



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	Mr		
First Name	David	Last Name	McMaster
Address	12A Mahon Industrial Estate		
	Portadown		
	BT62 3EH		
Email	[REDACTED]		

Q3 Did you respond to the previous Preferred Options Paper?

- ☒ Yes ☐ No ☐ Unsure

Section B | Individuals (if different to Q2 above)

Address	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
Town	[REDACTED]	Postcode	[REDACTED]

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	CST Properties Ltd		
First Name		Last Name	
Address	76-78 Church Street,		
Town	Portadown,	Postcode	BT62 3EU

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) 3.3.1, HOU5, HOU6 , 4.1.2, 4.1.3

(and/or)

Relevant Section/Page Number P23-24, P36-38, P120-121, P214-218 Tech Supp 2

(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 is influenced by data provided in Technical Supplement 2 however the data is confusing in that it appears to include estimated figures including potential from unzoned land which has a significant degree of uncertainty. There is no consideration given to uncommitted zoned land which has no possibility of being developed within the foreseeable future and certain towns such as Newcastle and Warrenpoint are under specific pressure to have additional lands considered at this stage.

As HS1 is considered in conjunction with HS2 and HS3 the current approach is unsound.

Section 4.1.2 (P120) and section 4.1.3 (P121) looks at Social Aspects which are related to Policies HOU5 and HOU6. Unfortunately it would appear that there could be conflict between these policies and strategic social aims.

The proposal that EVERY site should have a minimum of 20% social or affordable allows for a site to be developed with 100% social, however this will not allow for the variety or social mix which is one of the aims of the plan.

The character of an area is also a material consideration. HOU5 if adopted with the 20% minimum could change the character of areas particularly where the plots are all large detached dwellings.

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.

The housing strategy needs to be reviewed to take into account current zoned land which locally is known to have no prospect of being developed at present. If this is not the case certain areas will come under pressure to achieve target housing and there is no current mechanism apparent to include additional lands to meet the shortfall.

Policies HOU5 and HOU6 need reviewed to ensure that an appropriate housing mix can be achieved. The requirement for social and affordable should be site specific where there is a known demand and should not be applied to all sites.

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?

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

Do you have any comments on the SA?

In order to achieve the objective of "Strengthen Society" there should be more consideration given to a number of policies which are contrary to this aim.

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: