

From: [LGPD Coordination](#)
To: [ldp](#)
Cc: [REDACTED]
Subject: FW: DfC response to Newry, Mourne and Down Publication of Local Development Plan draft Plan Strategy
Attachments: [Notification Re. NMDDC Publication of Local Development Plan draft Plan Strategy 2035.pdf](#); [Newry, Mourne and Down District Council LDP - Housing input.DOCX](#);
Sent: 19/09/2025 15:46:39

Apologies- please note additional comment added to original email below (red font).

Thank you,
[REDACTED]

From: LGPD Coordination
Sent: 19 September 2025 15:35
To: 'ldp@nmandd.org' <ldp@nmandd.org>
Cc: [REDACTED]
Subject: DfC response to Newry, Mourne and Down Publication of Local Development Plan draft Plan Strategy

Hello,

Thank you for the opportunity to comment on NMD's Local Development Plan 2035 consultation.

Please find attached comments from DfC's Housing Team. They add that *"We have no specific comments in relation to travellers and note that the Housing Executive, who are responsible for traveller accommodation, are a statutory consultee for LDPs."*

Reference is made to the [Supplementary Planning Guidance June 2025](#) document.

This return is being made by email, an option mentioned on [Draft Plan Strategy](#), instead of using the online form option.

Grateful if you could confirm that this is acceptable and acknowledge receipt.

Regards,
[REDACTED]

[REDACTED] | Community Planning & Central/Local Government Relations Branch | Department for Communities
 Level 4 | Causeway Exchange | 1-7 Bedford Street | Belfast | BT2 7EG
 Contact: [REDACTED] | Tel: (02890) 544035 | DD: [REDACTED]

Supporting people, Building communities, Shaping places

From: [REDACTED]
Sent: 27 June 2025 09:26
Cc: [REDACTED]
Subject: FW: Notification of NMD Publication of Local Development Plan draft Plan Strategy

Good morning Partners

Please find attached correspondence re: **Publication of Local Development Plan draft Plan Strategy 2035**.

Any queries please contact LDP directly on ldp@nmandd.org

Thank you
[REDACTED]

Partner Development Officer

Oifig Dhún Pádraig

Downpatrick Office

Downshire Civic Centre
Downshire Estate, Ardglass Road
Downpatrick, BT30 6GQ

Working from home: Contact via Teams
Council: 0330 137 4000
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www.newrymournedown.org
www.facebook.com/nmdcouncil
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Newry, Mourne and Down District Council LDP
(SUPPLEMENTARY PLANNING GUIDANCE-
supplementary planning guidance(1).pdf) - Housing Input

ARB COMMENTS:

Page 20 - Affordable (Intermediate) housing for rent

Suggest that this sentence ends at "total income". The eligibility criteria are linked to household net income thresholds.

As a rule of thumb, to be considered 'affordable' a household should not normally pay in excess of 30% of its income on rental costs. This is not, however, an eligibility criterion.

Page 20 - Subsidised Intermediate Rent

The preferred terminology is 'Funded Intermediate Rent' rather than 'subsidised Intermediate Rent'

Page 21 - The DfC Intermediate Rent policy does not establish rent controls, the policy outlines rent uprating arrangements.

Page 21 - The policy does not reference a minimum tenancy term, tenants should be offered a 5 year tenancy but may opt for a shorter term if they wish.

Page 21 - Discounted Market Rent(DMR)

The terminology for intermediate rent housing for rent which is not funded by DfC is non-funded or delivered without DfC funding.

The term Discounted Market Rent has a different meaning in its application to housing products in other jurisdictions and its use here in relation to intermediate housing for rent is likely to lead to confusion.

The funding which will be provided by DfC to the Intermediate Rent Operator has not been defined as a subsidy. The preferred terminology here would be Funded Intermediate Rent.

PAGE 179 - Policy HOU5 Affordable Housing

The Department has published separate design standards for Intermediate Rent available at the following link <https://www.communities-ni.gov.uk/articles/intermediate-rent#toc-1>

The criteria listed would preclude delivery of intermediate housing for rent in open space delivered with or without government funding as the delivery organisation will not meet criteria ii.

Page 180 - This description may be confusing. In order to be eligible to apply for an Intermediate Rent tenancy, the household's net income must be within the published limits (£30k net for single adult/£40k net for 2 adults+).

Page 180 - Separately, an Intermediate Rent tenant should not normally pay more than 30% of their household income on their rental costs.

Page 180 - It might be optimal to limit the text in this paragraph to reflect that "This is based on the household's net income."

Page 180 - Under the law, Intermediate housing for rent may not be delivered by RHAs within NI, Council may wish to revise this text accordingly.

Page 181 - Affordable housing includes intermediate housing for rent, however this will not be brought forward by NIHE or RHAs, Council may wish to consider extending this provision relating to open space to organisations planning to deliver intermediate housing for rent which would include the DfC funded Intermediate Rent operator and other non-funded organisations

Page 182 -Policy HOU6 Housing type, Size and tenure

Under the law RHAs cannot deliver intermediate housing for rent in NI, council may wish to revise text to include organisations which intend to deliver intermediate housing for Rent

Page 183 – Policy HOU7 Adaptable and Accessible homes

The preferred terminology is 'Funded Intermediate Rent' rather than subsidised Intermediate Rent'. The funding has not been classified as a subsidy at this stage.

Page 183 - this design standard would apply to social housing and intermediate housing for rent.

Page 190 – Policy COU3 – Affordable Housing in the Countryside

DfC has progressed the development of a funding package. Council may wish to update text to reflect that the Department is planning to make available Financial Transaction Capital loan funding to support delivery of Intermediate Rent homes. Following an open competition for funding, the Department will work with Maple & May Ltd who will act as Intermediate Rent Operator to deliver 300 new Intermediate Rent homes across Northern Ireland over the coming years.

DfC would also welcome provision of self-funded intermediate rent housing

Page 190 - the term "social and affordable housing" is used throughout the document. social housing is a form of affordable housing, so the appropriate term would be either "affordable housing" or "social and intermediate housing"

Page 190 - Under the law, Intermediate housing for rent may not be delivered by a RHA within Northern Ireland. Council may wish to revise this text to include organisations wishing to deliver intermediate housing for rent

Page 205 - Policy OS1 protection of open space - Council may wish to consider permitting extending this exception to organisations delivering intermediate housing for rent.

Page 205 - Under the law, Intermediate housing for rent can not be delivered by a RHA, council may wish to consider making provision for organisations who wish to deliver this form of affordable housing.

Page 390 Glossary - The delivery of affordable housing will, in the near future include the delivery of intermediate housing for rent by the DfC funded Intermediate Rent Operator and potentially by non-funded organisations as a result of affordable housing requirements in LDPs. These organisations will not be Registered Housing Associations.

HSU COMMENTS:

On page 18 and 19 guidance [supplementary planning guidance\(1\).pdf](#) there is a section regarding affordable housing. Rent To Own is mentioned but this has now been closed to new applicants and should be removed. Fairshare is also mentioned which is no longer in operation and should be removed.

Please amend as below:-

Affordable (Intermediate) Housing for Sale

At present, shared ownership products available in Northern Ireland are available:-

~~These are currently~~ through:-

- Co-ownership Housing Association;~~and~~•
- ~~Fairshare~~.

Co-Ownership: Co-Ownership Housing Association products are as follows:

Co-Own: A form of equity sharing whereby purchasers select a property on the open market and, by means of a 99-year equity sharing lease, takes ownership of between 50% and 90% of the purchase price, depending on how much they can afford. They then pay rent on the unowned portion, which is purchased by the Co[1]Ownership Housing Association. The expectation is that, over time, shared owners will buy a greater share of the home (sometimes referred to as 'stair-casing'), until they own the whole property.

Co-Own for Over 55s: A new product designed for those in later life who wish to move to another home. The challenge that such people may face is that often their current home may not have the value (equity) they need to buy a new home, or their savings aren't enough and getting a mortgage to cover the difference isn't an option. Under Co-Own for Over 55s, that we buy the property together with the customer –the customer uses the equity from the sale of their current home or savings and Co-Ownership provides the rest of the funding. The customer takes a share in the property (50% to 90%) and pays a rent of 2.5% of our investment in the home. The home can be anywhere, an existing or a new build property, and it should be suitable for their needs now without further immediate adaptation.

Rent to own:

~~Aims to help those who want to own their own home but are not quite in the position to buy yet, onto the property ladder. Under the scheme, an individual is provided with a fixed-term rental commitment whilst they take steps to improve their mortgagability. During the rental period, the individual will either pay reduced rents, allowing them to save for a deposit, or will receive a proportion of the market rent paid back at the end to be used as a deposit if they avail of the option to buy the home (either through straight sale or shared ownership). ‘Rent to Own’ is operated by OwnCo Homes Limited, which is subsidiary of Co[1]Ownership H.A. This is only available for the rental of new build homes and the option to buy can be exercised any time after the end of the first year, up to the end of the third year~~

PRS COMMENTS:

We have no specific comments in relation to travellers and note that the Housing Executive, who are responsible for traveller accommodation, are a statutory consultee for LDPs.