- Protect and enhance the environment for its own sake;
 - Take actions to reduce our carbon footprint and facilitate adaption to climate change;
- 3.1.5 In the Strategic Guidance, RG5 states "Deliver a sustainable and secure energy supply." While RG9 states "Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality." The most relevant parts to this paper are set out in paragraph 3.26 titled "Mitigation;"

Shaping our Electricity Future: Preparing for at least 70% Clean Electricity by 2030²⁷

- 3.1.6 The above strategy was published by SONI which operates the electricity transmission system in NI, in March 2021 in response to the then Economy Minister setting a target for achieving 70% of NI's energy from renewable sources by 2030 (termed "70 by 30"). The document outlined how additional investment is needed to transition the network away from the traditional model of large, thermally powered generators feeding into it, to one in which many smaller, renewables-based generators connect into it across the entirety of the region. The preferred model is the "Generation led approach" in which the development of new sources is guided by the strength of the grid and the demand for power near the preferred site.

Northern Ireland Sustainable Development Strategy 'Everyone's Involved' 2010²⁸

- 3.1.7 Paragraph 5.16 of the SPPS requires Councils, in preparing LDP's, to take account of the Sustainable Development Strategy for Northern Ireland. The aim of the strategy was to identify and develop actions that will improve the quality of life for us and for future generations.
- 3.1.8 It identified six guiding principles two of which are of relevance to this paper: 'Living within Environmental Limits' and 'Achieving a Sustainable Economy'. Six priority areas and associated actions were also identified. These are: reduce greenhouse gas emissions; increase the proportion of energy derived from renewable sources; implement energy efficiency measures, particularly for vulnerable groups; increase energy security; and adapt to the impacts of climate change. In order to implement these measures, Government Departments were required to set out in their strategic plans and strategies how each of them would contribute to achieving its objectives.

Strategic Planning Policy Statement (SPPS)

- 3.1.9 The SPPS was adopted in September 2015, it provides a framework for the replacement of the retained Planning Policy Statement by the Local Development Plans of Councils. It also states that a central challenge in furthering sustainable development is mitigating and adapting to climate change, whilst improving air quality. It notes this includes the need to reduce emissions of greenhouse gases that contribute to climate change and to respond to the impacts brought about by climate change. It outlines how the planning system should help to mitigate and adapt to climate change.

²⁷ [SONI - Shaping Our Electricity Future](#)

²⁸ [Northern Ireland Sustainable Development Strategy "Everyone's Involved"](#)

- 3.1.10 Three Regional Strategic Objectives for renewable energy are set out;
- Ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed;
 - Ensure adequate protection of the region's built, natural, and cultural heritage features; and
 - Facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar Design.
- 3.1.11 Paragraph 6.223 states a cautious approach for renewable development proposals will apply in designated landscapes which are of significant value such as AONB's and their wider settings. It states further that in such sensitive landscapes it may be difficult to accommodate renewable energy proposals, including wind turbines without detriment to the region's cultural and natural heritage assets. In addition, paragraph 6.320 in relation to Waste Management, establishes a Waste Hierarchy which sets out 5 methods for waste management in descending order of preference, the fourth method is "other recovery, e.g. energy from waste."
- 3.1.12 The Department for Infrastructure announced a review of the Renewable Energy provisions of the SPPS and published a draft document on April 6th, 2023. The consultation period has now closed, and it is expected that the Department will publish the outcome of the review in due course. The Draft document highlights the need to increase the amount of renewable energy being produced in order to achieve the new target set out in the Northern Ireland Climate Change Act of 80% of energy coming from renewable sources by 2030 and to achieve Net Zero by 2050.
- 3.1.13 The document outlined that on the latest available figures, the share of NI's energy coming from renewable sources was now 51%.²⁹ Paragraph 1.9 of the document requires Councils to identify areas in their LDP's which are most appropriate for renewable energy developments, and to provide detailed locational criteria. In such areas a presumption in favour of renewable energy developments will apply, however in areas designated for their landscape value, such as AONB's, a cautious approach will continue to apply, especially in relation to visually dominant proposals which should be avoided in such landscapes.
- 3.1.14 Paragraph 1.17 encourages the use of previously developed land of low ecological value for solar farms, paragraph 1.19 introduces a policy presumption for the renewal and life extension of renewable energy systems, through the replacement of older equipment with newer, more efficient systems, (a process termed "repowering.")

²⁹ [Electricity Consumption and Renewable Generation in Northern Ireland](#)

Planning Policy Statement 18 – Renewable Energy³⁰

- 3.1.15 PPS18 was published in August 2009, its aim is “to facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve Northern Ireland’s renewable energy targets and to realise the benefits of renewable energy.”
- 3.1.16 In support of this aim three objectives were set out;
- to ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed;
 - to ensure adequate protection of the Region’s built and natural, and cultural heritage features; and
 - to facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar Design.
- 3.1.17 Two operational policies for the determination of relevant planning applications were set out. Policy RE1 – Renewable Energy, this set out general criteria in relation to all applications for renewable energy generation, as well as sub-section relating to wind energy. Paragraph 4.3 of the supporting text emphasised that renewable energy technologies are constantly being researched and that proposals from such technologies which become viable following the publication of the policy will be assessed against its provisions.
- 3.1.18 Policy RE2 – Integrated Renewable Energy and Passive Solar Design, seeks to incorporate integrated renewable energy technologies and principles such as passive solar design into new buildings, and where appropriate, their retrofitting to existing buildings. Three types of development are identified as providing the greatest opportunity for this;
- large-scale urban development (generally defined for the purposes of this policy as a site of 1ha or greater or a building of 5,000m² or greater);
 - public sector development; and
 - development in the countryside including individual dwellings.

Supplementary Planning Guidance

- 3.1.19 A number of documents have been published to provide additional guidance for assessing planning applications for renewable energy projects;
- Best Practice Guidance to PPS18 Renewable Energy³¹

³⁰ [Planning Policy Statement 18 - Renewable Energy](#)

³¹ [Best Practice Guidance to PPS 18 'Renewable Energy'](#)

- Wind Energy Development in Northern Ireland's Landscapes³²
 - Draft Supplementary Planning³³ Guidance to PPS18 Renewable Energy – Anaerobic Digestion.

Local Policy Context

Existing Area Plans

- 3.1.23 The District is currently covered by two Area Plans, both of which are now beyond their end date;
- Ards-Down Area Plan 2015 (Adopted March 2009)
 - Banbridge-Newry and Mourne Area Plan 2015 (Adopted October 2013)
- 3.1.24 Neither plan contains policies specific to renewables, instead identifying PPS18 as the appropriate operational policy.

Newry Mourne and Down District Council Corporate Plan 2024-2027

- 3.1.20 The Councils mission is to "To deliver sustainable services and empower our communities through transparent governance and collaboration". The Corporate Plan incorporates the outcomes set out in the Community Plan into its vision for the district and sets 8 objectives for the Council in achieving these. One of these relates to renewable energy, "Enhance, protect and promote our environment to ensure a sustainable future."

Newry Mourne and Down District Council – Community Plan 2030 "Living Well Together"

- 3.1.21 The Community Plan is the overarching strategic plan for integrated planning and delivery of services in Newry Mourne and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards achieving its outcomes. Section 8 of the Local Government Act 2014, (as amended) requires the Council to take its Community Plan into account in LDP preparation. The LDP team has therefore formulated the Draft Policies in order to contribute towards the achievement of these outcomes.
- 3.1.22 The Community Plan sets 5 outcomes for the life conditions that it seeks to achieve for Newry Mourne and Down, among these are "All people in Newry, Mourne and Down benefit from a clean, quality and sustainable environment." Among the indicators that will demonstrate how this outcome is achieved are "Level of Sustainable Energy," and "Level of Quality Housing."

³² [Wind Energy Development in Northern Ireland's Landscapes](#)

³³ [Draft Supplementary Planning Guidance - PPS18 'Anaerobic Digestions'](#)

Cross Boundary Policy Context

- 3.1.25 The current situation in relation to LDP policies on Renewable Energy in the neighbouring Councils is set out below.

Table 1: Cross Boundary Policy Context

Neighbouring Council	Position
Ards and North Down Borough Council	Ards and North Down Borough Council published its Preferred Options Paper in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the preferred options, there are two that relate to Renewables, KY4 "Facilitate the siting of renewable energy generating facilities in appropriate locations" the preferred option being "Consider all renewable energy proposals coming forward on a case by case basis whilst adopting the 'cautious approach' within designated landscapes as endorsed by the SPPS," while KY5 "On-site renewable generation and reduced energy consumption in new developments" with the preferred option being "Introduce policy requiring applicants to demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated in all proposals for new development."
Lisburn and Castlereagh City Borough Council	Lisburn and Castlereagh City Council published its adopted Local Development Plan in September 2023. Objective F of the Spatial Strategy is titled "A Connected Place" among the actions listed is "Support renewable energy infrastructure while affording protection to the environment." Strategic Policy 1 – Sustainable Development emphasises that sustainable development recognises that there is a need to reduce emissions of greenhouse gas. Strategic Policy 21 – Renewable Energy, seeks to facilitate the development of renewable energy generating facilities while minimising potential visual intrusion and environmental impacts. There are two Operational Policies, RE1 which relates to renewable energy proposals, and RE2 – Integrated Renewable Energy which seeks

	to encourage the use of renewable energy technologies in both new and existing developments.
Armagh City, Banbridge and Craigavon Brough Council	Armagh City, Banbridge and Craigavon Borough Council published its Preferred Options Paper in March 2018. Key Issue ENV9 relates to Renewable Energy, the preferred option is to "An approach to renewable energy development in line with existing policy, but in addition, identify areas of sensitive landscape which may be unsuitable for particular forms of renewable energy development."
Louth County Council, Republic of Ireland	Louth County Council published its Development Plan in September 2021. Chapter 10 is titled "Infrastructure and Other Utilities." The overall aim is "Support County Louth's strategy for targeted population and strong economic growth in line with national and regional objectives through protection, improvement and extension of water services infrastructure, and flood alleviation services throughout the County, in conjunction with other statutory bodies. Encourage and support energy and communication efficiency to achieve a reasonable balance between responding to EU and national policies on climate change, renewable energy, communications and enabling resources to be harnessed in a sustainable manner in accordance with the future proper planning and development of the County." The policy objectives provide guidance as to how such developments are to be assessed, they also seek to encourage the inclusion of technologies such as active and passive solar design, rainwater harvesting and heat pumps into new developments. Chapter 12 of the Plan is titled "Climate Action," in particular it emphasises the role that solar energy can play in increasing the amount of energy generated by renewable sources, the policy objectives seek to encourage the increased use of solar and wind energy technologies for on-site consumption while encouraging more energy efficiency measures.

Monaghan County Council	Monaghan County Council published the Interim Version of its County Development Plan on 26 May 2025. Chapter 8 relates to Energy and it includes Environment, Energy and Climate Change Strategic Objective EECCSO1 which lists “the promotion of reduced energy consumption, energy efficiency and renewable energy to deliver a low carbon future for County Monaghan,” There are 12 objectives for Renewable Energy which seek to promote the generation of energy from renewable sources and to incorporate Passive Solar Design and other technologies in all new developments.
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- 3.1.26 As part of the preparation of the Draft Plan Strategy, the LDP Team has held discussions with DfI and the LDP Teams of all the neighbouring Councils at which the different issues encountered by them have been discussed and the rationale behind the chosen policy approaches have been set out. These have been used by the LDP Team to inform its own policy recommendations on these issues.
- 3.1.27 The Council considers that it’s Draft Policies are consistent with Regional Policy and the adopted LDP strategies of adjoining authorities as they seek to facilitate the provision of new infrastructure while minimising and mitigating adverse impacts on the natural and built environment and require that new developments are “future proofed” to allow for the installation of new technologies at a later date with the minimum of work.

3.2 Preferred Options Paper

- 3.2.1 The Council published the Preferred Options Paper (POP) as the first stage in the preparation of the LDP on 29 May 2018. Paragraph 4.5 set out the Strategic Objectives for the LDP, one of the two economic objectives is “Supporting the Transportation Network and Other Infrastructure.” under this objective the following goal is outlined;
- Support renewables development while protecting the environment
- 3.2.2 As part of the process of preparing the POP a Preliminary Review of Operational Planning Policy was carried out which drew upon operational experience and changes in regional planning policy to identify issues to be addressed through the preparation of the LDP.

- 3.2.3 The POP identified 24 Key Issues, provided suggested options for addressing them and identified the Council's preferred option for each Key Issue.
- 3.2.4 Key Issue 9 related to Integrated Renewable Energy and Passive Solar Design, it set out 3 suggested options, the preferred option being 'the integration of renewable energy and/ or passive solar design should be a requirement in certain new development e.g. public sector and on private developments over a certain threshold.' The suggested thresholds being larger residential developments and in non-residential schemes over one hectare or buildings over 1000sqm. Developments in the Countryside were highlighted as being particularly suitable for the incorporation of these measures.
- 3.2.5 A period of public consultation was carried out over the next 12 weeks. A number of responses from the public and statutory consultees were received in relation to this key issue. Ten of the public responses agreed with the Council's preferred option, 14 disagreed and 8 held mixed views. Comments received included:
- Further consideration should be given to the thresholds and evidence base for these;
 - Inclusion of 'where possible' so as to not preclude development;
 - case by case basis rather than thresholds so as to not penalise larger developers and developments;
 - Requirements are straying beyond planning control- additional costs will discourage building and negatively impact on affordability of homes;
 - Should be employed in dwellings within settlements and small residential schemes;
 - Sends a strong signal that decarbonisation is a priority for the Council;
 - Integrate micro renewables into all planning applications;
 - Policy should be abandoned in favour of geothermal heating and insulation enhancement of new and existing building stock;
 - Over a prolonged period of time integration of renewable energy into all dwellings may help address above average levels of fuel poverty;
 - Public sector should be leading the way in becoming more sustainable and reducing their carbon footprint;
 - All new buildings should be built to the highest energy efficiency standards;
 - Renewable energy systems for homes are not affordable for low income families who are most likely to be affected by fuel poverty;
 - Criticism of the illustration of PSD in a dwelling house on grounds that it was a poor example of this technology.
- 3.2.6 Key Issue 18 of the POP addressed the issue of Renewable Energy. The preferred option was to adopt the current policy-based approach as set

out in PPS 18 and the SPPS rather than identify areas of constraint with the justification being that to do so could further restrict development of renewable energy when there is currently no evidence to suggest they are required

- 3.2.7 The majority of public respondents on this issue agreed with the Council's preferred option. However, a number disagreed and raised a number of points in relation to areas of constraint including how they would provide clarity to prospective developers and reassurance to local communities and would be in line with the SPPS 'cautious approach' to renewable energy proposals within designated landscapes.
- 3.2.8 Other points raised included:
- Areas of Constraint should be introduced in Slieve Gullion and the Mourne;
 - Applying a broad brush approach where renewable energy proposals are acceptable/ unacceptable cannot be tailored to specific renewable proposals;
 - Council should undertake a spatial mapping exercise to identify the optimal locations and potential output for different technologies;
 - Potential of geothermal energy from granite;
 - Need to engage further with SONI to increase transmission network in the district;
 - Consideration should be given to hydropower development;
 - Council should consider greater opportunities for off-shore renewable energy and;
 - In bringing forward policy Council should provide clarification to the SPPS wording in respect of social benefits of renewable energy projections and the weight that can be attached to them.
- 3.2.9 Responses from statutory agencies and other concerns are summarised below;
- NIEA Natural Heritage and Historic Environments Division, concerns as to how the Council proposed to control renewable energy development within the AONB's, they consider that Areas of Constraint would aid the identification of sensitive landscapes unsuitable for renewable energy development and also expressed concern regarding the cumulative impact of renewable energy structures including tall structures, solar fields and general ground works in the vicinity of heritage assets and the wider historic environment.
 - DfI Strategic Planning Directorate noted that the Council's data illustrates that the area is not subject to significant pressure from renewable energy projects. It further noted that over half of the District is covered by AONB designations and it encouraged that all types of renewable energy be considered of the need, or not, to designate Areas of Constraint.

- DfI Rivers highlighted that hydroelectric power generation schemes can significantly increase flood risk. They can also completely alter the flow of a river and should not be sited within catchments with a flow gauging station.
- NIHE stated it would support the mapping of areas where renewable energy projects would be acceptable/unacceptable. They further stated they would like to see the LDP include energy strategies/masterplans which identify locations for renewable energy supply, policies aimed at reducing consumption and comprehensive supplementary guidance.
- SSE Airtricity which supported the Council's preferred option stating that the current policy-based approach set out in PPS18 and the SPPS was fair, and allowed proposals for renewable energy to be considered on their individual merits.
- SONI noted the POP's emphasis on renewables most of which are of a small scale and connect to the 11Kv transmission systems. It welcomed paragraph 2.37 of the POP which stated the Council will liaise with both SONI and NIE to ensure the policies and designations within the LDP will be supported by the District's grid infrastructure and it will continue to be developed and enhanced to meet the District's needs.

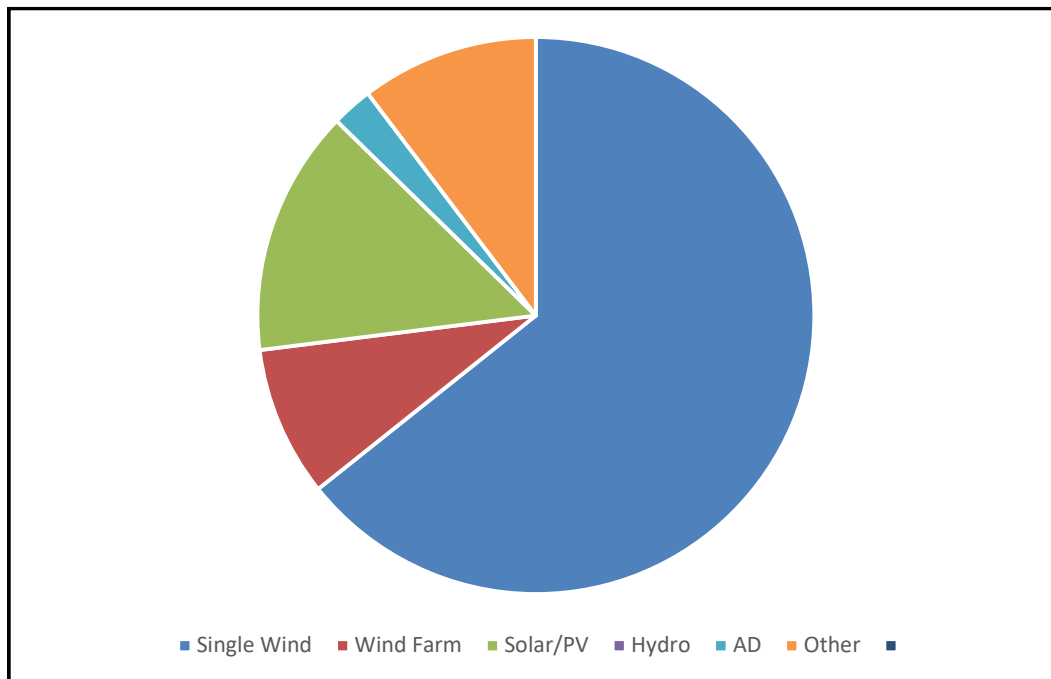
3.3 District Profile - Renewable Energy

- 3.3.1 Renewable Energy now accounts for 51% of Northern Ireland's energy³⁴ the continued harnessing of potential renewable resources is essential to ensure that NI achieves its climate change targets. According to the most recently available annual Planning Statistics,³⁵ 126 applications for renewable energy developments were received, with 87 approved, compared to 121 and 82 respectively in the previous year.
- 3.3.2 The largest single mode of received applications was wind energy with 92 (81 single turbine, 11 wind farms) followed by solar/PV with 18.

³⁴ [Electricity Consumption and Renewable Generation in Northern Ireland 2023](#)

³⁵ [DfI Planning Statistics Bulletin 2023-24](#)

Figure 1: Breakdown of applications for renewable generation 2023/24 by mode



(Source DfI Planning Statistics)

Wind Energy

- 3.3.3 Wind energy has long been the most common mode of renewable energy generation in Northern Ireland, like other modes it can be harnessed at both domestic and commercial scales. The majority of approvals have been for single turbines serving a domestic dwelling or a business, particularly in rural areas, however, there have been a number of large scale wind farm developments in other parts of NI. The policy defines “wind farm” as being a development consisting of two or more turbines.
- 3.3.4 The main planning consideration with wind energy is the visual impact associated with the masts, this is particularly acute in scenic landscapes, many of which have a strong character defined by their unspoilt nature. There are a range of other issues such as “shadow flicker” caused by spinning blades blocking sunlight, “ice throw” in wintry conditions, noise and vibration and impact on wildlife. Many of these issues do not occur with large scale windfarms due to their location in remote, upland areas far from occupied properties, but can occur with single turbines, in lower lying and more populated rural areas. Planning policies has always contained a range of measures for assessing such potential impacts on amenity, with careful and considerate siting a single turbine of a significant size can operate in such an area with minimal impacts on neighbours
- 3.3.5 All modes of Renewable energy generation for commercial scale require a connection to the electricity grid, these can often require high voltage

overhead lines which are visually prominent in their own right. Measures should be taken to minimise the need for such lines, such as the sharing of connections systems where feasible, in particular for renewables developments in Special Countryside Areas, connecting infrastructure should be provided underground unless the applicant can demonstrate that this is not feasible or would have greater environmental impacts than an overhead line.

- 3.3.6 Wind Energy can also be harnessed in offshore locations by turbines sited on platforms, the area off the District's coast has been identified as a possible location for an operational wind farm. While such a proposal would not require planning consent, any connecting infrastructure will, any such applications will be determined in accordance with the relevant planning policy.

Solar/Photovoltaic

- 3.3.7 Solar or photovoltaic energy generates electricity from arrays of solar panels, these can either be freestanding on open ground or can be mounted on buildings, they can also be sited above car parks or on the central reservations of major roads. Solar has a number of significant advantages over wind energy in that it can be installed in a greater range of locations, closer to end users, minimising the need for connecting infrastructure. With careful installation other activities can continue on the ground beneath the arrays, there are many instances of solar arrays being installed on agricultural land and the land still able to be cultivated for either livestock or crops. There is evidence that "agrivoltaics" can result in higher yields due to the shelter that the arrays can afford to livestock and crops.
- 3.3.8 The main drawback with solar arrays is the intense glare that can be caused by reflected sunlight, which is potentially very distracting to drivers and aircraft pilots. This can be minimized through careful siting and by planting hedges around the arrays, the arrays can also be installed in low lying areas which further minimises the potential glare. There has been a recent trend to utilise previously developed sites of low environmental quality such as disused quarries and landfills for solar farms, as the glare can be naturally contained within the pit. All applicants will be required to demonstrate how the potential for glare will be minimised and relevant authorities such as the Civil Aviation Authority will be consulted as appropriate.
- 3.3.9 Passive Solar Design is an approach that seeks to design and position buildings in such a way that they capture as much light and heat from the Sun as possible. Incorporating this approach can achieve a reduction in heating costs for residents and businesses.

Biogas/Anaerobic Digestion

- 3.3.10 Anaerobic Digestion (AD) is a process in which organic wastes are broken down by bacteria to produce a methane rich biogas which can be used to generate power. A wide range of organic wastes are suitable for this process, the most common is farm waste and there have been several approvals for plants on commercial farms that utilise the waste produced. Several farms will often share the costs of installing an AD plant between them to make the investment viable.
- 3.3.11 As AD plants are often significant structures they can have an adverse visual impact in the countryside but this can be mitigated with careful siting. There are other potential issues such as odour and pollution but these can be mitigated through proper management of the facility. Traffic travelling to and from the site can have an adverse impact on rural roads, for this reason, applicants will be required to set out that wastes will be sourced locally in accordance with "the Proximity Principle."

Hydropower

- 3.3.12 Water has been used to generate mechanical power for centuries, large scale hydroelectric generation occurs in many parts of the world. In recent years small scale hydroelectric generation (termed "microhydro") has become commercially viable. This involves diverting water from a river or stream down a channel where it spins a turbine to produce energy, the water is then discharged back into the watercourse. Among the advantages of this generation mode is that it doesn't produce any emissions and has limited visual impact.
- 3.3.13 There are however potential adverse impacts on aquatic life in the water course, there is also potential for increased flood risk, all applicants will be required to demonstrate how this will be mitigated and relevant bodies such as NIEA and Rivers Agency will be consulted on all applications. Policy RE1 does not include a dedicated sub-section on Hydropower as it is considered that the potential impacts specific to this mode can be assessed under the dedicated policies relating to flooding and natural environment.

Heat Pumps

- 3.3.14 Heat pumps are an increasingly common form of domestic heating, there are three types, named after the source involved, all operate on the principle of extracting naturally occurring thermal energy. The types are air source, which pass air over coils that extract thermal energy from it, ground source which circulates water into the ground where it is warmed by geothermal heat and water source which use pipes immersed in water.

- 3.3.15 Many of these systems are suitable for domestic use and can be installed under Permitted Development.

Battery Energy Storage Systems

- 3.3.16 BESS is a technology which stores energy produced during periods of low demand and high generation and releases it to end users during periods of high demand or low output. It is not a source of renewable energy but it is an increasingly important complement to renewable generation. As with wind and solar energy it can be utilised at both domestic and commercial scale.
- 3.3.17 NI's first operational commercial scale BESS facility was commissioned by Energia at the Castlereagh substation, using the existing infrastructure to connect to the grid.³⁶ Any applications for similar schemes in the District will be assessed under the relevant policies.

3.4 Consultee and Stakeholder Engagement

- 3.4.1 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, providers of public utilities 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.
- 3.4.2 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.
- 3.4.3 A Briefing Paper outlining the proposed text of the policies for inclusion in the Draft Plan Strategy was presented to the Council's Planning Committee on 22 September 2021. Following this briefing, members voted to agree the draft planning policies for inclusion in the Plan Strategy and authorised the LDP Team to amend the draft policies as necessary in response to consultee engagement.

3.5 Draft Plan Strategy Approach

- 3.5.1 The Draft Plan Strategy seeks to facilitate the development of renewable energy projects within the District, at both domestic and commercial scales and the incorporation of renewables and passive solar design into new developments as set out in the operational policies. It is in accordance with National and Regional Policy and also helps to implement the relevant sections of the Council's Community and Corporate Plans.

³⁶ [Energia Group](#)

- 3.5.2 The renewable energy policies have also been drafted to reflect the following objectives for the plan, as were set out in Table 3 in the draft Plan Strategy.
- Economic; To support renewables infrastructure whilst affording protection to the environment.
 - Environmental; To protect our sensitive landscapes from inappropriate development.
- 3.5.3 The Spatial Growth Strategy contains a Renewable Energy and Low Carbon Technology Strategy that seeks to promote both the development of a diverse range of renewable energy sources in appropriate locations and to incorporate energy efficiency measures and renewable energy technologies in new developments.
- 3.5.4 There are two operational policies in the Draft Plan Strategy, both largely update and where necessary expand upon the existing policies set out in PPS18. Policy RE1 – Renewable Energy has general criteria that relate to all applications for renewable energy generation, in comparison to PPS18 two new criteria have been introduced into this section, one for transport safety and the other in relation to flood risk. The first is intended to provide guidance in relation to potential risks to drivers and pilots from glare reflected off solar arrays. The second is to ensure that microhydro projects do not cause unacceptable flood risks, no dedicated sub-heading for this mode of generation is proposed as it is considered that the dedicated policies for flooding and natural environment in the Plan Strategy, adequately address the potential issues. A microhydro proposal which fails to meet the criteria of these policies will also automatically fail the requirements of RE1.
- 3.5.5 Dedicated subsections have been introduced for both solar/photovoltaic systems and anaerobic digestion, this is in recognition that both modes are becoming more prevalent and have particular planning issues that justify such an approach. For solar/photovoltaic it is the potential impact from glint and glare which will require the submission of dedicated assessments, for anaerobic systems, it is the need to minimise impacts on the countryside and residents from pollution, noise and odours, and to require that the feedstock for plants is suitable and is sourced locally in accordance with “The Proximity Principle” in order to prevent unsuitable materials being transported over long distances.
- 3.5.6 The supporting text of the policy builds upon the existing regional policy providing additional guidance for assessing planning applications and setting out how applicants must include programs for the decommissioning of a site and its restoration to an agreed standard after the end of their operating lives. However, it also recognises that it is possible to upgrade the generating equipment in order to extend the operating life of the facility, a process termed “repowering,” and that this is often preferable than allowing the development of a new site on

undeveloped land. Proposals for repowering/life extension will be determined under the policy regime prevalent at that time.

- 3.5.7 The supporting text carries over paragraph 4.3 of PPS18 which highlighted that new generation technologies are constantly being researched and developed, and any not covered by the policy text will be assessed against the general criteria of Policy RE1. This is intended to “future proof” the policy so that the plan is flexible to assess proposals for any new generation mode that becomes commercially viable during its life.
- 3.5.8 Draft Policy RE2 Renewable Energy and Energy Efficiency Measures in New Development, builds upon the existing policy in PPS18, and expects all new developments, to incorporate, where appropriate, microrenewable technologies such as solar/PV and heat pumps as well as principles of passive solar design. Many domestic scale renewable systems fall within the definition of Permitted Development and therefore in many cases planning permission is not required.

3.6 Soundness

- 3.6.1 The LDP has been prepared to achieve the indicators of soundness as set out in the DfI Development Plan Practice Note: Soundness (Version 2, May 2017). The Draft Plan Strategy, in relation to the renewable energy subject policies and other relevant policies in this document is regarded as sound, as it is considered they have met the tests of soundness as summarised below:

Table 2: Soundness

Procedural Tests	
P2	The Council’s Renewable Energy policies have been developed from and evolved from the POP, POP Consultation Report, Consultee and Councillor Engagement.
P3	The Renewable Energy policies have been subject to a Sustainability Appraisal.
Consistency Tests	
C1	The Renewable Energy strategy and policies has taken account of the Regional Development Strategy, in particular Strategic Guidance RG5 and RG9, as set out in paragraph 3.1.8 of this Chapter.
C2	The Renewable Energy and Low Carbon Technology Strategy and Policies RE1 and RE2 have taken account of the Council’s Community Plan and the Corporate Plan, it provides a framework for the determination of planning applications to provide increased capacity for renewable energy in appropriate locations and to incorporate microrenewables and energy efficiency measures in new developments

	to meet the objectives of these documents as per paragraphs 3.1.21-3.1.22 of this Chapter.
C3	The Renewable Energy and Low Carbon Technology Strategy and Policies RE1 and RE2 have taken account of the provisions of the Strategic Planning Policy Statement as it relates to the provision of Renewable Energy, as per paragraphs 3.1.9-3.1.14 of this Chapter.
C4	The Renewable Energy and Low Carbon Technology Strategy and Policies RE1 and RE2 have been developed by taking account of the existing development plans and Council strategies relating to renewable energy within Newry, Mourne and Down area as per paragraphs 3.1.23 – 3.1.24.
Coherence and the effectiveness tests	
CE1	The LDP has been developed alongside other Councils emerging and adopted LDP's and no conflict has been identified as per paragraphs 3.1.25 – 3.1.27 of this Chapter.
CE2	The Renewable Energy and Low Carbon Technology Strategy and Policies RE1 and RE2 have been prepared on a sound evidence base, drawing on the baseline information set out in LDP Preparation Paper 9, which has been updated as required during the preparation of this Chapter.
CE3	Annual monitoring is not considered necessary as it is anticipated that the developers of large-scale renewable energy projects will make their requirements known through the preparation of the Local Policies Plan, or where necessary, the Development Management Process.
CE4	The Renewable Energy and Low Carbon Technology Strategy and Policies RE1 and RE2 will be reviewed at Plan Review Stage.

3.7 Evolution of Policies

Table 3: Evolution of Policy

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy RE1 – PPS18. Provides guidance for the assessment of proposals for renewable energy generation</p> <p>Policy RE2 – PPS18. Seeks to incorporate microgeneration technologies and Passive Solar Design in new developments</p> <p>Supplementary Planning Guidance PPS18 Best Practice Guidance; Wind Energy Development in Northern Ireland's Landscapes; Draft SPG Anaerobic Digestion</p>	<p>RDS –RG5 "Deliver a sustainable and secure energy supply."</p> <p>RG9 "Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality."</p> <p>SPPS -Para 6.223 "Cautious approach in designated landscapes such as AONB's,</p> <p>SPPS Review – Para 1.17 Encourages use of previously developed land of low ecological value for solar power.</p> <p>Para 1.19 Introduces policy presumption for renewal and life extension of renewable energy generations sites including repowering.</p>	<p>KY9 Integrated Renewable Energy and PSD should be a requirement in certain new developments.</p> <p>KY18 Adopt current approach from regional policy but not designate Areas on Constraint on Renewable Energy Development</p>	<p>Public – Generally favourable however some criticism that more should be required</p> <p>DfI Notes that evidence base shows the District has not seen significant large scale renewables development</p> <p>NIEA Concerned over lack of Areas of Constraint</p> <p>Rivers Hydroelectric schemes can cause increased flood risk</p> <p>NIHE Would prefer to see suitable areas for Renewables development identified.</p>	<p>Renewable Energy and Low Carbon Technologies Strategy</p> <p>RES1 Promote the development of RE generation in appropriate locations and promote to incorporation of microgeneration and PSD in new developments</p> <p>Policy RED1 – Renewable Energy, replaces RE1, new criteria for flood risk and transport safety and dedicated sub-sections for solar/PV and anaerobic digestion included</p> <p>Policy RED2 Replaces RE2 and seeks to promote microgeneration and PSD</p> <p>New Supplementary Planning Guidance</p>

Chapter 4: Waste Management

Contents

4.0 Introduction to Waste Management	1
4.1 Policy Context	2
4.2 Preferred Options Paper	10
4.3 District Profile – Waste Management	11
4.4 Consultee and Councillor Engagement	13
4.5 Draft Plan Strategy Approach	14
4.6 Soundness	16
4.7 Evolution of Policies	17

Tables

Table 1: Cross Boundary Policy Context	7
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Figures

Figure 1: Waste Hierarchy	3
Figure 2: Waste arising per council 2023-24	11
Figure 3: Household waste landfilled by Councils 2023-24	12

4.0 Introduction to Waste Management

- 4.0.1 This Chapter brings together the evidence base that has been used to inform the development of the policies relating to Waste Management contained in the Draft Plan Strategy.
- 4.0.2 The collection and disposal of waste from residential and commercial sources is an important function of government, failure to carry this function out in a sustainable manner can have significant adverse impacts on public health and environmental quality. Planning plays a key role in ensuring that the processing of waste after it has been collected from its sources is carried out in a way that prevents these adverse impacts from occurring.
- 4.0.3 The collection and sustainable processing of waste is a significant source of employment and therefore the successful implementation of waste management policies can support the economic development of the District.

4.1 Policy Context

Regional Policy Context

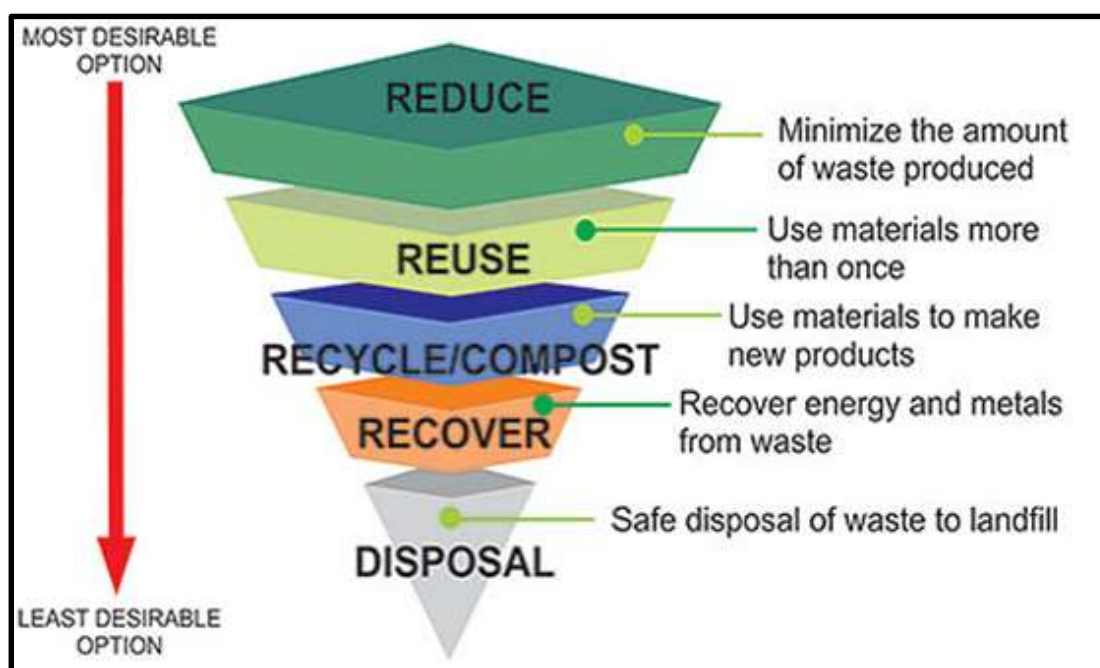
NI Executive Draft Programme for Government 2024-2027 – ‘Doing What Matters Most’

- 4.1.1 The Programme for Government (PfG) was agreed by the Northern Ireland Executive on February 27th 2025.
- 4.1.2 The PfG sets out 4 themes under which a number of priority areas are identified, in these areas the current issues and a number of measures to address them are listed. It contains a commitment to publishing a Circular Economy Strategy, one of the three key principles of which will be ‘Designing Out Waste.’

Regional Development Strategy 2035

- 4.1.3 The RDS provides an overarching strategic planning framework to facilitate and guide the public and private sectors and ultimately shall influence Council decisions and investments.
- 4.1.4.1 The RDS sets out 8 aims, the most relevant of which for waste management are;
 - Protect and enhance the environment for its own sake;
 - Take actions to reduce our carbon footprint and facilitate adaption to climate change;
- 4.1.5 Regional Guidance RG10 of the RDS entitled “Managing our Waste Sustainably” is directed by the Waste Framework Directive (WFD) (2008/98/EC) which provides the overarching legislative framework. Article 4 of this Directive sets out a ‘Waste Hierarchy’ as a priority order for waste management. The primary purpose of the Waste Hierarchy is to minimise adverse environmental effects of waste and to increase resource efficiency in waste management and policy.
- 4.1.6 The Waste Hierarchy seeks to minimise the amount of waste brought to landfill through reducing, reusing and recycling waste. Waste disposal should only happen as a fifth and final option (Figure 1).

Figure 1: Waste Hierarchy



(Source Position Paper 9)

- 4.1.7 To manage waste sustainably RG10 promotes the use of the 'proximity principle' which emphasises the need to treat or dispose of waste as close as possible to the point of generation in order to minimise the negative effects of waste transportation including the carbon emissions generated through vehicle use.

Northern Ireland Sustainable Development Strategy "Everyone's Involved"

- 4.1.8 The SDS was first published on 27 May 2010, it's provisions have been used to inform the preparation of successive Programmes for Government and Council LDP's. One of the key principles of the SDS is that the environment is a finite resource and waste management is one of the activities which must be conducted in recognition of the need to live within the limits it imposes. Among the strategic objectives of the SDS is 4.7 "Reduce the total quantity of waste going to landfill."

NI Waste Management Strategy "Delivering Resources Efficiently"³⁷

- 4.1.9 The WMS was first published in 2013 and set the framework and target for reducing waste by 2020. In June 2022 DAERA published the "Closure Report" on the end of the governance arrangements for this strategy ahead of the commencement of work on its replacement. The report found that of the 27 actions and 17 targets set out 82% of them had

³⁷ [DAERA - Waste Management Strategy NI](#)

been achieved by 2020, in particular the amount of biodegradable waste going to landfill had fallen by 35% of 1995 levels and 50% of household waste was now being recycled.

- 4.1.10 Preparation of the New Waste Management Strategy is now underway, any implications for the Plan Strategy can be incorporated into the document during the Examination in Public or in the statutory review.

Arc21 Waste Management Plan³⁸

- 4.1.11 Arc 21 is an umbrella waste management group for 6 councils in the east of Northern Ireland, of which the Council is a member. Arc21's aim is to encourage households and businesses to 'Reduce, Re-use and Recycle' as much as possible, and deliver new waste infrastructure facilities to manage waste efficiently and in an environmentally friendly manner.
- 4.1.12 The group's waste management plan was determined by the then Department of the Environment in September 2015. It provides a framework for waste management provision and a regional network of facilities for all controlled wastes within the member councils. It also provides criteria to be used in the selection of sites for waste management facilities.

Strategic Planning Policy Statement (SPPS)

- 4.1.13 The SPPS was adopted in September 2015, it provides a framework for the replacement of the retained Planning Policy Statements by the Local Development Plans of Councils. One of its four Core Planning Principles is "Improving Health and Well-Being," this has a sub-section "Safeguarding Residential and Work Environs" this lists waste management as one of the adverse environmental impacts associated with development that can harm health and well being.
- 4.1.14 Another of the Core Planning Principles is "Preserving and Improving the Built and Natural Environment," although there is no direct reference to waste management in the supporting text, the potential adverse impacts of unsustainable waste management can adversely affect the natural environment and cause severe pollution.
- 4.1.15 Three Regional Strategic Objectives for waste management are set out in paragraph 6.310;
- promote development of waste management and recycling facilities in appropriate locations;
 - ensure that detrimental effects on people, the environment, and local amenity associated with waste management facilities (e.g. pollution) are avoided or minimised; and

³⁸ [ARC21 - Waste Management Plan](#)

- secure appropriate restoration of proposed waste management sites for agreed after-uses.
- 4.1.16 The SPPS also sets out Regional Strategic Policy which includes a sequential test of suitable locations for waste management facilities, such locations should be accessible from the key transport corridors identified in the RDS, LDP's should identify the need for appropriate facilities within new developments and a presumption in favour of waste collection and treatment and disposal facilities will apply where a need for such a facility has been identified through a waste management plan. All potential impacts of existing and proposed facilities should be taken into account in order to keep incompatible land uses separate and development in the vicinity of such facilities should only be permitted where it would not prejudice the operation of the facility or adversely impact people, transport or the environment.
- 4.1.17 Finally paragraph 6.320 sets out the Waste Hierarchy which sets out 5 methods for waste management in descending order of preference, the fourth method is "other recovery, e.g. energy from waste." This is a reference to the production of biogas through anaerobic digestion and it highlights how successful and sustainable waste management practices can help to achieve other objectives.

Planning Policy Statement 11 – Planning and Waste Management³⁹

- 4.1.18 PPS11 was published in December 2002, it set out the objectives for waste management as being;
- promote the development, in appropriate locations, of waste management facilities that meet a need as identified by the relevant WMP, or as demonstrated to the Department's satisfaction in the case of wastewater treatment works (WWTWs);
 - ensure that detrimental effects on people, the environment, and local amenity associated with waste management facilities are avoided or minimised; and
 - secure appropriate restoration of proposed waste management sites for agreed after-uses.
- 4.1.19 The PPS set out 5 operational policies for the determination of planning applications for waste management facilities, Policy WM5 related to applications in the vicinity of waste management facilities or Waste Water Treatment Works and sought to prevent developments which would be subject to unacceptable adverse impacts from the presence of a pre-existing facility, unless the impacts could be successfully mitigated.

³⁹ [PPS18 - Planning and Waste Management](#)

Local Policy Context

Existing Area Plans

- 4.1.20 The District is currently covered by two Area Plans, both of which are now beyond their end date;
- Ards and Down Area Plan 2015 (Adopted March 2009)
 - Banbridge, Newry and Mourne Area Plan 2015 (Adopted October 2013)
- 4.1.21 Neither plan contains policies specific to waste management, instead referring to the role of the then Councils and the waste management plans that they were part of.

Newry Mourne and Down Council Corporate Plan 2024-2027

- 4.1.22 The Councils mission is to “To deliver sustainable services and empower our communities through transparent governance and collaboration”. The Corporate Plan incorporates the outcomes set in the Community Plan into its vision for the District and sets 8 objectives for the Council in achieving these. One of these relates to waste management, “Enhance, protect and promote our environment to ensure a sustainable future.”
- 4.1.23 The Corporate Plan also states that in 2022/23, 50.3% of household waste in the District was recycled.

Newry Mourne and Down District Council – Community Plan 2030 “Living Well Together”

- 4.1.24 The Community Plan is the overarching strategic plan for integrated planning and delivery of services in Newry Mourne and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards achieving its outcomes. Section 8 of the Local Government Act 2014, (as amended) requires the Council to take its Community Plan into account in LDP preparation. The LDP team has therefore formulated the Draft Policies in order to contribute towards the achievement of these outcomes.
- 4.1.25 The Community Plan sets 5 outcomes for the life conditions that it seeks to achieve for Newry Mourne and Down, among these are “All people in Newry, Mourne and Down benefit from a clean, quality and sustainable environment.” Among the indicators that will demonstrate how this outcome is achieved is “Level of Quality Environment,” one of the measures set out for this indicator is the recycling rate.

Cross Boundary Policy Context

- 4.1.26 The current situation in relation to LDP policies on Waste Management in the neighbouring Councils is set out below.

Table 1: Cross Boundary Policy Context

Neighbouring Council	Position
Ards and North Down Borough Council	Ards and North Down Borough Council published its Preferred Options Paper in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the preferred options, Key Issue 15 is "Facilitating Sustainable Waste Management" the preferred option being "Identify and safeguard appropriate lands to meet the anticipated needs of the Borough in relation to waste management facilities (including recycling and WWTWs). Complementary policy in relation to waste management proposals on un-zoned sites will be introduced."
Lisburn and Castlereagh City Borough Council	Lisburn and Castlereagh City Council published its adopted Local Development Plan in September 2023. Objective F of the Spatial Strategy is titled "A Connected Place" among the actions listed is "Support effective waste management through reuse, recycling and reduction of waste to limit landfill, minimising environmental impacts." Strategic Policy 1 – Sustainable Development emphasises that sustainable development recognises that there is a need to reduce emissions of greenhouse gas, the sustainable management of waste can help achieve this by reducing emissions from the transport of waste and from landfill. Strategic Policy 23 – Waste Management, seeks to facilitate the development of appropriate waste management facilities in the most appropriate locations in accordance with the proximity principle and having regard to the waste hierarchy, to employ the most appropriate technology while ensuring all appropriate environmental protections are in place and secure the restoration and aftercare of waste management sites. There are five Operational Policies, WM1 which relates to Waste Management Facilities, WM2 Treatment of Waste Water, WM3 Waste Disposal, WM4 Land Improvement and WM5 Development in the vicinity of Waste Management Facilities or WWTW's.

Armagh City, Banbridge and Craigavon Brough Council	Armagh City, Banbridge and Craigavon Borough Council published its Preferred Options Paper in March 2018. Key Issue ENV10 is "Facilitating Sustainable Waste Management," the preferred option is "An approach to waste management in line with existing criteria-based policy but tailored to meet local circumstances; and in addition identify suitable locations for waste management facilities were appropriate. "
Louth County Council	Louth County Council published its Development Plan in September 2021. Chapter 10 is titled "Infrastructure and Other Utilities." The overall aim is "Support County Louth's strategy for targeted population and strong economic growth in line with national and regional objectives through protection, improvement and extension of water services infrastructure, and flood alleviation services throughout the County, in conjunction with other statutory bodies. Paragraph 10.11.12 "Waste Management and Disposal" states "All future developments should seek to minimise waste through reduction, re-use and recycling. Waste management and disposal should be considered as part of the construction process and in the operation of the development when completed." The Plan also recognises the potential for waste material as a source of renewable energy. The Council is part of the Eastern Midlands Waste Management Plan, which sets out planning procedures for various types of waste disposal and sets a goal of recycling 60-70% of household waste by 2030. ⁴⁰
Monaghan County Council	Monaghan County Council published the Interim Version of its County Development Plan 2025-2031 on 26 May 2025. Chapter 8 includes a section on "Waste Management and the Circular Economy" the overall aim is to reduce and recycle as much as possible and the production of new waste is minimised. Two objectives and five draft policies are proposed which seek to minimise the creation of new waste and ensure that what is produced is recycled and reused as much as possible, while treatment and disposal occurs in a way which is as sustainable as possible

⁴⁰ [Eastern Midlands Region Waste Management Plan](#)

- 4.1.27 As part of the preparation of the Draft Plan Strategy, the LDP Team has held discussions with DfI and the LDP Teams of all the neighbouring Councils at which the different issues encountered by them have been discussed and the rationale behind the chosen policy approaches have been set out. These have been used by the LDP Team to inform its own policy recommendations on these issues.
- 4.1.28 The Council considers that its Draft Policies are consistent with Regional Policy and the adopted LDP strategies of adjoining authorities as they seek to minimise the production of new waste while encouraging the recycling of waste and that all treatment and disposal happens in a sustainable manner

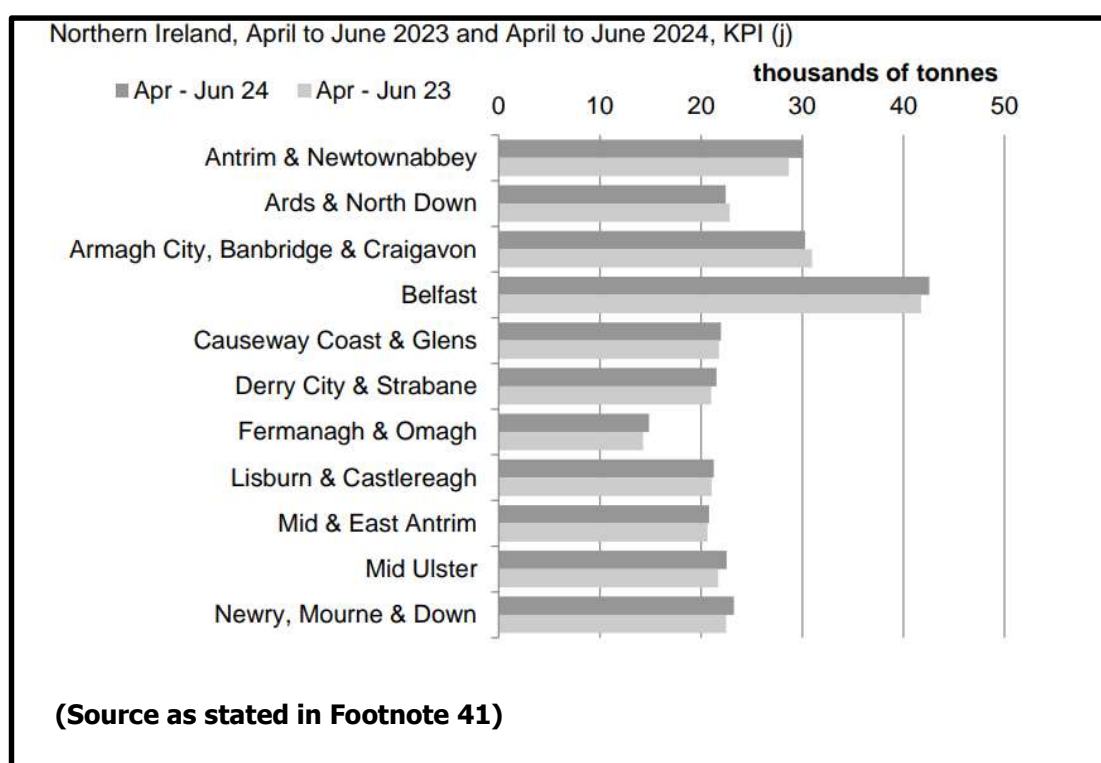
4.2 Preferred Options Paper

- 4.2.1 The Council published the Preferred Options Paper (POP) as the first stage in the preparation of the LDP on 29 May 2018. Paragraph 4.5 set out the Strategic Objectives for the LDP, one of the two economic objectives is "Supporting the Transportation Network and Other Infrastructure." under this objective the following goal is outlined;
- Accommodate investment in public utilities and waste management
- 4.2.2 As part of the process of preparing the POP a Preliminary Review of Operational Planning Policy was carried out which drew upon operational experience and changes in regional planning policy to identify issues to be addressed through the preparation of the LDP.
- 4.2.3 The POP identified 24 Key Issues, provided suggested options for addressing them and identified the Council's preferred option for each Key Issue. None of the Key Issues related to waste management, however one of the Priority Areas to support the implementation of the Community Plan set out in para 4.3 of the Vision and Strategic Objectives for the LDP under Environment and Spatial Development is; "Reduce the impact of waste."
- 4.2.4 None of the responses to the consultation referred to the issue of waste management.

4.3 District Profile – Waste Management

- 4.3.1 The collection and disposal of waste is a statutory function of Councils, the last landfill sites within the District, at Aughnagon and Drumnakelly ceased to be used for the purpose of household waste in April 2015 and May 2016 respectively. Currently 'Black Bin' waste within the district is collected by the council and transferred to private operators for sorting of material appropriate for 'Refuse Derived Fuel' and recovery of recyclable and biodegradable material.
- 4.3.2 The Waste and Contaminated Land (NI) Order 1997, requires all Councils to prepare a Waste Management Plan, this is currently overseen by Arc21. The current WMP proposes the uses of Mechanical Biological Treatment technologies to recover material for recycling, so the residual waste can then be used as a fuel for an Energy from Waste facility.
- 4.3.3 DAERA collects and publishes statistics on Local Authority Collected (LAC) waste on a quarterly basis. The most recently published bulletin, showed that there was an increase of 3.5% in the amount of waste arising in the District between April – June 2023 and the equivalent period in 2024 with a total of 19,331 tonnes arising.⁴¹

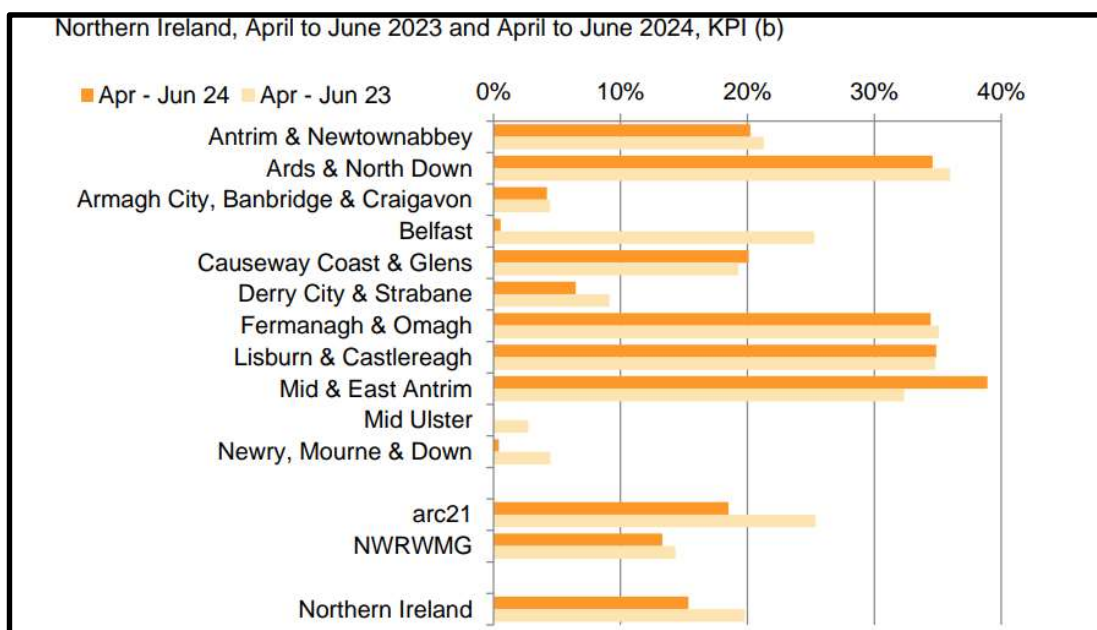
Figure 2: Waste arising per council 2023-24



⁴¹ [Northern Ireland Local Authority Collected Municipal Waste Management Statistics April to June 2024](#)

- 4.3.4 In the same period, a total of just 957 tonnes of waste arising in the District was sent to landfill, the second lowest figure of a local authority.

Figure 3: Household waste landfilled by Councils 2023-24



(Source Footnote 41)

- 4.3.5 In terms of recycling a total of 8,807 tonnes of waste arising was recycled while 9,376 tonnes arising was sent for energy recovery.
- 4.3.6 The Council currently operates a waste transfer station at the former Drumnakelly Landfill Site and 10 Household Recycling Centres in the following locations;
- Ballynahinch
 - Camlough
 - Castlewellan
 - Crossmaglen
 - Downpatrick
 - Hilltown
 - Kilkeel
 - Newry
 - Newtownhamilton
 - Warrenpoint
- 4.3.7 Commercial waste disposal is the responsibility of the waste generator, there are a number of private sector firms involved in the collection, transfer and processing of waste operational within the District. These are licensed by DAERA under the relevant legislation.

4.4 Consultee and Stakeholder Engagement

- 4.4.1 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, providers of public utilities 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.
- 4.4.2 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.
- 4.4.3 A Briefing Paper outlining the proposed text of the policies for inclusion in the Draft Plan Strategy was presented to the Council's Planning Committee on 20 October 2021. Following this briefing, members voted to agree the draft planning policies for inclusion in the Plan Strategy and authorised the LDP Team to amend the draft policies as necessary in response to consultee engagement.

4.5 Draft Plan Strategy Approach

- 4.5.1 The Draft Plan Strategy seeks to facilitate the development of waste management projects and reduce the overall level of non-reusable and non-recyclable waste produced within the District. It is in accordance with Regional Policy and also helps to implement the relevant sections of the Council's Community and Corporate Plans.
- 4.5.2 The waste management strategy and policies have also been drafted to reflect the following objective for the plan, as was set out in as were set out in Table 3 in the draft Plan Strategy.
- Economic; To accommodate investment in public utilities and waste infrastructure.
- 4.5.3 The Spatial Growth Strategy contains a Waste Management Strategy that includes Strategic Policy WSM1 – Waste Management, which seeks to support the development of sustainable waste management, recycling and disposal facilities in appropriate locations as part of the wider Council Strategy to reduce, reuse and recycle the District's waste.
- 4.5.4 There are five operational policies in the Draft Plan Strategy relating to Waste Management, these largely update and where necessary expand upon the existing policies set out in PPS11. Policy WM1 – Waste Management Development has general criteria that relate to all applications for waste management. In comparison to PPS18, a new criterion requiring that proposals do not sterilise mineral reserves has been introduced. As with the existing operational policy, WM1 requires applicants to provide all necessary information to enable the potential impacts of waste management proposals to be fully assessed, where necessary this will require an Environmental Impact Assessment. Planning conditions or Section 76 agreements will be used to impose such measures that are deemed necessary to mitigate the impacts of a facility, such as the types of waste to be processed, the methods of processing, hours of operation etc, as well as for the aftercare of a site after it has closed. Other policies in the waste management section, and elsewhere in the plan "signpost" to WM1 where necessary.
- 4.5.5 Policy WM2 – Waste Collection and Treatment Facilities, carries over the sequential test of suitable locations for such facilities from PPS11. The most suitable location is industrial or port areas, followed by active or disused quarries and waste management sites, facilities in the countryside should reuse existing buildings with new developments kept to a minimum. The Justification and Amplification text sets out criteria for assessing a full range of proposals from Regional Scale Facilities to neighbourhood composting schemes. The introduction to WM2 links it to WM1 so that proposals must satisfy all relevant criteria of both policies.

- 4.5.6 The three remaining policies, largely update the equivalents from PPS11, Policy WM3 – Waste Disposal, states that the development of landfill sites etc, will only be permitted where a need for the facility has been demonstrated by Waste Management strategies and plans at regional and Arc21 level. Policy WM4 – Land Improvement relates to the disposal of inert waste and finally Policy WM5 – Development in the Vicinity of Waste Management Facilities, seeks to prevent the operation of waste management facilities, including Waste Water Treatment Works, from being prejudiced by development that would impact people, transport or the environment, unless the impacts can be sufficiently mitigated.

4.6 Soundness

- 4.6.1 The LDP has been prepared to achieve the indicators of soundness as set out in the DfI Development Plan Practice Note: Soundness (Version 2, May 2017). The Draft Plan Strategy, in relation to the waste management strategy and subject policies and other relevant policies in this document is regarded as sound, as it is considered they have met the tests of soundness as summarised below:

Table 2: Soundness

Procedural Tests	
P2	The Council's waste management strategy and subject policies have been developed from and evolved from the POP, POP Consultation Report, Consultee and Councillor Engagement.
P3	The waste management strategy and subject policies have been subject to a Sustainability Appraisal.
Consistency Tests	
C1	The waste management strategy and subject policies have taken account of the Regional Development Strategy, in particular Strategic Guidance RG10, as set out in paragraphs 4.1.3- 4.1.6 of this Chapter.
C2	The waste management strategy and subject policies have taken account of the Council's Community Plan and the Corporate Plan, in particular the objectives seeking to boost the rate of recycling in order to improve the quality of the District's environment as per paragraphs 4.1.21-4.1.23 of this Chapter.
C3	The waste management strategy and subject policies have taken account of the provisions of the Strategic Planning Policy Statement as it relates to waste management, as per paragraphs 4.1.8 - 4.1.13 of this Chapter.
C4	The waste management strategy and subject policies have been developed by taking account of the existing development plans and Council strategies relating to waste management within Newry, Mourne and Down area as per paragraphs 4.1.24 – 4.1.25 of this chapter.
Coherence and the effectiveness tests	
CE1	The LDP has been developed alongside other Councils emerging and adopted LDP's and no conflict has been identified as per paragraphs 4.1.26 – 4.1.28 of this Chapter.
CE2	The waste management strategy and subject policies have been prepared on a sound evidence base, drawing on the baseline information set out in LDP Preparation Paper 9, which has been updated as required during the preparation of this Chapter.
CE3	Annual monitoring is not considered necessary as it is anticipated that the developers of large-scale waste management projects will make their requirements known through the preparation of the Local Policies Plan, or where necessary, the Development Management Process.
CE4	The waste management strategy and subject policies will be reviewed at Plan Review Stage.

4.7 Evolution of Policies

Table 3: Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy WM1 – PPS11. Provides guidance for the assessment of impacts from waste management facilities</p> <p>Policy WM2 – PPS11. Sequential Test for Waste Management Facility proposals</p> <p>Policy WM3 – PPS11 Proposals for waste management facilities</p> <p>Policy WM4 – PPS11 Disposal of inert waste by infilling</p> <p>Policy WM5 – PPS11 Development in vicinity of facilities</p> <p>Supplementary Planning Guidance DCAN10, applies for applications that need</p>	<p>RDS –RG10 “Managing our Waste Sustainably.” Waste Hierarchy</p> <p>SPPS -Para 6.310 “Promote waste management and recycling facilities in appropriate locations, minimisation of detrimental effects and appropriate restoration measures ”</p> <p>Regional Strategic Policy sets out sequential test for sites and Waste Hierarchy</p>	None	None	<p>Waste Management Strategy WSM1 Support the development of sustainable waste management recycling and disposal facilities in appropriate locations,</p> <p>Policy WM1 – Waste Management Development, replaces PPS11 policy, updated and expanded criteria</p> <p>Policy WM2 – Waste Collection and Treatment Facilities, Replaces PPS11 policy, sequential test for sites</p> <p>Policy WM3 – Waste Disposal, replaces PPS11 version, need for a facility must be established by WMS or WMP</p> <p>Policy WM4 – Land Improvement, Replaces</p>

Environmental Impact Assessment				<p>PPS11 version, disposal of inert waste</p> <p>Policy WM5 – Development in vicinity of Waste Management Facilities, prevents inappropriate developments near facilities.</p> <p>New Supplementary Planning Guidance</p>
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Chapter 5: Flood Risk and Drainage

Contents

5.0 Introduction to Flood Risk and Drainage	1
5.1 Policy Context	2
5.2 Preferred Options Paper	9
5.3 District Profile - Flood Risk and Drainage	10
5.4 Consultee and Councillor Engagement	11
5.5 Draft Plan Strategy Approach	22
5.6 Soundness	24
5.7 Evolution of Policies	25

Tables

Table 1: Cross Boundary Policy Context	6
Table 2: Soundness	24
Table 3: Evolution of Policies	25

Figures

Figure 1: River Basin Districts	11
Figure 2: DfI Maintained watercourses in Newry, Mourne and Down	12
Figure 3: Possible SuDS layout	14
Figure 4: Extract from Northern Ireland 2nd Cyle Flood Risk Management Plan 2021-2027	16
Figure 5: Coastal Flooding in Warrenpoint in Q200 event	17
Figure 6: Modelled watercourses in Newcastle	19
Figure 7: Climate change floodmap Downpatrick	20

5.0 Introduction to Flood Risk and Drainage

- 5.0.1 Many settlements were originally established at crossing points over rivers and their subsequent development has been influenced by their relationship with them. Recognition of this relationship has been heightened in recent years by a number of severe flooding events, particularly those which affected Downpatrick and Newry in October 2023. One of the predicted impacts of climate change will be an increase in the frequency and severity of such events.
- 5.0.2 Flooding is not exclusively caused by rivers (fluvial flooding) but it can also occur in coastal areas during storms or at high tides, from excessive surface run off during heavy rainfall (alluvial flooding) and from the failure of a reservoir. Planning policy has developed to recognise the risks associated with flooding and seeks to mitigate them by directing new developments away from areas known to be at risk or ensuring that adequate flood protection measures are implemented and safeguarded from inappropriate developments.
- 5.0.3 The management of flood risk isn't exclusively about the provision of physical defence works, but often involves not developing areas known to be at a significant risk of flooding and instead leaving them in a natural state. Such areas can also have uses for recreation and serve as biodiversity "hotspots" helping to achieve other aims of the LDP.

5.1 Policy Context

Regional Policy NI Executive Draft Programme for Government 2024-2027 “Doing What Matters”

- 5.1.1 The Programme for Government (PfG) was agreed by the Northern Ireland Executive on 27 February 2025.
- 5.1.2 The PfG sets out a number of missions under which a number of themes and priority areas are identified, under the mission “Building a Better Tomorrow” the recent incidents of more frequent and severe flooding are referred to as part of the impact of climate change. It is proposed to draw up a Northern Ireland Climate Action Plan to tackle climate change and the detrimental societal and economic impacts it will cause as well as developing a new flood forecasting system.

Regional Development Strategy 2035

- 5.1.3 The RDS provides an overarching strategic planning framework to facilitate and guide the public and private sectors and ultimately shall influence Council decisions and investments.
- 5.1.4 The RDS sets out 8 aims, the most relevant of which for flood risk and drainage is;
- Take actions to reduce our carbon footprint and facilitate adaption to climate change;
- 5.1.5 The RDS also sets out Regional Guidance to be used in the preparation of LDP’s and the determination of planning applications, the most relevant for Flood Risk and Drainage are:
- RG8 – Manage Housing Growth to achieve sustainable patterns of residential development. The Guidance sets out a Housing Evaluation Framework that is to be used to assist judgements on the allocation of housing growth. This Framework contains 6 tests to be used in making such judgements, one of these is the Environmental Capacity Test, the supporting text for which states; “An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.”
 - RG9 – Reduce our Carbon Footprint and facilitate mitigation and adaptation to climate change whilst improving air quality. Among the adverse effects of climate change listed in the Guidance is “the effects on species and habitats and on health as a result of warmer temperatures, storms, floods and coastal erosion.”

- RG12 – Promote a more sustainable approach to the provision of water and sewerage services and flood risk management. Under the guidance three measures are set out, the most relevant to Flood Risk and Drainage are:- Encourage sustainable surface water management. Greater use of Sustainable Drainage Systems (SuDS) should be encouraged, particularly as part of significant development proposals. SuDS provide a water quality benefit and if designed appropriately can help control flows into rivers and drains thereby reduce the risk of flooding. All new urban storm water drainage systems should incorporate measures to manage the flow of waters which exceed design standards (exceedance flows) in order to help protect vulnerable areas.

Sustainable Water – A Long-Term Water Strategy for Northern Ireland (2015-2040)

- 5.1.6 The Strategy was published by the Department for Infrastructure (DfI) in March 2016, setting out its plans for the management of the water industry in Northern Ireland. It highlighted that planning policies must play a key role in promoting sustainable water and sewerage services infrastructure, and that Local Development Plans should require the incorporation of sustainable drainage systems as well as making provision for waste-water treatment facilities.
- 5.1.7 The strategy identifies four key sections, which in turn set out a number of aims, policies and actions to achieve sustainable water. Where necessary these will be incorporated into LDP's;
- Drinking Water Supply and Demand;
 - Flood Risk Management and Drainage;
 - Environmental Protection and Improvement, and;
 - Water and Sewage Services.

Draft Marine Plan for Northern Ireland⁴²

- 5.1.8 The draft Marine Plan for Northern Ireland was published in April 2018, it is intended to inform and guide the regulation, management, use and protection of our marine area, both inshore region and offshore. When the final version is adopted any proposals in relation to coastal defences will need to comply with its provision.

Strategic Planning Policy Statement (SPPS)

- 5.1.9 The SPPS was adopted in September 2015, it provides a framework for the replacement of the retained Planning Policy Statements by the Local Development Plans of Councils. In Paragraph 6.103 it is stated that the aim of the SPPS in relation to flood risk is "to prevent future development

⁴² [Draft Marine Plan for Northern Ireland](#)

that may be at risk from flooding or that may increase the risk of flooding elsewhere.”

- 5.1.10 The SPPS’s regional strategic objectives in relation to flood risk development as set out in Paragraph 6.104 are to:
- prevent inappropriate new development in areas known to be at risk of flooding, or that may increase the flood risk elsewhere;
 - ensure that the most up to date information on flood risk is taken into account when determining planning applications and zoning / designating land for development in Local Development Plans (LDPs);
 - adopt a precautionary approach to the identification of land for development through the LDP process and the determination of development proposals, in those areas susceptible to flooding where there is a lack of precise information on present day flood risk or future uncertainties associated with flood estimation, climate change predictions and scientific evidence;
 - manage development in ways that are appropriate to the four main sources of flood risk in Northern Ireland, i.e. fluvial, coastal, surface water and water impoundment (reservoir) breach or failure;
 - seek to protect development that is permitted within flood risk areas by ensuring that adequate and appropriate measures are employed to mitigate and manage the flood risks;
 - promote sustainable development through the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation and an important environmental and social resource;
 - promote sustainable development through encouraging the use of sustainable drainage for new development and redevelopment / regeneration schemes;
 - promote public awareness of flood risk and the flood risk information that is available and of relevance to undertaking development; and
 - promote an integrated and sustainable approach to the management of development and flood risk which contributes to:
 - the safety and well-being of everyone,
 - the prudent and efficient use of economic resources,
 - the conservation and enhancement of biodiversity, and
 - the conservation of archaeology and the built heritage.
- 5.1.11 Regional Strategic Policy in relation to Flood Risk and Drainage is set out in Paragraphs 6.105 – 6.125, these introduce a number of revisions to the existing operational policy. The implications of these will be referred to in Chapter 5.5.

Revised Planning Policy Statement 15 Planning and Flood Risk⁴³

- 5.1.12 Current operational planning policy in relation to flood risk and drainage is set out in the revised version of PPS15 which was adopted in September 2014. It contains 5 policies that adopt a precautionary approach to development within flood plains or areas known to be at risk from other forms of flooding, unless an applicant can demonstrate that their proposal meets the exceptions set out by means of a Flood Risk Assessment.

Supplementary Planning Guidance

- 5.1.13 A number of documents providing further technical guidance to Councils on the issues relating to flood risk and drainage have been issued;
- Technical Flood Risk Guidance in relation to Allowances for Climate Change in Northern Ireland ⁴⁴
 - The Practical Application of Strategic Planning Policy in Relation to Development in Proximity to Reservoirs⁴⁵
 - Managing Stormwater – A Strategy Promoting the use of Sustainable Drainage Systems within Northern Ireland⁴⁶

Local Policy Context

Existing Area Plans

- 5.1.14 The District is currently covered by two Area Plans, both of which are now beyond their end date;
- Ards and Down Area Plan 2015 (Adopted March 2009)
 - Banbridge, Newry and Mourne Area Plan 2015 (Adopted October 2013)
- 5.1.15 Neither plan contains policies specific to flood risk and drainage, instead stating that Rivers Agency would be consulted on planning applications on sites affected by flooding. Both plans identified a number of locations within their respective areas that were known to be at risk of flooding.
- 5.1.16 The current situation in relation to LDP policies on Flood Risk and Drainage in the neighbouring Councils is set out below.

Newry Mourne and Down Council Corporate Plan 2024-2027

- 5.1.17 The Councils mission is to “To deliver sustainable services and empower our communities through transparent governance and collaboration”. The Corporate Plan incorporates the outcomes set in the Community Plan into

⁴³ [DfI - Revised Planning Policy Statement 15 'Planning and Flood Risk'](#)

⁴⁴ [DfI - Technical Flood Risk Guidance in relation to Allowances for Climate Change in Northern Ireland](#)

⁴⁵ [DfI - The Practical Application of Strategic Planning Policy in Relation to Development in Proximity to Reservoirs](#)

⁴⁶ [DfI - A Strategy Promoting the use of Sustainable Drainage Systems within Northern Ireland](#)

its vision for the District and sets 8 objectives for the Council in achieving these. Under the objective “Protect and enhance our environment to ensure a sustainable future”, the preparation of the Local Climate Change Adaptation Plan is listed as a key action.

Newry Mourne and Down District Council – Community Plan 2030 “Living Well Together”

- 5.1.18 The Community Plan is the overarching strategic plan for integrated planning and delivery of services in Newry Mourne and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards achieving its outcomes. Section 8 of the Local Government Act 2014, (as amended) requires the Council to take its Community Plan into account in LDP preparation. The LDP team has therefore formulated the Draft Policies in order to contribute towards the achievement of these outcomes.
- 5.1.19 The Community Plan sets 5 outcomes for the life conditions that it seeks to achieve for Newry Mourne and Down, among these are “All people in Newry, Mourne and Down benefit from a clean, quality and sustainable environment.” One of the indicators that will demonstrate how this outcome is achieved is “Level of Quality Environment,” and finally one of the measures set out for this indicator is the number of properties at risk of flooding.

Cross Boundary Policy Context

- 5.1.20 In considering the local policy context, it is important to take account of the three neighbouring councils in Northern Ireland and the two in the Republic of Ireland. The table below offers a short summary of each Council’s position with regards to transportation development.

Table 1: Cross Boundary Policy Context

Neighbouring Council	Position
Ards and North Down Borough Council	<p>Ards and North Down Borough Council published its Preferred Options Paper in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the preferred options, Key Issue 19 is “Developing within areas of Flood Risk” the preferred option being “Adopt a precautionary approach to development – only permit certain suitable types of development in flood prone areas, in line with the SPPS and with appropriate mitigation.”</p> <p>Key Issue 20 “Sustainable Drainage Systems (SuDS)” the preferred option is “Bring forward policy to require the use of Sustainable Drainage Systems (SuDS) in new developments”</p>

<p>Lisburn and Castlereagh City Borough Council</p>	<p>Lisburn and Castlereagh City Council published its adopted Local Development Plan in September 2023. Objective F of the Spatial Strategy is titled "A Connected Place" among the actions listed is "Prevent inappropriate development in areas at risk of flooding or that increase flood risk elsewhere, whilst managing flood risk and providing mitigation where necessary." Strategic Policy 1 – Sustainable Development emphasises that sustainable development recognises that there is a need to mitigate and adapt to climate change and develop sustainable infrastructure, one of the ways this will be carried out is by avoiding development in areas at risk of flooding. Strategic Policy 24 – Flooding, seeks to reduce the impacts of flooding by avoiding developments in areas of known risk, to seek greater use of SuDS and a precautionary approach in areas where the precise risk of flooding is unproven. There are five Operational Policies, FLD1 Development in Fluvial (River) Flood Plains, FLD2 Protection of Flood Defence and Drainage Infrastructure, FLD3 Development and Pluvial (Surface Water) Flood Risk outside Flood Plains, FLD4 Artificial Modification of Watercourses and FLD5 Development in Proximity to Reservoirs.</p>
<p>Armagh City, Banbridge and Craigavon Brough Council</p>	<p>Armagh City, Banbridge and Craigavon Borough Council published its Preferred Options Paper in March 2018. Key Issue ENV7 is "Developing within areas of Flood Risk (Flood Plains)," the preferred option is "Adopt a precautionary approach in line with existing policy and regional direction by having a presumption against development in flood plains other than in exceptional circumstances. The precautionary principle will be applied to areas which are currently subject to food risk or in the future. "</p> <p>Key Issue ENV8 is "Encouraging Sustainable Drainage Systems (SuDS), the preferred option is "Bring forward policy to encourage the use of Sustainable Drainage Systems (SuDS) in new development where appropriate."</p>
<p>Louth County Council</p>	<p>Louth County Council published its Development Plan in September 2021. Chapter 10 is titled "Infrastructure and Other Utilities." Policy IU 21 relates to drainage "To seek to avoid the discharge of additional surface water to</p>

	combined sewers and promote Sustainable Urban Drainage Systems (SuDS) and solutions to maximise the capacity of towns with combined drainage systems.” Section 10.3 of the Plan relates to flood risk management, it sets out 10 Policy Objectives, there are three types of flood zones identified, A, B and C, in zones A and B where the risk is greatest, development will only be permitted where it can be demonstrated that the development and its infrastructure will not be affected by significant risks of flooding or cause flooding elsewhere. Chapter 12 relates to Climate Change, the increased risk of flooding is identified as a major hazard that has the potential to create significant resource implications for the Council, through the provision of new flood defences or having to rehouse families displaced by flooding.
Monaghan County Council	Monaghan County Council published the Interim Version of its County Development Plan 2025-2031 on 26 May 2025. It contains a Strategic Flood Risk Assessment to identify areas most at risk. Chapter 8 includes a section on Flood Risk Management, which sets out five objectives and four operational policies, the overall aim is to avoid developments in areas known to be at the highest risk, while upgrading flood defences to adapt to climate change. The Plan will also require the use of SuDS in new developments and its retrofitting into existing areas.

- 5.1.20 As part of the preparation of the Draft Plan Strategy, the LDP Team has held discussions with DfI and the LDP Teams of all the neighbouring Councils at which the different issues encountered by them have been discussed and the rationale behind the chosen policy approaches have been set out. These have been used by the LDP Team to inform its own policy recommendations on these issues.
- 5.1.21 The Council considers that it’s Draft Policies are consistent with Regional Policy and the adopted LDP strategies of adjoining authorities as they seek to prevent developments in areas known to be at risk of flooding, unless the applicant can demonstrate that the proposal meets a listed exception in the policy, or that the risks to the site or other locations can be adequately mitigated. The Draft Policies also seek to incorporate SuDS and other techniques in new developments.

5.2 Preferred Options Paper

- 5.2.1 The Council published the Preferred Options Paper (POP) as the first stage in the preparation of the LDP on 29 May 2018. Paragraph 4.2 set out the Community Plan's Outcomes, Priority Areas and Activities, listed as a Priority Area under Environmental and Spatial Development is, "Reduce impact of and mitigate against flooding."
- 5.2.2 Under Activities, the following are listed;
- Ensure flood mitigation and prevention is incorporated within the LDP including promoting 'soft' engineering methods
 - Investigate and identify sustainable drainage opportunities
 - Promote and support community resilience measures within identified flood risk areas
- 5.2.3 The Strategic Objectives for the LDP are set out in Paragraph 4.5, one of the themes listed under "Environmental" is "Protecting and Enhancing the Environment," under this is listed the following objective, "To reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding or coastal erosion."
- 5.2.4 As part of the process of preparing the POP a Preliminary Review of Operational Planning Policy was carried out which drew upon operational experience and changes in regional planning policy to identify issues to be addressed through the preparation of the LDP.
- 5.2.5 The POP identified 24 Key Issues, provided suggested options for addressing them and identified the Council's preferred option for each Key Issue. Key Issue 24 related to Flood Risk Management, the preferred option listed was "Precautionary approach toward development in flood prone areas. In addition, the Council would seek to address the issue of surface water flooding with SuDS being required on zoned sites through the use of key site requirements or alternatively incorporated into a new policy covering SuDS for all new development."
- 5.2.6 None of the responses to the consultation referred to the issue of flood risk.

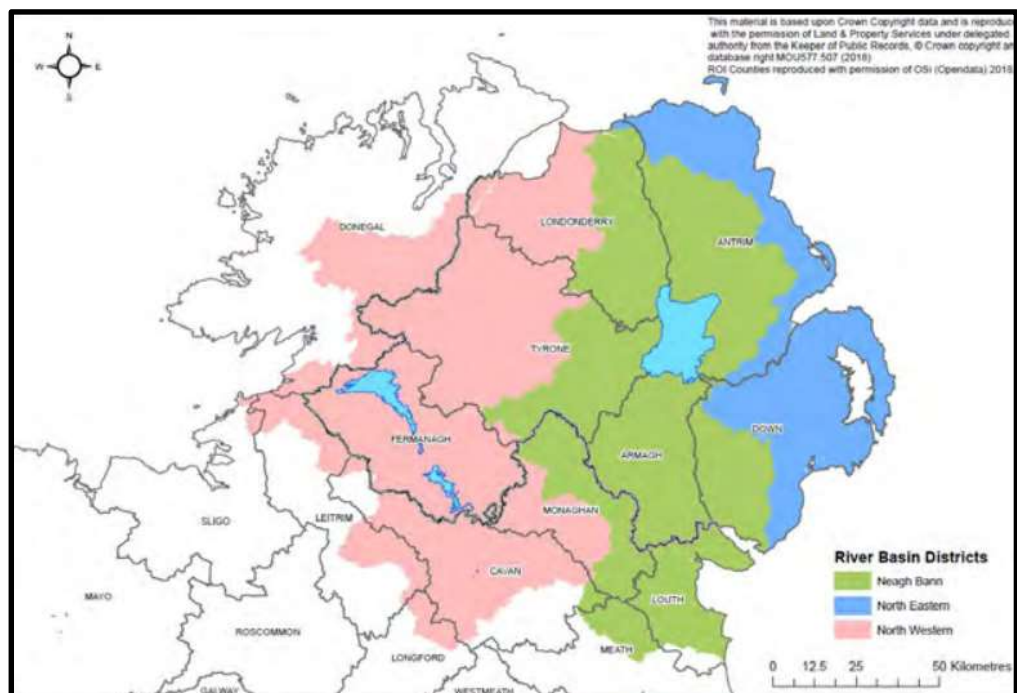
5.3 District Profile - Flood Risk and Drainage

- 5.3.1 Flooding is a natural process that cannot be entirely prevented. It is however important that flood risk is sustainably managed to facilitate social, economic and environmental development.
- 5.3.2 Flooding is also one of the effects of climate change that is expected to have the most immediate and costly impacts because of the increased incidence of extreme weather events resulting in more frequent incidents of coastal, fluvial and pluvial flooding events.
- 5.3.3 This chapter provides an overview of the potential impacts to the District from the four main types of flooding, accounting for climate change, and provides an overview of the public resources available to help the public identify the potential risks.

Rivers (Fluvial Flooding)

- 5.3.4 The District lies within both the Neagh-Bann and the North Eastern River Basin Districts are identified by the NI Flood Risk Management Plan

Figure 1: River Basin Districts

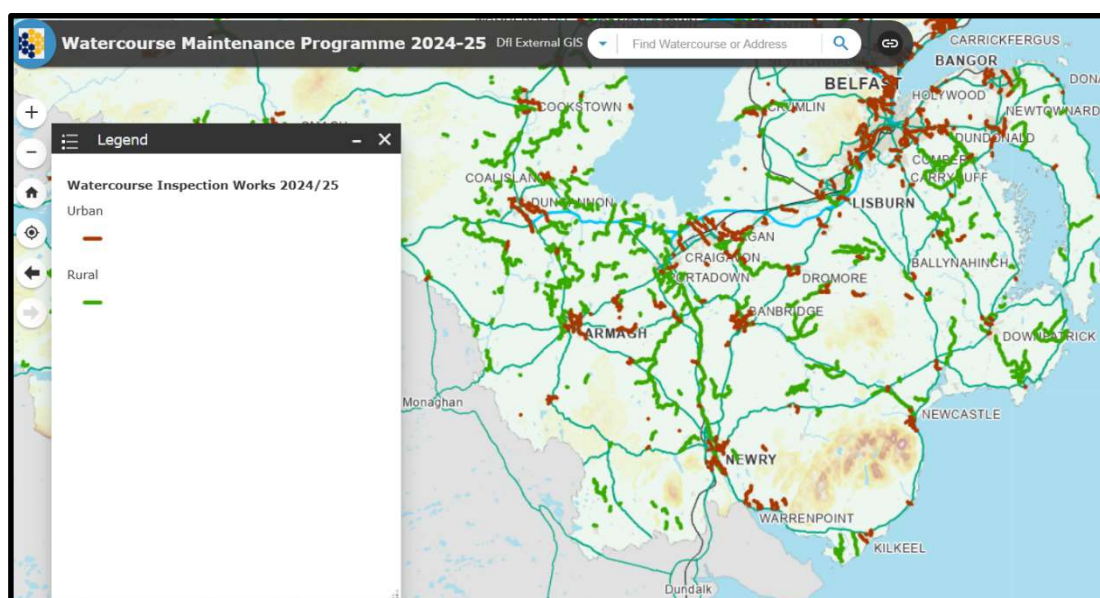


(Source NI Flood Risk Management Plan)

- 5.3.5 The development and maintenance of flood defences and the management of rivers and watercourses in general throughout Northern Ireland is the responsible of DfI Rivers (formerly Rivers Agency).

- 5.3.6 There are a number of significant rivers and watercourses in the District, some of which originate or discharge in other Council areas. Most notably the River Bann originates in the Mourne near Hilltown before flowing towards Lough Neagh, most of the rivers that are contained within the District such as the Clanrye/Newry, Kilkeel and Shimna Rivers are short in length, however as many of them originate in the Mourne and other upland areas, they are more prone to flooding due to the rapid inflow of runoff water due to the topography of their catchment areas.
- 5.3.7 The Newry Canal is another designated watercourse that has a significant role in flood risk management and drainage within Newry and the surrounding areas.
- 5.3.8 Details of all watercourses that are to be maintained by DfI Rivers during 2024-25 are available on the Agency's website, the below map shows those within the District⁴⁷

Figure 2: DfI Maintained watercourses in Newry, Mourne and Down



(Source DfI Rivers website)

- 5.3.9 DfI Rivers has a rolling programme of maintenance of both watercourses and flood defences as well as identifying and implementing Flood Alleviation Schemes. Currently the Shimna River FAS is in the process of being constructed,⁴⁸
- 5.3.10 The Newry Flood Alleviation Scheme has been split into a number of phases, notice of the Newry Stage 1 FAS was given in October 2019 and is now complete.⁴⁹ DfI – Rivers is currently progressing a study to review the flood risk in Newry and assess the viability of further flood alleviation

⁴⁷ [DfI Rivers - Web Map Viewer](#)

⁴⁸ [DfI - Shimna River Flood Alleviation Scheme](#)

⁴⁹ [DfI - Newry Stage FAS Stage 1 Notice of Works](#)

measures to reduce this risk. A preferred option for Phase 2 intended to reduce fluvial flood risk has been identified and Rivers Directorate have commissioned consultants to develop an outline business case to determine economic viability before progressing to the detailed design phase. Further phases will consider the need for upstream storage and potential measures to reduce tidal flood risk in the area. The project team are actively progressing an opportunity to expedite delivery of a section of the Phase 2 flood alleviation scheme in the vicinity of Newry Town Hall through the NMDDC Theatre Conference Project.

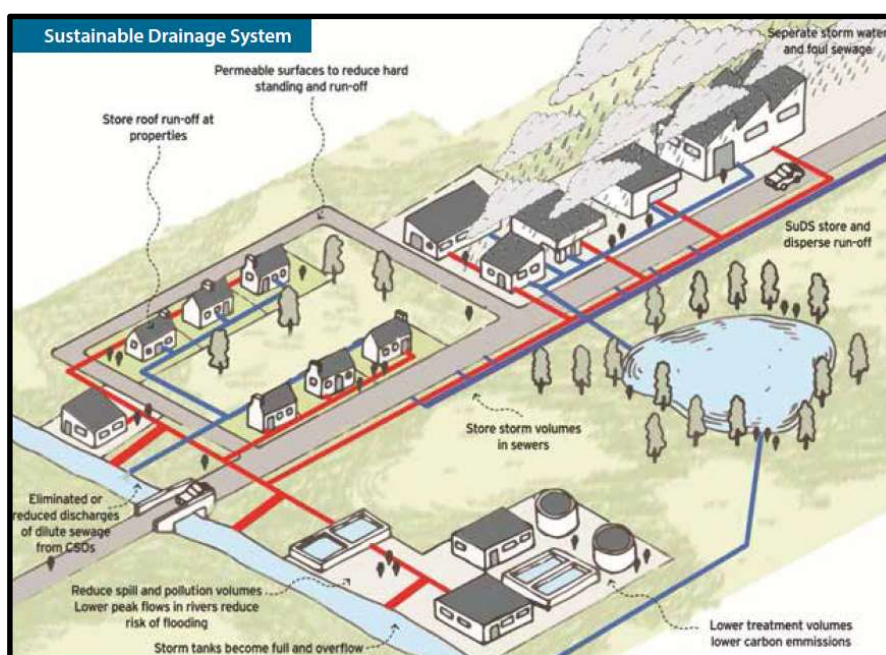
Coastal Flooding

- 5.3.10 The District has a significant coastline of approximately 160 kilometres in length, which stretches from the southern parts of Strangford Lough, along the Irish Sea before reaching Carlingford Lough. As referred to above several coastal locations have experienced significant flooding events due to storm surge or high tides.

Surface Water (Pluvial Flooding) and Sustainable Drainage Systems (SuDS)

- 5.3.11 Pluvial flooding has become an increasingly important issue in urban areas in recent times often due to the tendency to use impermeable materials such as concrete and tarmac in developments, in contrast to natural ground which can absorb significant amounts of surface water and mitigate the level of flooding. Development works can also cause pluvial flooding to occur in an area by changing ground levels creating areas where water that was previously able to flow into a watercourse instead becomes trapped or its flow is diverted into another developed area.
- 5.3.12 Pluvial flooding can also occur naturally when surface water runs into a hollow in the landscape and inundates it. As this is a natural process such pondage areas should be avoided by development as they play an important part in natural flood management.
- 5.3.13 The increased occurrence and severity of pluvial flooding events has resulted in the Water and Sewerage Act 2016 requiring the incorporation of Sustainable Drainage Systems (SuDS) in new developments. SuDS incorporates a range of measures intended to efficiently and sustainably drain surface water into watercourses while minimising pollution and the impact on those watercourses. SuDS seeks to replicate the natural drainage in a area as closely as possible and therefore it often includes measures to delay and reduce surface run-off such as permeable surfaces
- 5.3.14 A typical SuDS scheme is shown below, there are several other measures and strategies that can be incorporated into development schemes. It will be for developers and their agents to devise the strategy that is most suitable for the circumstances of the area in question.

Figure 3: Possible SuDS layout



(Source: DRD Sustainable Water)

Reservoirs

- 5.3.15 The Reservoirs Act (Northern Ireland) 2015 aims to ensure that the existing reservoirs in Northern Ireland are managed and operated to minimise any risk of flooding due to an uncontrolled release of water resulting from dam failure and therefore protecting people, the environment, cultural heritage and economic activity. It will impose management and maintenance requirements on owners and managers of reservoirs with a volume in excess of 10,000 cubic metres. To facilitate the management of such reservoirs, DfI Rivers has prepared reservoir inundation maps. Where development is proposed in close proximity to a reservoir, the developer will be required to submit a detailed flood risk assessment to show how the development will not be at risk of flooding from the nearby reservoir. Consequently, when preparing the LDP the Council may not wish to allocate land for development close to existing reservoirs. To do so would be to require the developer to carry out a flood risk assessment, thus complicating the planning application process.
- 5.3.16 There are currently 18 controlled reservoirs in the District, listed on DfI's Reservoir Flood Map.⁵⁰ The largest of these are impounding reservoirs operated by Northern Ireland Water for the supply of drinking water, as a result they are maintained to a high standard and meet the requirements of current planning policy. The controlled reservoirs are;
- Ballylough Lake
 - Ballywillwill Pond

⁵⁰ [DfI - Reservoir Flood Maps](#)

- Ben Croom Reservoir
- Bessbrook Pond
- Camlough Lake
- Donaghguy Reservoir
- Finnebrogue Lough
- Fofanny Dam
- Lough Island Reavy
- Lough Money
- Macauley's Lake
- Mill Pond Donaghguy
- Mill Pond Killyleagh
- Seaforde House Lower Lake
- Shannagh Lough
- Silent Valley
- Spelga Dam
- Tannaghmore Reservoir

Flood Maps NI⁵¹

- 5.3.17 DfI Rivers maintains an online map viewer that details the current areas at risk from coastal, fluvial and pluvial flooding both currently and in the future under current models of climate change. The viewer is used by developers and their agents to anticipate likely flood risks to sites and by planning staff involved in assessing Development Management applications to determine if consultation with DfI Rivers is necessary.

Northern Ireland 2nd Cycle Flood Risk Management Plan 2021-2027⁵²

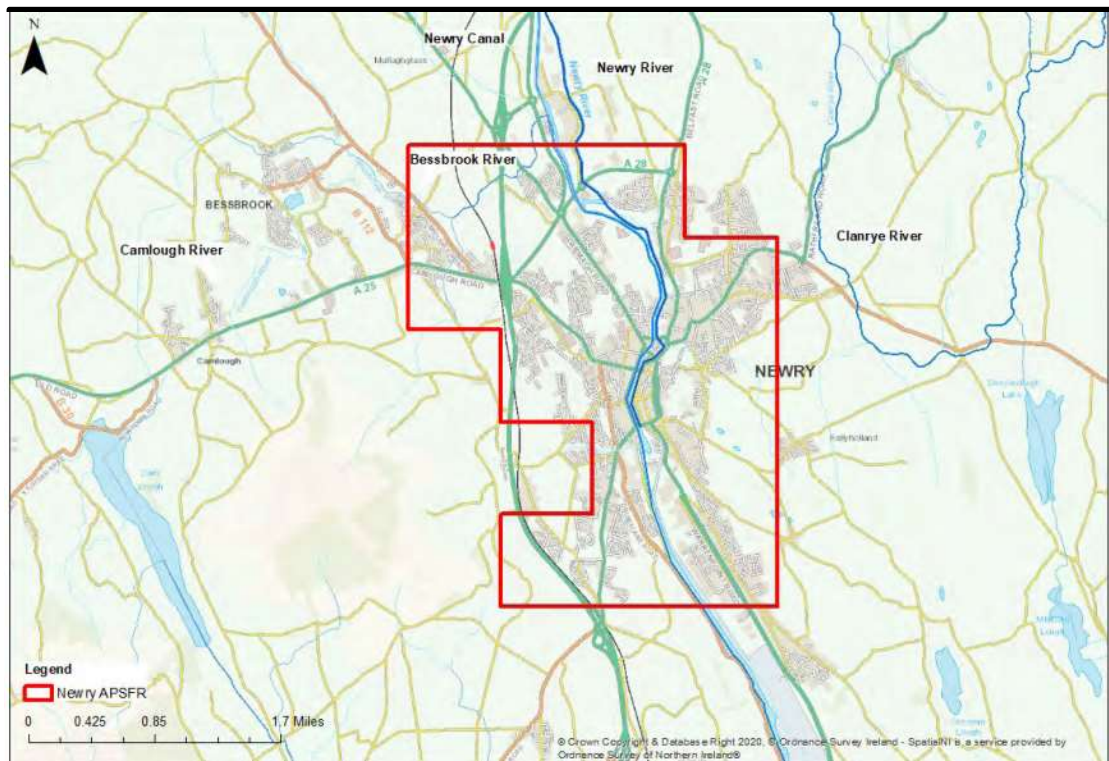
- 5.3.18 The flood risk management plan is a requirement of the Water Environment (Floods Directive) Regulations (Northern Ireland) 2009. The second cycle Flood Risk Management Plan 2021-27 highlights the flood hazards and risks in the Areas of Potential Significant Flood Risk in NI from rivers, the sea and surface water. The plan identifies the Objectives and Measures that will be undertaken to manage the risk of flooding and sets out how the relevant authorities will work together with communities to manage flood risks. The Plan continues to focus on the '3 Ps' in relation to managing aspects of flood risk:
- Prevention
 - Protection
 - Preparedness
- 5.3.19 The Plan identifies Newry as being an Area of Potential Significant Risk of Flooding (APSRF), it refers to flooding events that occurred in 2011, 2014, 2015 and 2016. Newry is subject to fluvial flooding from a number of

⁵¹ [DfI - Flood Maps NI](#)

⁵² [DfI - NI 2nd Cycle Flood Risk Management Plan 2021-2027](#)

sources. The Newry River/Clanrye River passes through the city and is tidal in part. When high flows in the river coincide with high tides low lying areas of the city, especially the centre, are vulnerable to flooding. Within the city centre DfI Rivers modelling indicates that in a 5% AEP (1 in 20 year) event the Downshire Road and Sandy Street are likely to be the first areas impacted in the event of the Newry River breaching its containment walls. Bridge Street has been subject to flooding from the Glen River and Dromalane Stream on a number of occasions, such as in 2014 and this has impacted on both residential and commercial properties in the area. DfI Rivers have also identified Bridge Street as the main area at surface water flood risk. DfI Rivers flood data indicates that Newry is at risk from coastal flooding, particularly the Old Warrenpoint Road at the entrance to Greenbank Industrial Estate.

Figure 4: Extract from Northern Ireland 2nd Cyle Flood Risk Management Plan 2021-2027



(Source: Extract from Northern Ireland 2nd Cyle Flood Risk Management Plan 2021-2027)

Northern Ireland 1st Cycle Flood Risk Management Plans 2015-2021⁵³

- 5.3.20 Warrenpoint is impacted by fluvial flooding from the Moygannon River, Clonallan Stream and Milltown Stream. In a high frequency (10% AEP, 1 in 10 year) event floodwater is predicted to spill from the Milltown Stream into the Milltown Industrial Estate and Milltown Street areas. In a 1% AEP (1 in 100 year) event floodwater from the Clonallan Stream is predicted to pond to depths of 300mm in low lying areas downstream in the Sea View Road area and upstream in the Forth Road area.
- 5.3.21 The DfI Rivers coastal hazard map indicates that Warrenpoint is at risk from coastal flooding. Modelling indicates that in a high frequency (10% AEP, 1 in 10 year) flood event flood water is likely to inundate the Harbour Industrial Estate, Charlotte Street and Newry Street. At the most extreme, (0.5% AEP Q200) event, parts of Meeting Street and Clermont Gardens are also inundated.

Figure 5: Coastal Flooding in Warrenpoint in Q200 event



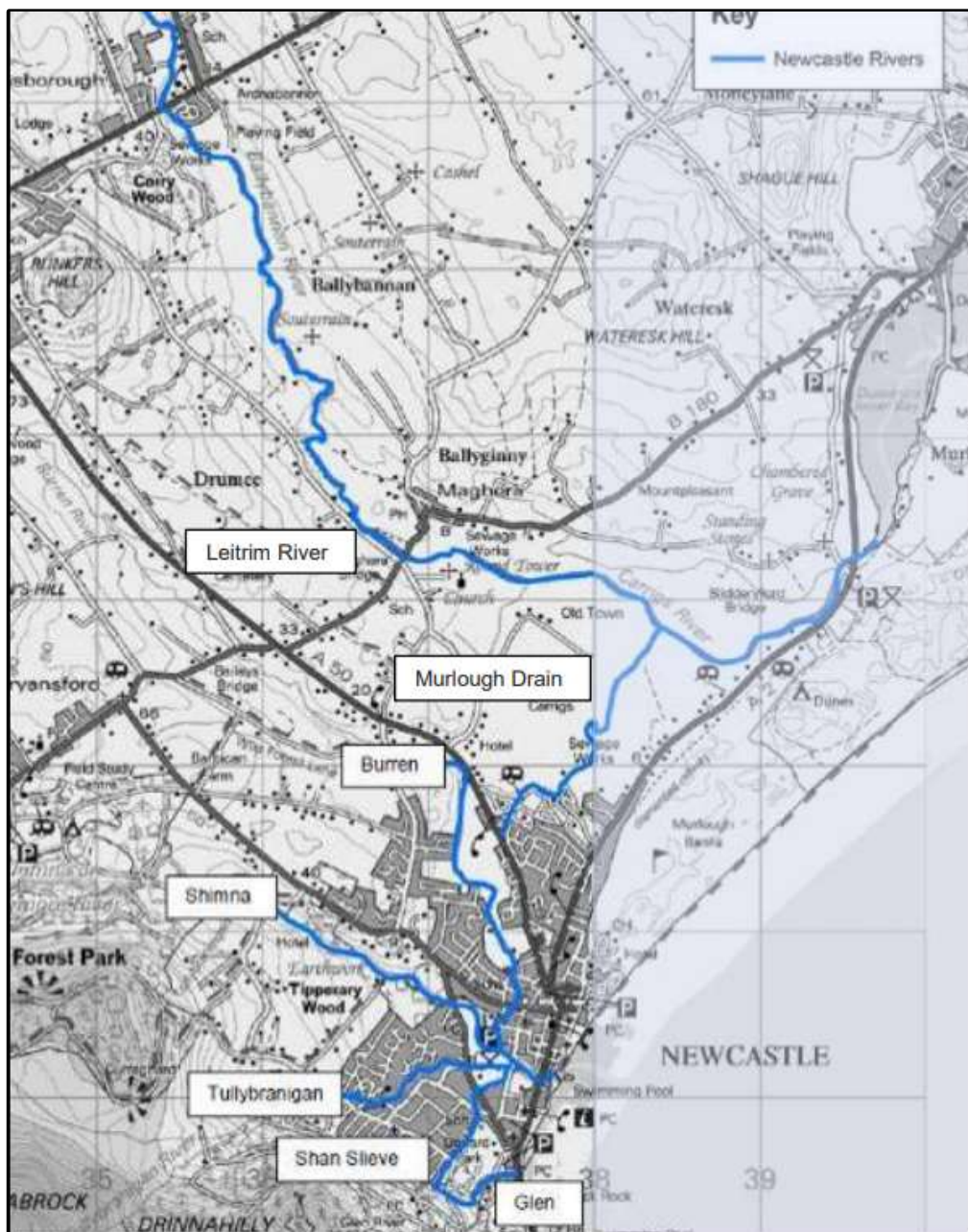
(Source as footnote 53)

- 5.3.22 The Department for Infrastructure, Rivers Directorate has commissioned a feasibility study to identify and assess a range of engineering solutions and confirm the economic and technical viability of a preferred option that will reduce the impact of any potential fluvial and tidal flooding on the properties at risk in Warrenpoint.

⁵³ [DfI - NI 1st Cycle Flood Risk Management Plan 2015-2021](#)

- 5.3.23 Historically Newcastle has been susceptible to flooding from both the Shimna and Burren Rivers. DfI Rivers undertook the Burren flood alleviation scheme in 2007 to address flooding from the Burren River, this currently prevents overtopping in a 1% AEP (1 in 100 year) flood event⁵⁴. More recent flood events have however been associated with the Shimna River. Modelling indicates that in a 10% AEP (1 in 10 year) event floodwater overflows the banks of the Shimna River and impacts on properties in and around Bryansford Ave, Beechfield Park, Shimna Road and Shimna Vale.

Figure 6: Modelled watercourses in Newcastle

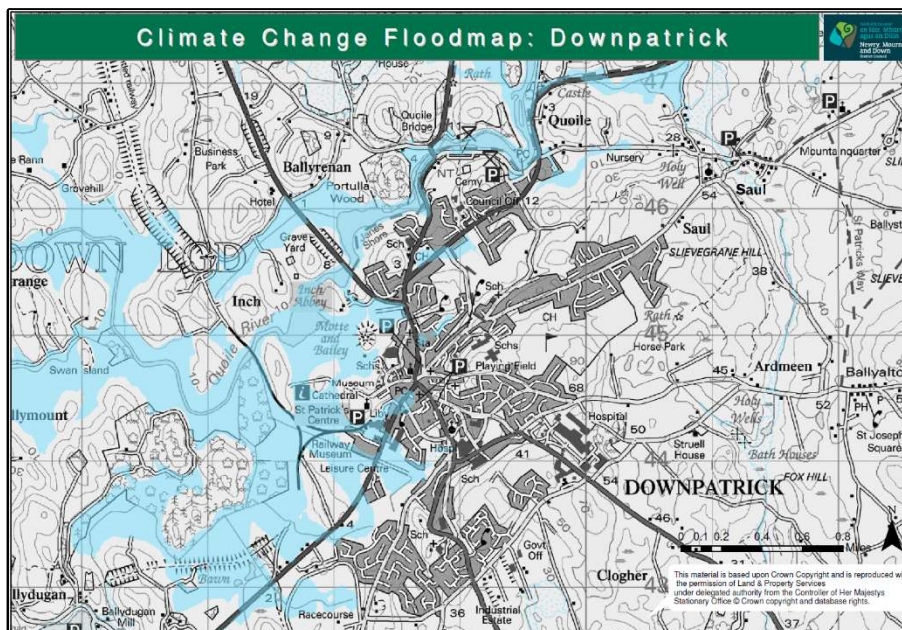


(Source as per footnote 55)

⁵⁴ [DfI - North Eastern Flood Risk Management Plan](#)

- 5.3.23 Finally within Downpatrick DFI Rivers modelling indicates that in the case of a high frequency (10% AEP, 1 in 10 year) flood event, floodwater will spill from the culverted watercourses within the town and cause shallow flooding (up to 300mm) in low lying areas including Market Street, Church Street and the Ballydugan Road.
- 5.3.24 DfI Rivers consider the current coastal flood risk to Downpatrick to be extremely low. The Quoile Barrier currently protects the town from extreme tidal surges up to a predicted 0.1% AEP (1 in 1000 year) event. Based on current climate change predictions modelling indicates that coastal flood risk will increase with time, with the annual chance of the sea overtopping the Quoile Barrier eventually exceeding 10% by 2100.

Figure 7: Climate change floodmap Downpatrick



(Source as per footnote 54)

- 5.3.24 The Department for Infrastructure River Directorate has commissioned a feasibility study for the Downpatrick area to identify the flooding mechanisms, identify and assess a number of potential solutions and determine any viable solutions to alleviate future flooding.

5.4 Consultee and Stakeholder Engagement

- 5.4.1 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, providers of public utilities 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.
- 5.4.2 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.
- 5.4.3 A Briefing Paper outlining the proposed text of the policies for inclusion in the Draft Plan Strategy was presented to the Council's Planning Committee on 10 March 2021. Following this briefing, members voted to agree the draft planning policies for inclusion in the Plan Strategy and authorised the LDP Team to amend the draft policies as necessary in response to consultee engagement.

5.5 Draft Plan Strategy Approach

- 5.5.1 The Draft Plan Strategy seeks to prevent the development of areas known to be at risk from flooding, either now or due to the predicted impacts of climate change, unless a developer can demonstrate that the proposal meets at least one of the exceptions set out in operational policy. It also seeks to incorporate the inclusion of SuDS and other sustainable practices into new developments to mitigate the development increasing the risk of flooding both within its boundaries or in other locations.
- 5.5.2 The waste management strategy and policies have also been drafted to reflect the following objective for the plan, as was set out in as were set out in Table 3 in the draft Plan Strategy.
- Environmental; To reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding, change or land instability.
- 5.5.3 The Spatial Growth Strategy contains a Flood Risk and Drainage Strategy that includes Strategic Policy FRDS1 – Flood Risk and Drainage, which seeks to prevent development in areas that are at risk from flooding unless one of three exceptions can be demonstrated.
- 5.5.4 These exceptions are expanded upon in the six operational policies in the Draft Plan Strategy relating to Flood Risk and Drainage, five of these largely update and where necessary expand upon the existing policies set out in the Revised PPS15 Policy FRD1 – Development in Flood Plains is an update of the equivalent policy from the Revised PPS15, it prevents development within 1 in 100 year AEP fluvial flood plains or in areas affected by 1 in 200 year AEP coastal flood plains, unless the applicant can demonstrate that adequate flood defences exist within the area or that the proposal meets one of the six exceptions set out. The policy has been updated to include “a climate change allowance” in areas not currently affected by flooding but which are likely to be due to climate change.
- 5.5.5 Policy FRD2 – Protection of Flood Defence and Drainage Infrastructure, is updated from Revised PPS15 to include emergency works within the types of works to flood defence and drainage systems that new development cannot hinder. It also prohibits the erection of buildings or other structures over the line of a culverted watercourse, this is in line with Para 6.123 of the SPPS
- 5.5.6 Policy FRD3 - Development at Surface Water (Pluvial) Flood Risk Outside Flood Plains, carries over the equivalent provisions of the revised PPS15 but includes references to Flood Maps NI as a resource for establishing which areas are at risk of Pluvial flooding, both now and taking into account the likely effects of climate change.

- 5.5.7 Policy FRD4 – Artificial Modification of Watercourses, updates the equivalent provision of the Revised PPS15 to take into account changes introduced by Para 6.125 of the SPPS that establishes the existing reference to “a short length of watercourse” as being 10 metres in length.
- 5.5.8 Policy FRD5 – Development in Proximity to Reservoirs, incorporates changes introduced in paragraph 6.119 – 6.122 of the SPPS. The justification text also refers to the availability of the Inundation Maps on DfI Rivers’ website for the benefit of the public and developers.
- 5.5.9 Policy FRD6 – Sustainable Drainage Systems, is a new policy introduced as Paragraph 6.118 of the SPPS requires planning authorities to encourage developers to introduce SuDS as the preferred option drainage solution in new developments. The policy requires the provision of a drainage solution for all proposals for which a Drainage Assessment is required under the provisions of Policy FRD3.
- 5.5.10 Finally Policy RED1 – Renewable Energy, has a criterion that requires renewable energy projects not to cause a flood risk. This clause has been introduced to assess proposals for microhydroelectric energy generation, these can cause an increased flood risk if not designed or implemented properly. Rather than replicate the provisions of the Flood Risk and Drainage policies, RED1 “signposts” to these policies, a proposal for a microhydro scheme that fails any relevant flood risk policy, will also automatically be contrary to RED1.

5.6 Soundness

- 5.6.1 The LDP has been prepared to achieve the indicators of soundness as set out in the DfI Development Plan Practice Note: Soundness (Version 2, May 2017). The Draft Plan Strategy, in relation to the waste management strategy and subject policies and other relevant policies in this document is regarded as sound, as it is considered they have met the tests of soundness as summarised below:

Table 2: Soundness

Procedural Tests	
P2	The Council's Flood Risk and Drainage strategy and subject policies have been developed from and evolved from the POP, POP Consultation Report, Consultee and Councillor Engagement.
P3	The Flood Risk and Drainage strategy and subject policies have been subject to a Sustainability Appraisal.
Consistency Tests	
C1	The Flood Risk and Drainage strategy and subject policies have taken account of the Regional Development Strategy, in particular Strategic Guidance RG8, 9 and 10, as set out in paragraphs 5.1.3 - 5.1.5 of this Chapter.
C2	The Flood Risk and Drainage strategy and subject policies have taken account of the Council's Community Plan and the Corporate Plan, in particular the objectives seeking to boost the rate of recycling in order to improve the quality of the District's environment as per paragraphs 5.1.14-5.1.16 of this Chapter.
C3	The Flood Risk and Drainage strategy and subject policies have taken account of the provisions of the Strategic Planning Policy Statement as it relates to waste management, as per paragraphs 5.1.9 - 5.1.11 of this Chapter.
C4	The Flood Risk and Drainage strategy and subject policies have been developed by taking account of the existing development plans and Council strategies relating to Flood Risk and Drainage within Newry, Mourne and Down area as per paragraphs 5.1.17 – 5.1.18 of this chapter.
Coherence and the effectiveness tests	
CE1	The LDP has been developed alongside other Councils emerging and adopted LDP's and no conflict has been identified as per paragraphs 5.1.19 of this Chapter.
CE2	The Flood Risk and Drainage strategy and subject policies have been prepared on a sound evidence base, drawing on the baseline information set out in LDP Preparation Paper 9, which has been updated as required during the preparation of this Chapter.
CE3	Annual monitoring is not considered necessary as it is anticipated that the developers of projects likely to take account of the Flood Risk and Drainage Strategy and operational policies will make their requirements known through the preparation of the Local Policies Plan, or where necessary, the Development Management Process.
CE4	The Flood Risk and Drainage strategy and subject policies will be reviewed at Plan Review Stage.

2.7 Evolution of Policies

Table 3: Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy FLD1 – Revised PPS15. Provides guidance for the assessment of proposals is fluvial and coastal flood plains</p> <p>Policy FLD2 – Revised PPS15 Prevents development which would operational effectiveness of flood or drainage infrastructure or hinder their maintenance</p> <p>Policy FLD3 – Revised PPS15 Proposals for developments in areas affected by pluvial flooding outside of flood plains</p> <p>Policy FLD4 – Revised PPS15 Permits culverting or diversion of watercourses only in exceptional circumstances</p>	<p>RDS –RG8 'Assess the potential of flooding when selecting sites for development.'</p> <p>RG9 'Recognise the impacts of increasing flooding in adapting to climate change.'</p> <p>RG12 'More sustainable approach to water and sewerage provision including the incorporation of SuDS</p> <p>SPPS -Para 6.103 "To prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere."</p> <p>Regional Strategic Policy sets out revisions to operational policy to be incorporated into LDP's.</p>	<p>Paragraph 4.5 "Reduce impact of and mitigate against flooding."</p> <p>Key Issue 24 - In addition the Council would seek to address the issue of surface water flooding with SuDS being required on zoned sites through the use of key site requirements or alternatively incorporated into a new policy covering SuDS for all new development."</p>	None	<p>Flood Risk and Drainage Strategy FRDS1,</p> <p>Policy FRD1 – Development in Flood Plains, replaces PPS15 policy, updated and expanded criteria incorporating a climate change allowance into flood plains</p> <p>Policy FRD2 – Protection of Flood Defence and Drainage Infrastructure, prevents development over culverts</p> <p>Policy FRD3 – Pluvial Flood Risk updates current policy</p> <p>Policy FRD4 – Artificial Modification of Watercourses, updates existing policy</p> <p>Policy FRD5 – Development in proximity</p>

<p>Policy FLD5 – Revised PPS15 Allows development in the inundation areas of controlled reservoirs only in certain circumstances</p> <p>Supplementary Planning Guidance Provides additional guidance for certain circumstances</p>				<p>of controlled reservoir, new exemption for replacement buildings.</p> <p>Policy FRD6 – Sustainable Drainage Systems, new policy requiring incorporation of SuDS or similar in dew developments</p> <p>New Supplementary Planning Guidance</p>
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Appendices

Appendix A: Housing Evaluation Framework

Housing Evaluation Framework	
Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.
Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

Appendix B: Policy Development Table

Telecommunications and Other Public Utilities

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy PSU11 – PSRNI; Policy seeks to ensure the development of overhead lines while preventing areas becoming dominated with “wirescapes”</p> <p>Policy TEL1 – PPS10 Development of telecoms infrastructure while encouraging mast sharing and minimising visual intrusion.</p> <p>Policy CTY16 -PPS21 aims to prevent pollution incidents and mitigate the run off from septic tanks.</p> <p>Supplementary Planning Guidance DCAN13 Siting and Design of Radio Telecommunication Equipment</p>	<p>RDS RG3 – Implement a balanced approach to telecommunications infrastructure that will give a competitive advantage.</p> <p>RG5 – Deliver a sustainable and secure energy supply</p> <p>RG9 – Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality</p> <p>RG12- Promote a more sustainable approach to the provision of water and sewerage services and flood risk management</p> <p>SPPS – Core principle of Supporting Sustainable Economic Growth.</p> <p>Paras 6.235-6.238 Modern infrastructure gives a competitive advantage</p>	<p>KY19 Adoption of current regional policy, no areas of constraint on Telecommunications Development</p>	<p>No comments received to this specific area.</p>	<p>Strategic Policy TUS1 – Facilitate the provision of new infrastructure subject to criteria</p> <p>Policy TCU1 – Control of Telecommunications Development. Provides framework for assessing applications, proposals will not normally be considered in SCA’s</p> <p>Policy TCU2 – Future Proofing of New Developments for Telecommunications Infrastructure. Requires that all new developments have suitable ducting to accommodate future telecoms connections.</p> <p>Policy TCU3 - Public Services and Other Utilities, covers the installation of gas, electric and water infrastructure, seeks to minimise</p>

	<p>Para 6.246 - Sufficient land to meet public services should be zoned in LDP's</p> <p>Para 6.250 – New power lines should avoid AONB's</p>			<p>accumulations in protected areas.</p> <p>New Supplementary Planning Guidance</p>
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Renewable Energy

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy RE1 – PPS18. Provides guidance for the assessment of proposals for renewable energy generation</p> <p>Policy RE2 – PPS18. Seeks to incorporate microgeneration technologies and Passive Solar Design in new developments</p> <p>Supplementary Planning Guidance PPS18 Best Practice Guidance; Wind Energy Development in Northern Ireland's Landscapes; Draft SPG Anaerobic Digestion</p>	<p>RDS –RG5 "Deliver a sustainable and secure energy supply."</p> <p>RG9 "Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality."</p> <p>SPPS -Para 6.223 "Cautious approach in designated landscapes such as AONB's,</p> <p>SPPS Review – Para 1.17 Encourages use of previously developed land of low ecological value for solar power.</p> <p>Para 1.19 Introduces policy presumption for</p>	<p>KY9 Integrated Renewable Energy and PSD should be a requirement in certain new developments.</p> <p>KY18 Adopt current approach from regional policy but not designate Areas on Constraint on Renewable Energy Development</p>	<p>Public – Generally favourable however some criticism that more should be required</p> <p>DfI Notes that evidence base shows the District has not seen significant large scale renewables development</p> <p>NIEA Concerned over lack of Areas of Constraint</p> <p>Rivers Hydroelectric schemes can cause increased flood risk</p> <p>NIHE Would prefer to see suitable areas for Renewables development identified.</p>	<p>Renewable Energy and Low Carbon Technologies Strategy RES1 Promote the development of RE generation in appropriate locations and promote to incorporation of microgeneration and PSD in new developments</p> <p>Policy RED1 – Renewable Energy, replaces RE1, new criteria for flood risk and transport safety and dedicated sub-sections for solar/PV and anaerobic digestion included</p> <p>Policy RED2 Replaces RE2 and seeks to promote microgeneration and PSD</p>

	renewal and life extension of renewable energy generations sites including repowering.			New Supplementary Planning Guidance
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Waste Management

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy WM1 – PPS11. Provides guidance for the assessment of impacts from waste management facilities</p> <p>Policy WM2 – PPS11. Sequential Test for Waste Management Facility proposals</p> <p>Policy WM3 – PPS11 Proposals for waste management facilities</p> <p>Policy WM4 – PPS11 Disposal of inert waste by infilling</p> <p>Policy WM5 – PPS11 Development in vicinity of facilities</p> <p>Supplementary Planning Guidance DCAN10, applies for applications</p>	<p>RDS –RG10 “Managing our Waste Sustainably.” Waste Hierarchy</p> <p>SPPS -Para 6.310 “Promote waste management and recycling facilities in appropriate locations, minimisation of detrimental effects and appropriate restoration measures “</p> <p>Regional Strategic Policy sets out sequential test for sites and Waste Hierarchy</p>	None	None	<p>Waste Management Strategy WSM1 Support the development of sustainable waste management recycling and disposal facilities in appropriate locations,</p> <p>Policy WM1 – Waste Management Development, replaces PPS11 policy, updated and expanded criteria</p> <p>Policy WM2 – Waste Collection and Treatment Facilities, Replaces PPS11 policy, sequential test for sites</p> <p>Policy WM3 – Waste Disposal, replaces PPS11 version, need for a facility must be established by WMS or WMP</p>

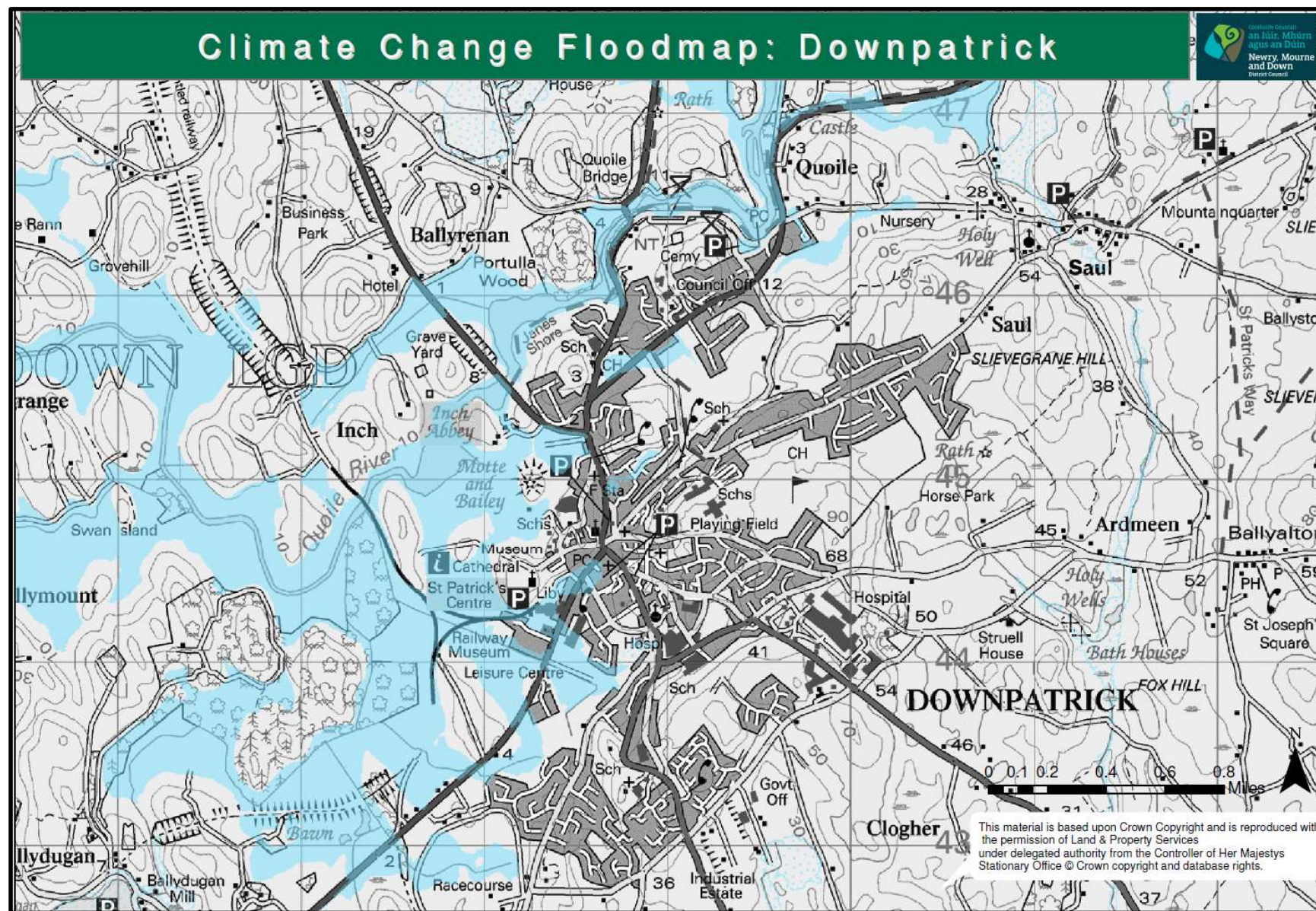
that need Environmental Impact Assessment				<p>Policy WM4 – Land Improvement, Replaces PPS11 version, disposal of inert waste</p> <p>Policy WM5 – Development in vicinity of Waste Management Facilities, prevents inappropriate developments near facilities.</p> <p>New Supplementary Planning Guidance</p>
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Flood Risk and Drainage

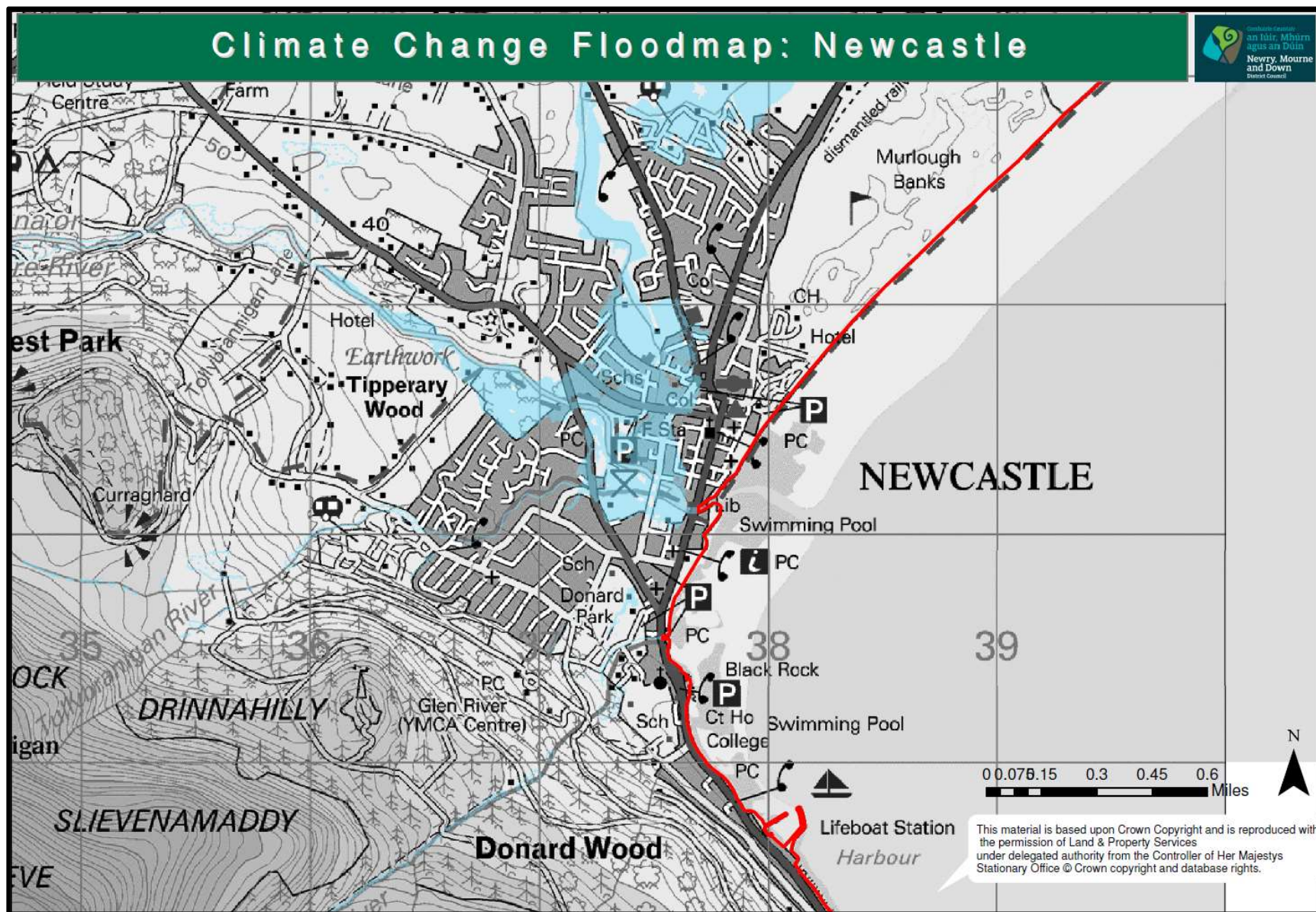
Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>Policy FLD1 – Revised PPS15. Provides guidance for the assessment of proposals is fluvial and coastal flood plains</p> <p>Policy FLD2 – Revised PPS15 Prevents development which would operational effectiveness of flood or drainage infrastructure or hinder their maintenance</p>	<p>RDS –RG8 'Assess the potential of flooding when selecting sites for development.'</p> <p>RG9 'Recognise the impacts of increasing flooding in adapting to climate change.'</p> <p>RG12 'More sustainable approach to water and sewerage provision including the incorporation of SuDS</p>	<p>Paragraph 4.5 "Reduce impact of and mitigate against flooding."</p> <p>Key Issue 24 - In addition the Council would seek to address the issue of surface water flooding with SuDS being required on zoned sites through the use of key site requirements or alternatively incorporated into a new policy covering</p>	None	<p>Flood Risk and Drainage Strategy FRDS1,</p> <p>Policy FRD1 – Development in Flood Plains, replaces PPS15 policy, updated and expanded criteria incorporating a climate change allowance into flood plains</p> <p>Policy FRD2 – Protection of Flood Defence and Drainage Infrastructure, prevents development over culverts</p>

<p>Policy FLD3 – Revised PPS15 Proposals for developments in areas affected by pluvial flooding outside of flood plains</p> <p>Policy FLD4 – Revised PPS15 Permits culverting or diversion of watercourses only in exceptional circumstances</p> <p>Policy FLD5 – Revised PPS15 Allows development in the inundation areas of controlled reservoirs only in certain circumstances</p> <p>Supplementary Planning Guidance Provides additional guidance for certain circumstances</p>	<p>SPPS -Para 6.103 “To prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere.”</p> <p>Regional Strategic Policy sets out revisions to operational policy to be incorporated into LDP’s.</p>	<p>SuDS for all new development.”</p>		<p>Policy FRD3 – Pluvial Flood Risk updates current policy</p> <p>Policy FRD4 – Artificial Modification of Watercourses, updates existing policy</p> <p>Policy FRD5 – Development in proximity of controlled reservoir, new exemption for replacement buildings.</p> <p>Policy FRD6 – Sustainable Drainage Systems, new policy requiring incorporation of SuDS or similar in dew developments</p> <p>New Supplementary Planning Guidance</p>
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Appendix C: 1/100 year Climate Change Floodmap: Downpatrick



Appendix D: 1/100 Year Climate Change Floodmap: Newcastle



Climate Change Floodmap: Newry



This map shows the River Donaghadee and surrounding areas in Newry, Northern Ireland. The map includes labels for various locations such as Maytown, Damolly, Rath, Crobane, Benagh, Carrickbracken, Carrickbracken Wood, Camlough, Carrickbracken Wood, Cross, Camlough Mountain, Camlough Wood, Tamnaghbane, Ballinliss, Seafin, Cloghoge Mountain, and Milltown. It also shows roads, bridges, and other landmarks. A scale bar at the bottom right indicates distances in miles (0 to 1.2). A north arrow is also present.

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Appendix F: Wastewater Treatment Works

As displayed below, NI Water have devised a new informative to convey both the present capacity condition of each of its Wastewater Treatment Works and also how this condition may change depending on a range of potential growth scenarios. The Informative presents two sets of indicators; one relating to current capacity and the associated impact on the availability of new sewerage connections; the second is an estimated projection of treatment capacity were prescribed growth factors to be applied to the existing drainage catchment flows.

Figure 1: Current Capacity

Settlement	Name of Works	Current Status	Estimation of Future Capacity based on Growth Factor			Comment
			10%	20%	30%	
Any Town	Any Town WwTW		✓	✓	✓	
Any City	Any City WwTW		⊘	x	x	
Any Village	Any Village WwTW		x	x	x	No public sewerage system exists.
Any Hamlet	Any Hamlet WwTW		✓	✓	✓	Catchment flows pumped to Any Town WwTW
Another Village	Another Village WwTW		✓	✓	✓	A project exists within current Business Plan to upgrade this facility

Key



New Connections permitted – Capacity Available



Restricted Planning – Limited Capacity



New connections refused – No Capacity



Works has 'Reasonable Capacity'



Works is 'At or Reaching Capacity'








Works has 'Insufficient Capacity'

The indicators are a combination of Red, Amber and Green (RAG) traffic lights for current capacity and a variety of tick box symbols for future capacity. The distinct formats were adopted to help emphasise the certainty of the current status compared with the more speculative conclusion looking forward. The respective keys explain the relevant implications, information on planned investment for wastewater treatment or other relevant information will appear as a supplementary comment against each listed WWTW. The current capacity for settlements within this District has been provided overleaf.

Figure 2: Status and Capacity of Wastewater Treatment Works (June 2024)

Wastewater Treatment works	Current Planning Status	Estimation of Capacity based on Growth Factor			Comment
		10%	20%	30%	
Annacloy (WWTW)		✓	✓	⊘	
Annalong (WWTW)					Query
Ardglass (WWTW)		✓	✓	✓	
Ballykinler (WWTW)		✓	✓	⊘	
Ballynahinch (Down)		✓	✓	✓	
Blackrock Retention Tank (Down)					Query
Clough (WWTW)		x	x	x	
Coneyisland (WWTW)		⊘	⊘	⊘	
Downpatrick (WWTW)		✓	✓	✓	
Drumaness (WWTW)		⊘	⊘	⊘	
Drumroad (WWTW)		⊘	⊘	x	
Dundrum (Down)		✓	✓	✓	Upgrade of this WwTW planned during 2015-2021
Glassdrumman (Down)		✓	✓	⊘	
Kilkeel (WWTW)		✓	✓	⊘	

Killough (Retention Tank)					Query
Killyleagh (WWTW)		✓	✓	✓	
Lisowan		⊘	x	x	
Loughinisland (WWTW)		x	x	x	
Maghera (Down)		⊘	⊘	x	
Newcastle (WWTW)		✓	✓	⊘	
Saintfield (WWTW)		⊘	x	x	
Strangford		✓	✓	✓	
Thorney Glen		⊘	⊘	⊘	
Annsborough		⊘	x	x	
Attical (WWTW)		✓	✓	✓	
Ballymaderphy		x	x	x	
Bankside Shinn		⊘	⊘	⊘	
Beech Hill South		⊘	⊘	⊘	
Belleek (Armagh)		✓	⊘	⊘	
Cranfield (Down)					Query

Lurganare		x	x	x	
McKinley Park		x	x	x	
Meigh (WWTW)		x	x	x	
Mountain View (Drumintee)		⊘	⊘	⊘	
Mullaghglass (Newry)		⊘	⊘	⊘	
Newry (WWTW)		✓	✓	✓	
Newtownhamilton		✓	✓	✓	
Oliver Plunkett Park		x	x	x	
Rathfriland (WWTW)		⊘	x	x	
Silverbridge		⊘	⊘	⊘	
Warrenpoint (WWTW)		⊘	x	x	
<div> <div> Key to Current Planning Status  New connections permitted - Capacity Available  Restriction on new connections - Capacity Limited  New connections refused - No Capacity </div> <div> Key to Local Development Planning  Works has 'Reasonable Capacity'  Works is 'At or reaching Capacity'  Works has 'Insufficient Capacity' </div> </div>					

Crossmaglen		✓	⊖	⊖	
Cullaville		✓	⊖	⊖	
Cullyhanna (WWTW)		⊖	⊖	x	
Dorsy		⊖	⊖	⊖	
Drumilly		⊖	⊖	⊖	
Drumintee		✓	✓	✓	
Forkhill		✓	✓	✓	
Glassdrumman (Armagh)		x	x	x	
Glen Villas		x	x	x	
Hilltown (WWTW)		⊖	⊖	⊖	
Jonesborough (WWTW)		✓	✓	✓	
Kilcoo		✓	✓	✓	
Killeen (Armagh)		⊖	⊖	⊖	
Leitrim (New)		⊖	⊖	⊖	
Lislea (New)		⊖	⊖	⊖	
Lisnalea		⊖	⊖	⊖	

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