



Draft Plan Strategy Representation Form

Please complete this representation form online and email to ldp@nmandd.org or alternatively print and post a hardcopy to: -

Local Development Plan Team
Newry, Mourne and Down District Council
Downshire Civic Centre
Downshire Estate, Ardglass Road
Downpatrick BT30 6GQ

ALL REPRESENTATIONS MUST BE RECEIVED NO LATER THAN 5PM ON MONDAY 22 SEPTEMBER 2025

Section A | Your Details

Q1 Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? Please only tick one:

- ☐ **Individual** (Please fill in the remaining questions in this section, then proceed to Section B)
- ☐ **Organisation** (Please fill in the remaining questions in this section, then proceed to Section C)
- ☒ **Agent** (Please fill in the remaining questions in this section, then proceed to Section D)

Q2 What is your name?

Title

First Name Last Name

Address

Email

Q3 Did you respond to the previous Preferred Options Paper?

- ☐ Yes ☒ No ☐ Unsure

Section B | Individuals (if different to Q2 above)

Address

Town Postcode

Section C | Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section.

Organisation / Group Name			
Your Job Title / Position			
Organisation / Group Address (if different to above)			
Address			
Town		Postcode	

Section D | Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title			
First Name		Last Name	
Address			
Town		Postcode	

Q4

Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP? (please select one item only)

☐ Agent
 ☐ Client
 ☒ Both

Section E | Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section I.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be unsound having regard to the soundness tests in Section I. It is important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally at the Independent Examination.

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Section I | Tests of Soundness

Procedural tests

- P1** Has the plan been prepared in accordance with the Council's Timetable and the Statement of Community Involvement?
☐ Yes ☐ No
- P2** Has the Council prepared its Preferred Options Paper and taken into account any representations made?
☐ Yes ☐ No
- P3** Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
☐ Yes ☐ No
- P4** Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?
☐ Yes ☐ No

Consistency test

- C1** Did the Council take account of the Regional Development Strategy?
☐ Yes ☐ No
- C2** Did the Council take account of its Community Plan?
☐ Yes ☐ No
- C3** Did the Council take account of policy and guidance issued by the Department?
☐ Yes ☐ No
- C4** Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?
☐ Yes ☐ No

Coherence and Effectiveness tests

- CE1** The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
☐ Yes ☐ No
- CE2** The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
☐ Yes ☒ No
- CE3** There are clear mechanisms for implementation and monitoring.
☐ Yes ☒ No
- CE4** The plan is reasonably flexible to enable it to deal with changing circumstances.
☐ Yes ☒ No

Section J | Which part(s) of the draft Plan Strategy are you commenting on?

Your response should clearly relate to the relevant section, paragraph or policy of the draft Plan Strategy. If you consider more than one part of the draft Plan Strategy is unsound, please number your issues clearly and provide this information in the same running order following your original comment (i.e. relevant Policy, Section or Proposals Map).

Relevant Policy number(s)	HS1 & HS3
(and/or)	
Relevant Section/Page Number	Pages 83 & 84 (HS1) and Pages 86 & 87 (HS3)
(and/or)	
Proposals Map	

Section J | Which part(s) of the draft Plan Strategy are you commenting on?

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as clear and concise as possible.

HS1 - Table 7 (page 83) notes the indicative allocation for Ballynahinch as 676 units and 1,103 with phase 2 sites. HS3 (page 86) states that Phase 2 sites will only be released where, through monitoring or re-appraisal of future housing need, the housing sites will be required. HS3 text notes that the mechanism and any associated criteria for how these sites will be released will be outlined within the Local Policies Plan (LPP). The result of this is that there is considerable uncertainty over whether Phase 2 sites would be available in the context of their association with the town's by-pass and, if available, the mechanism/criteria for their release. The current LDP Timetable estimates that the LPP will be adopted in Q3 2028/29 but this is only an indicative date. It is considered that the draft Plan Strategy (dPS) is unsound as the allocation (HS1) and the management of supply (HS3) does not adequately address the 'plan, monitor and manage' approach to ensure, as a minimum, a 5-year supply of housing land within the town.

Technical Supplement 2 (TS2) adds to the uncertainty as it states that the increase in the number of households in the Council area was higher than projected by NISRS, that housing need has remained at a consistently high level between 2013 and 2023 and that, under the CE2 and CE4 tests, housing provision will be reviewed at the Plan review stage. TS2 Appendix B noted a 10% non-implementation allowance in addition to the 10% flexibility allowance. The basis for the non-implementation 10% is unclear as TS2 notes that recommended additional work in relation to the Phase 2 zoning is necessary to demonstrate compliance with CE2 and CE3.

If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.

In light of the fundamental importance of the 'plan, monitor and manage' approach, it is considered that the following changes would contribute to making the dPS sound:

- (i) robust assessment at the dPS stage (i.e. in advance of the LPP stage) on whether the major housing zoning (427 units) can be delivered within the Plan period as they are reliant on a major road scheme to be funded by the Department for Infrastructure. It is noted that the major zoning was included in previous plans but not delivered.
- (ii) confirmation by the Department for Infrastructure on the possible programme for the delivery of the by-pass, the key stages requiring 'sign-off' before commencement and the construction period from start to completion.
- (iii) robust assessment of the evidence for the 10% non-implementation allowance to inform whether the 10% allowance is appropriate in the context of changing circumstances over the plan period.
- (iv) identify additional sites for smaller (non-strategic) zonings at the dPS stage rather than at the LPP stage as noted in TS2.
- (v) in light of the above, consider the land shown on the attached plan for inclusion as a non-strategic zoning at the dPS stage as it adjoins the settlement development limit, enjoys good access from the Chestnut and Riverside Roads, is not subject to any natural environment or built heritage designations, would not mar the distinction between Ballynahinch and the countryside and is not dependent on the delivery of the Ballynahinch by-pass.

Section K | Monitoring

Do you consider there are clear mechanisms for implementation and monitoring of the draft Plan Strategy?

☐ Yes ☒ No

Do you have any comments?

It is considered that the matter of housing need and supply and the ability to meet the soundness tests of CE2, CE3 and CE4 depends on the assessment of three elements namely the suitability, the availability and, importantly, the deliverability of housing land at the dPS stage and not simply at the LPP stage.

Section 7 Monitoring and Review of the dPS notes that the annual monitoring report will focus on four indicators namely housing land supply, number of net additional units built, supply of land for economic development purposes and other issues deemed by the Council to be relevant to the implementation of the Local Development Plan.

Whilst the annual monitoring of the above four indicators is welcome and appropriate, it is considered that the absence of the monitoring of 'deliverability' is a weakness in the monitoring strategy. A review trigger could be introduced to address the matter of the non-deliverability of a housing zoning - this matter has already been noted in relation to Phase 2 lands which had been previously included in plans but, significantly, not delivered. The monitoring of the non-deliverability of Phase 1 lands should also be part of the monitoring and review process.

Section L | Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

Do you have any comments on the SA?

No comments on the SA.

Section M | Habitats Regulation Assessment (HRA)

Do you have any comments on the HRA?

☐ Yes ☒ No

If you have indicated Yes, please set out your comments on the HRA below:

Section N | Equality Impact Screening Report (EQIA)

Do you have any comments on the EQIA?

☐ Yes ☒ No

If you have indicated Yes, please set out your comments on the EQIA below:

Section O | Rural Needs Impact Assessments (RNIA)

Do you have any comments on the RNIA?

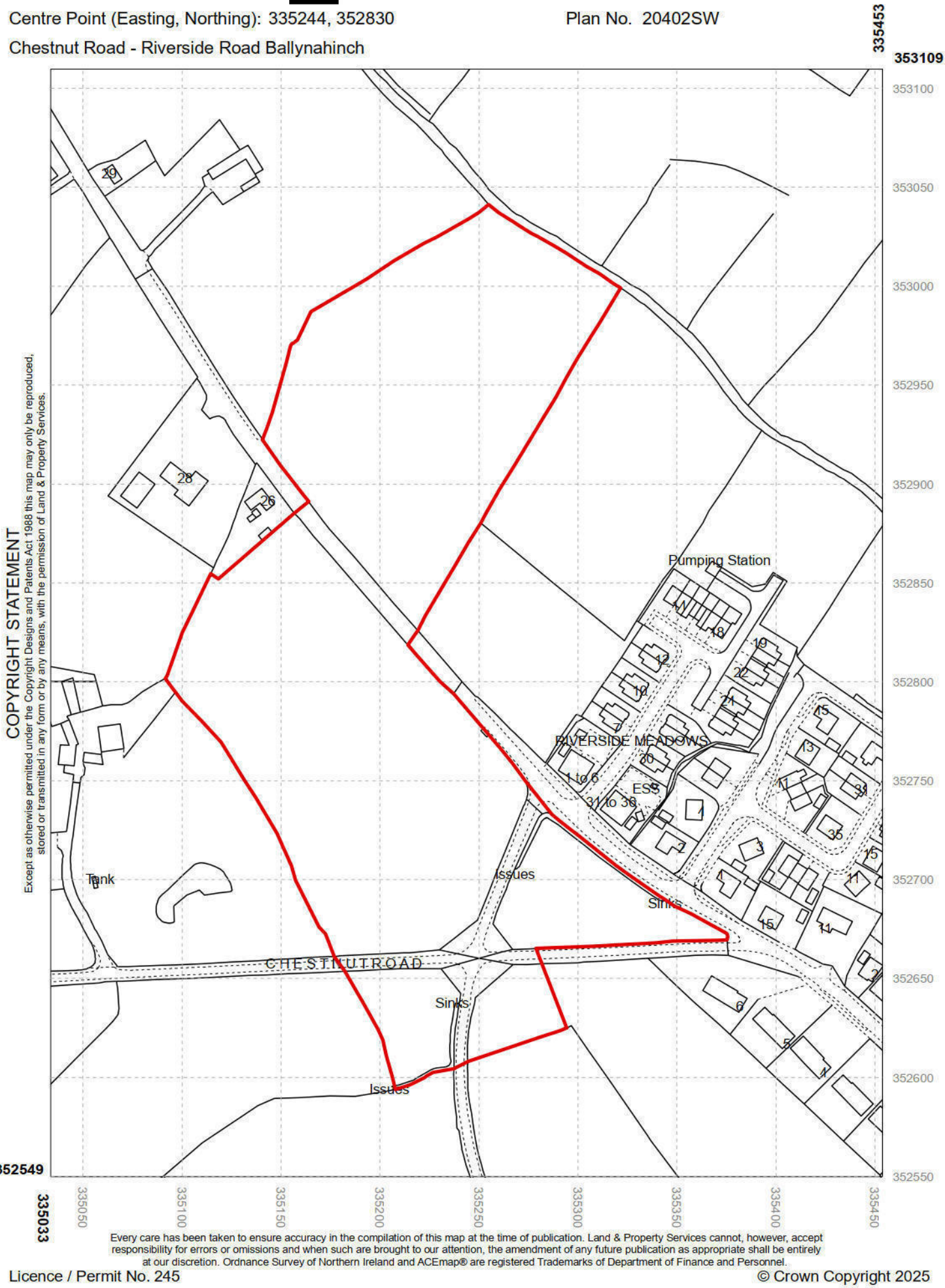
☐ Yes ☒ No


If you have indicated Yes, please set out your comments on the RNIA below:

ACEmap® Single

Printed: 01/09/2025 Customer Ref:
Centre Point (Easting, Northing): 335244, 352830
Chestnut Road - Riverside Road Ballynahinch

Scale: 1:2,500
Order no. ORD174919
Plan No. 20402SW



RPP REFERENCE NO. [REDACTED]			- P R E L I M -							REVISION HISTORY		
CLIENT: [REDACTED]			DRAWING: Site Location							REV	DESCRIPTION	DATE
PROJECT: Chestnut Road & Riverside Road, Ballynahinch												
	BELFAST 155-157 DONEGALL PASS BELFAST BT7 1DT T 028 9024 5777		L'DERRY 18 CLARENDON ST L'DERRY BT48 7ET T 028 7136 2782		SHEET SIZE	SCALE(S)	DRAWN BY	CHECKED BY	STATUS CODE	REVISION	ALL DIMENSIONS TO BE CHECKED ON-SITE, PRIOR TO COMMENCEMENT. ANY DISCREPANCIES/OMMISSIONS TO BE HIGHLIGHTED TO ARCHITECT IMMEDIATELY. RPP ARCHITECTS LTD TAKE NO RESPONSIBILITY FOR THIRD PARTY SURVEY INFORMATION, CONTAINED IN THIS DRAWING. THIS DRAWING TO BE READ IN CONJUNCTION WITH CIVIL AND STRUCTURAL ENGINEERS DRAWINGS/INFORMATION & SPECIFICATIONS. THIS DRAWING IS COPYRIGHTED © TO RPP ARCHITECTS LTD. & PREPARED FOR USE BY OUR CLIENT ONLY. IT MAY NOT BE USED, MODIFIED, REPRODUCED OR RELIED UPON BY THIRD PARTIES, EXCEPT AS AGREED WITH RPP ARCHITECTS LTD.	
	EMAIL: INFO@RPPARCHITECTS.CO.UK		WEB: RPPARCHITECTS.CO.UK		A3	1:2500	-	-	S0	-		
					PROJECT	ORIGINATOR	VOLUME/ SYSTEM	LEVEL/ LOCATION	TYPE	ROLE		NUMBER
				[REDACTED]	RPP	XX	XX	DR	A	000001		