

Written Representation on behalf of [REDACTED]
[REDACTED]**Landowner in Newtowncloghoge (sites 2, 3, 4, 6 and 7 Appendix 1)**

This representation will follow the format requested by the consultation in relation to commenting on some of the 'tests' however will deviate due to the presentation of settlement limits in the map viewer.

It is felt that the limit for Newtowncloghoge is too restrictive and will not allow for future growth or the potential of the settlement to provide further services to the local community, which is not in line with regional guidance.

The areas zoned for development in the 2015 plan have all been built out and there is a need for the settlement limit to be expanded to accommodate demand for growth.

This statement will demonstrate that the proposed expansion is justified and consistent with relevant planning policies, addressing all material considerations.

Procedural Tests

P1. Has the plan been prepared in accordance with the Council's Timetable and the Statement of Community Involvement?

1. The Council will be aware that it is behind on its timetable and while this is disappointing, the difficulties the planning staff are working under is acknowledged and it is hoped that time can be made up over the coming months to allow for more localised representations to take place in early 2026. This statement will cover some localised issues as settlement limits have been provided (via the NMDDC Local Development Plan 2035 -Map Viewer) and it must be acknowledged that these are not accepted by all parties as agreed settlement limits going forward.

Consistency Tests

C1. Did the Council take account of the Regional Development Strategy?

2. The Housing Growth indicators published in 2016 by the Department for Infrastructure provide initial estimates which have been increased slightly in the plan to 11,000, the table is presented below for information.

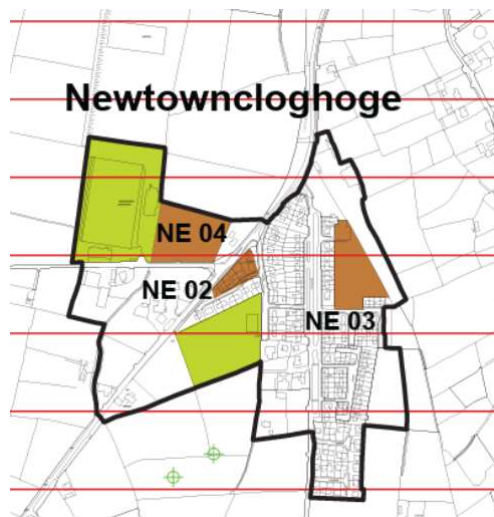
Table A2: Comparison of LGD level Housing Growth Indicators 2016-2030 with recent new dwelling completion rates

Local Government District	Projected new dwelling requirement 2016-2030 ¹	Comparison 15 year figure using recent completion rates ²
Antrim and Newtownabbey	4,200 dwellings	8,160 (544 x 15)
Ards and North Down	5,500 dwellings	10,275 (685 x 15)
Armagh, Banbridge and Craigavon	17,200 dwellings	13,755 (917 x 15)
Belfast	7,400 dwellings	10,065 (671 x 15)
Causeway Coast and Glens	5,600 dwellings	8,565 (571 x 15)
Derry City and Strabane	4,100 dwellings	7,680 (512 x 15)
Fermanagh and Omagh	4,300 dwellings	4,935 (329 x 15)
Lisburn and Castlereagh	10,700 dwellings	11,580 (772 x 15)
Mid and East Antrim	5,400 dwellings	6,405 (427 x 15)
Mid Ulster	10,300 dwellings	10,680 (712 x 15)
Newry, Mourne and Down	10,000 dwellings	9,690 (646 x 15)

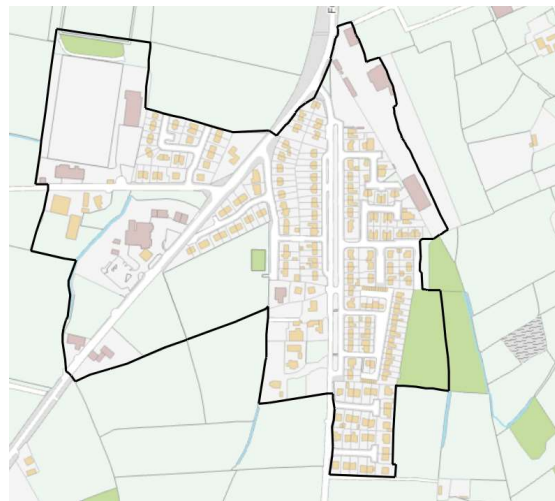
¹ Estimate of housing need by Local Government District 2016-2030 (see Table 1 and Table 3 on pages 6 and 13 respectively) - derived by estimating each of the key components at LGD level and combining to form the HGI for each LGD.

² An approximate figure of new dwelling completions per annum (given in brackets) has been worked out using LPS new dwelling completions data over the time period 2015-16 to 2018-19 (the full time series available at 11 LGD level). 2016 to 2030 is a 15 year period so the calculated average figure has been multiplied by 15 to give a figure that can be compared with the projected new dwelling requirement 2016-2030.

3. This table illustrates that on a lower projection of 9,690 the Newry, Mourne and Down area should be building approximately 646 dwellings per year to meet demand.
4. Table 20 in the Plan Strategy, Technical Supplement 2, Housing shows that this requirement is not being met with 355 Housing Unit Completions in 2020-21, 514 in 2021-22 and 470 in 2022-23. Current pattern as set on in Table 20 could see as little as 5,356 built in the plan period, which is less than half of what is required.
5. With the plan target of 11,000 dwellings during the plan period (2020-2035) that means that there is a requirement to build 733 dwellings per year, a figure which is being missed by a significant amount every year. Indeed Section 3 of the Technical Supplement 2, Housing, Key Issue 2, Quantity of Housing Land states that the preferred options paper provided an adjusted figure for the 2012-2030, over an 18-year period was 15,092 or 838.4 per annum.
6. This deficit in supply is something that the plan must address and while the development of 'brownfield' sites is preferred it should not be pursued at the detriment to housing supply, which has major implications on various other societal issues. Settlements such as Newtowncloghoge, which are located close to larger urban centres, have a role to play in meeting this demand and consideration should be given to the expansion of settlement limits in these locations. The settlement has seen regular demand for housing over the 2020-23 period, a demand which outstrips many villages in the area.
7. The area plan aims to provide for vital and vibrant rural communities in villages and small settlements which meet the daily needs of their rural hinterland, whilst protecting the countryside by accommodating sustainable growth, providing for 11,000 new homes by 2035 across a mix of housing type, size and tenure in accessible locations.
8. To accommodate the 11,000 new homes consideration should be given to recategorizing some small settlements as villages and providing opportunities for expansion. Newtowncloghoge has a population larger than several villages and over recent years has seen the expansion of services including a garage, post office, retail units, expansion of Killeavy GAA ground and clubhouse, gym etc. Warrenpoint Educational Trust have also recently gained planning approval (November 2022) for a new Brethren Primary and Secondary school (including gym, school meals provision, classrooms and external playing fields (P/2009/1417/F).

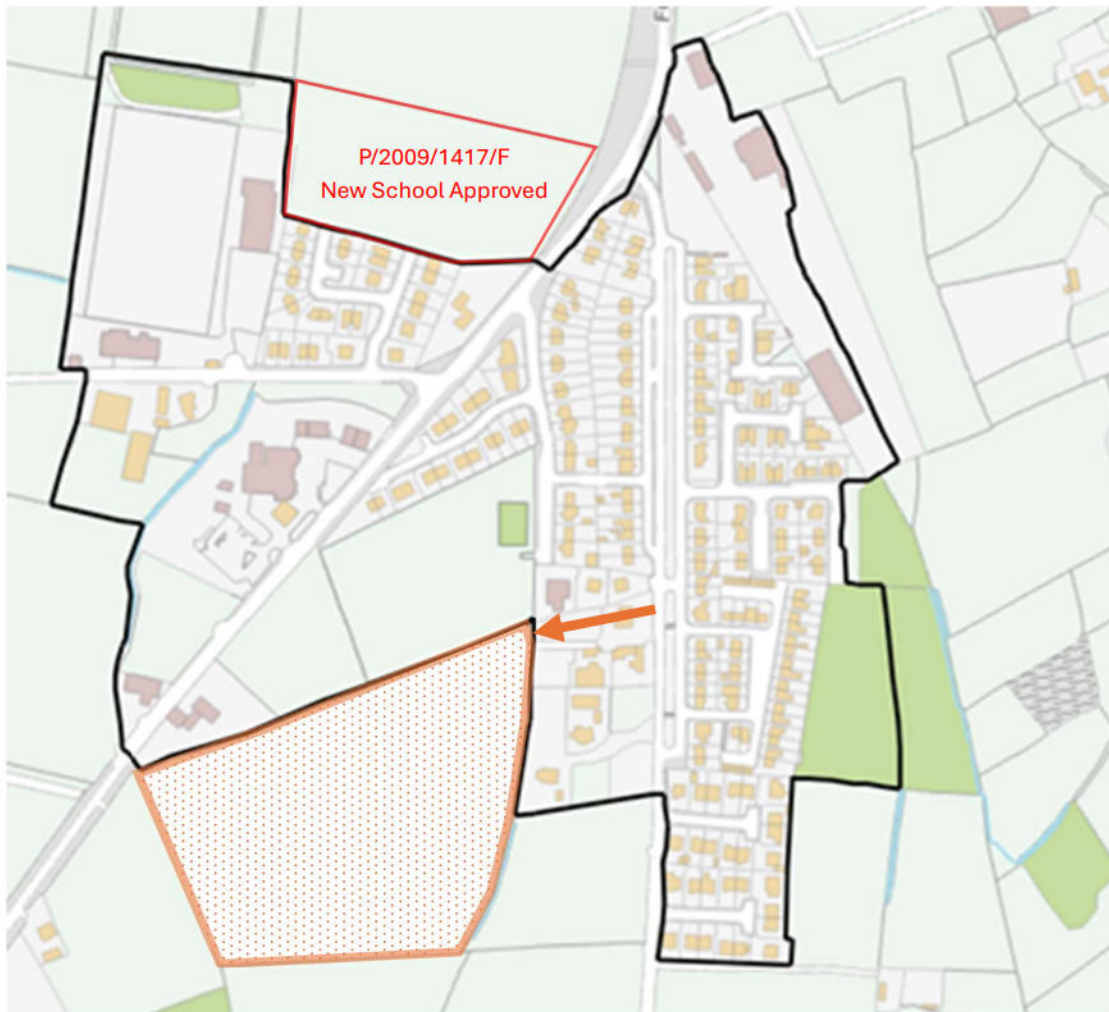


2015 Area Plan



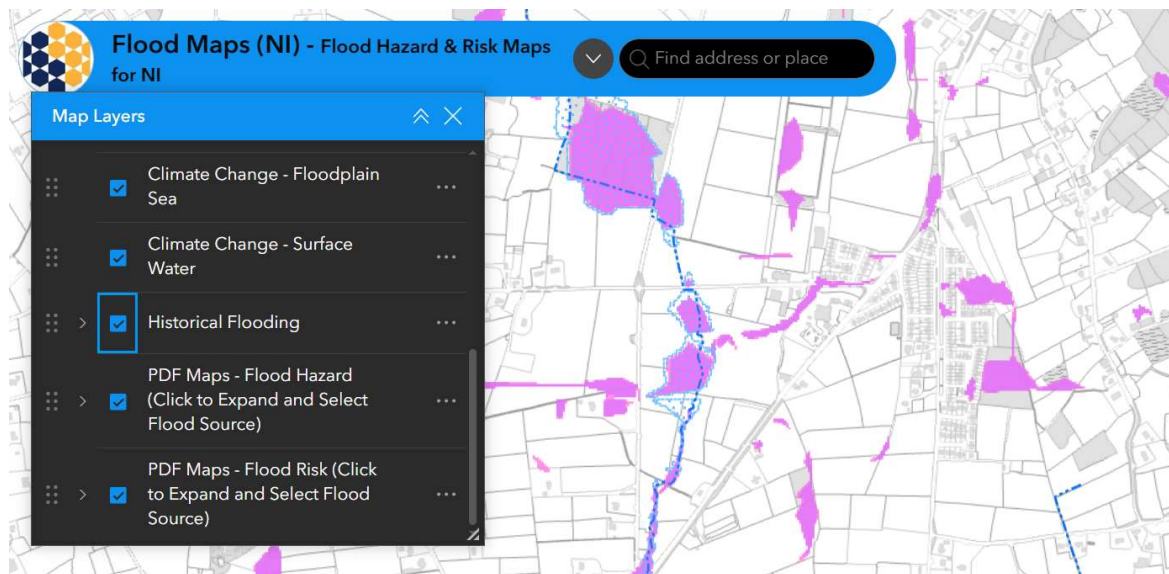
Map Viewer Provided with this consultation

9. Newtowncloghoge provides the perfect opportunity for expansion with its close proximity to Newry and the A1 road corridor (8 mins to Newry Train Station) and the Park and Ride on the A1 Belfast Road offering a facility with 25 parking spaces. This is a priority location for the Park and Ride Management Board, serving the A1 corridor and could be subject to expansion in the years to come. The settlement is also in close proximity to Newry Wastewater Treatment Works so provides opportunities to make connections, where settlements/villages further from the city will struggle.



10. [REDACTED] proposes the expansion of the development limit to the south of Newtowncloghoge that would bring in three fields, round off the settlement and provide an opportunity to expand the settlement to include a mix of uses i.e. housing and community provision (he has control of the access illustrated).
11. There is likely to be a potential for limited impact on the amenities of neighbouring properties, with issues such as overlooking, loss of privacy, and overshadowing unlikely to be a problem in this location. Access off Newtown Road will ensure safe and convenient access for vehicles, pedestrians, and cyclists. The location is the most sustainable option for the development, considering access to services, facilities, and public transport.
12. It is acknowledged that there are raths in this area however these can be worked around and buffer zones applied to any proposal, with the information provided as to their importance/history as part of an open space area.

13. This site could also provide the perfect opportunity for a mixed-tenure development that would go some way towards delivering on the Housing Executive Targets (Technical Supplement 2, Housing, Table 9: NIHE Projected (5-Year) Social Housing Need 2023-2028), which project a need in the settlement of 22 units.
14. The area proposed for expansion is unaffected by present or future flood modelling.



C2. Did the Council take account of its Community Plan?

15. Newry, Mourne and Down District Council's Community Plan 2030 'Living Well Together' has a heavy focus on the provision of housing including the provision of high-quality family homes as well as a mix of tenures to support elderly and smaller households, providing social and affordable options.
16. The plan must consider the zoning of new areas of housing in existing settlements where access to infrastructure and need is clearly identified and evidenced over recent years. If the plan restricts the expansion of settlements to meet demand for new homes, it will be in direct conflict with the Community Plan.

Coherence and Effectiveness Tests

CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

17. The projection of the plan's target of 11,000 dwellings during the plan period (2020-2035) does not seem to consider the trend for under supply over recent years, a trend that would suggest a need to be less optimistic in projections. More realism is needed in looking at the expansion of settlements near large urban centres to aid in supply.

CE3. There are clear mechanisms for implementation and monitoring.

18. With an average of 446 Housing Units completions from 2020-23 and a requirement of 733 being needed to meet the 11,000 target it does not appear that the plan provides a clear direction in terms of dealing with this undersupply. The presentation of year Housing Monitor figures without a corrective action plan does not seem to have worked in the past and thought should be given to how this can be improved.

Conclusion and Summary

19. Recent trends for under supply of new housing units in the plan area illustrate the need to look creatively at how supply can be improved as opposed to stating it can be met through 'brownfield' development and projecting optimistically into the future.
20. Settlements near larger urban centres are a logical place to start in considering how supply can be sustainably enhanced, with connections to the water systems, public transport, regional road networks etc Newtowncloghoge provides a perfect opportunity to assist in delivering on housing supply and recent demand for development in the settlement shows this.
21. The zoning of land can also improve the settlement itself which has seen a number of enhancements during the previous planning period including a garage/post office, new playing pitches and planning approval for a new school. The plan should support and encourage these settlements to grow sustainably to enhance the lives of the people who live there, as well as for the benefit of the plan area.

Appendix 1