



Response to Newry, Mourne and Down District Council

Local Development Plan (LDP) 2035

Draft Plan Strategy June 2025

By the Chartered Institute of Housing Northern Ireland

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The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and a not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

Consultation response

- a. Do you consider the plan strategy to be sound or unsound?

Sound

- b. If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy, please set out your comments below.

Introduction

The Chartered Institute of Housing (CIH) Northern Ireland welcomes the opportunity to comment on the Newry, Mourne and Down District Council's Local Development Plan (LDP) draft plan strategy. As the independent voice for housing, CIH is committed to ensuring that housing policy serves the public interest and meets the needs of all residents. Our response is informed by our expertise in affordable housing policy and practice, and by the collective experience of our diverse membership across the public, private, and voluntary sectors. We have considered this LDP in light of the significant housing needs identified in the most recent Northern Ireland Housing Executive (NIHE) Housing Needs Assessment for the district, which highlights the critical role of new supply in meeting demand.

General position

CIH Northern Ireland supports the ambitious vision outlined in the draft plan strategy and its proactive approach to addressing the significant housing need within the district. The integration of affordable housing into residential developments is a crucial step towards creating more inclusive, sustainable and socially balanced communities. We therefore welcome the policy on affordable housing, which aligns with the requirements of the Strategic Planning Policy Statement (SPPS) and is a vital component of a sound LDP.

Key recommendations and comments

1. Affordable housing policy (HOU5)

We welcome the comprehensive affordable housing policy (HOU5) and its general expectation of on-site provision. This approach is key to achieving mixed-tenure communities and is consistent with the principle of integrating affordable homes within private developments. We recognise that the Social Housing Development Programme (SHDP) remains the primary delivery vehicle for new social housing, but the provision of opportunities for social housing in private developments is a supplementary mechanism that can significantly contribute to addressing housing need and supporting a balanced housing market.

To help optimise the delivery of these homes and streamline the development process, the council should satisfy itself that the proposed contribution level is viable in consideration of local market mechanics and development costs. While on-site provision should be the default, certain local market characteristics may mean that off-site provision or commuted sums are more desirable to best meet a specific housing need and ensure value for money.

Should commuted sums be accepted, it is critical that there is a clear and transparent framework for how these funds will be calculated and used, with outcomes effectively monitored to ensure they are reinvested locally. In this context, we recommend the council be clear on the roles and responsibilities of all stakeholders. As the council cannot directly deliver

social housing and central government holds the primary powers for significant regeneration, it is appropriate that any commuted sums collected through a Section 76 agreement are transferred to a body with relevant statutory responsibilities, normally the Department for Communities (DfC) and/or NIHE. We also recommend that DfC and/or NIHE are consulted and made a signatory to any Section 76 Agreement where commuted sums are being considered, to ensure robust governance and effective delivery. This process will also require the council to drive early discussion and clearly identify all stakeholders to ensure a shared understanding and commitment to the project outcomes.

To further assist with viability calculations and provide developers with greater certainty from the outset, we recommend that the council explores the potential for a clear, standardised contribution methodology, rather than overly relying on case-by-case negotiation. Our experience with planning obligations for affordable housing across Great Britain and Ireland has shown that policies with less ambiguous requirements generally lead to more successful results. For example, a clear percentage land contribution requirement would provide developers with the clarity needed to factor affordable housing requirements into their financial planning, thereby optimising negotiation times and ensuring more efficient outcomes for all stakeholders.

2. Design and integration

We are pleased to see the principle of tenure-blind design embedded within the strategy. High-quality, tenure-blind design is a key element of good placemaking, supporting the sustainability and longevity of developments. It also serves to avoid tenure-based stigma and fosters a sense of shared community, ensuring all residents feel equally valued regardless of their housing tenure. This approach aligns with good practice in creating high-quality, integrated developments and is vital for building mixed and inclusive communities. We strongly support the council's commitment to this principle.

3. Strategic engagement and partnership

To maximise the successful delivery of new housing, we recommend that the council be proactive in its engagement with the housing sector. Early collaboration between council planners, registered housing associations and other housing providers, and private developers is essential. This partnership working can help ensure that new residential schemes are not only viable but also meet the specific housing needs of the district, including the needs of the most vulnerable people. This will also help to share knowledge and expertise, laying the foundations for more practical and effective housing solutions.

4. Affordable housing in the countryside (COU3)

We welcome the recognition of the need for viable and sustainable housing solutions in rural areas. It is important that the LDP provides flexibility to address the unique challenges of rural communities while still ensuring a contribution to affordable housing.

In conclusion, CIH Northern Ireland supports the overarching aims of the draft plan strategy. We believe that by incorporating these recommendations, the council can strengthen its LDP, making it a more robust and effective tool for delivering the right homes in the right places for the people of Newry, Mourne and Down. We are available to provide further assistance and look forward to continued engagement.