



# Draft Plan Strategy Representation Form

Please complete this representation form online and email to [ldp@nmandd.org](mailto: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	Henderson Group, PO Box 49, Hightown Avenue		
Town	Newtownabbey	Postcode	BT36 4RT

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.

## Section F | Type of Procedure

**Q5** Please indicate if you would like your representation to be dealt with by (*please select one item only*):

- ☐ **Written** (Choose this procedure to have your representation considered in written form only)
- ☒ **Oral Hearing** (Choose this procedure to present your representation orally at the public hearing)

Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

## Section G | Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner in understanding the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

## Sound

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

Section H | **Unsound**

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

**Q6** If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

**Development Plan Practice Note 6 Soundness ([infrastructure-ni.gov.uk](https://infrastructure-ni.gov.uk))**

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

**Note:**

*If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.*



## 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)** RET4 (& RET3 &5)

(and/or)

**Relevant Section/Page Number** Town Centres and Retailing, Page 240

(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.

Policy RET 4 proposes what is essentially a 200sqm gross external area floorspace cap for small scale convenience shops outside of town centres without any evidential basis for doing so. A 200sqm cap is not mentioned in Technical Supplement 4 (e.g. on page 42 where 'New Policy RET4' is considered), Appendix 4A Retail Study 2020 or Appendix 4B Retail Study 2022 Update. There is no justification given for identifying a specific figure and there is no justification given for it being 200sqm gross external area. As per our previous submission to the Council a SPAR would be 280-420sqm net retail floorspace whilst a EUROSPAR would be 510-600sqm net floorspace. The appropriate scale of floorspace can be assessed as is currently the case in the SPPS by way of need and impact tests. Indeed, Policy RET 3 establishes thresholds for when these are required. It is unclear why a shop should be limited to 200sqm gross external area under Policy RET 4 when RET 3 only requires impact and need to be assessed when a shop is 750sqm or 500sqm gross external area depending on its location, implying that shops below those thresholds are generally acceptable when it comes to impact and need.

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.

Policy RET 4 should be amended to read: 'Planning permission may be granted outside city and town centres, but within the settlement limit, for a convenience shop of an appropriate scale where it can be demonstrated that etc.'

This would be consistent with Policy RET 5 which makes provision for local neighbourhood shops subject to assessment of need and impact without any floorspace cap.

Alternatively RET 4 & RET 5 could be amalgamated into a single policy.

## 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?

No comments on Monitoring

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

Do you have any comments on the SA?

No comments on the SA.



## 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: