



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			
First Name	Seamus	Last Name	Fay
Address	11 Loughinisland Road		
	Loughinisland		
	Downpatrick		
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			
Town		Postcode	

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.

No - see supporting submission

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:

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.

Development Plan Practice Note 6 Soundness (infrastructure-ni.gov.uk)

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)

(and/or)

Relevant Section/Page Number

(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.

See attached submission

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.

See attached submission

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?

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:

NEWRY MOURNE & DOWN LOCAL DEVELOPMENT PLAN 2035

Representations to Draft Plan Strategy Lands East of Carrigvale Dundrum





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1. INTRODUCTION

- 1.1 This representation has been prepared by Fay Planning Consultancy on behalf of our client, in response to the consultation in respect of the Newry Mourne & Down District Council (*'the Council'*) Local Development Plan 2035 Draft Plan Strategy (*'DPS'*) issued on 27th June 2025.
- 1.2 This representation relates to the growth strategy, the proposed settlement hierarchy, and the distribution of housing land within that hierarchy.
- 1.3 It relates to land that is not currently zoned under the Ards & Down Area Plan 2015 and responds to the relevant strategy and policy considerations set out in the DPS with particular regard to the site-specific interests.
- 1.4 The consideration of the Council proposals and the preparation of this response to that proposal has taken account of relevant background documents that are material to the consideration of this matter.
- 1.5 For the reasons set out below, it our considered view that the DPS is unsound as the it fails the soundness tests in respect of:
 - Consistency Test C1 – failure to take account of the Regional Development Strategy
 - Consistency Test C3 - failure to take account of policy and guidance issued by the Department
 - Coherence & Effectiveness Test CE2 - failure to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

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2.0 DUNDRUM IN THE SETTLEMENT HIERARCHY

Strategic Designation SETT1 Settlement Hierarchy

- 2.1 The DPS proposes to designate Dundrum as a village under Strategic Designation SETT1 and states that the designation is based on a full evaluation of all settlements as set out in Technical Supplement 1 - Settlement Hierarchy and Strategic Settlement Evaluation, which takes into account the RDS Regional Spatial Framework, including the six tests of the Housing Evaluation Framework (Resources, Environmental Capacity, Transport, Economic Development, Urban/Rural Character, Community Services), the Hierarchy of Settlements and Related Infrastructure Wheel, census data, the existing development plans, together with the information detailed within the NISRA document 'Classification and Delineation of Settlements'.
- 2.2 It is our considered view that the proposal is not consistent with the RDS Regional Spatial Framework, the Hierarchy of Settlements and Related Infrastructure Wheel, and the NISRA document 'Classification and Delineation of Settlements'.

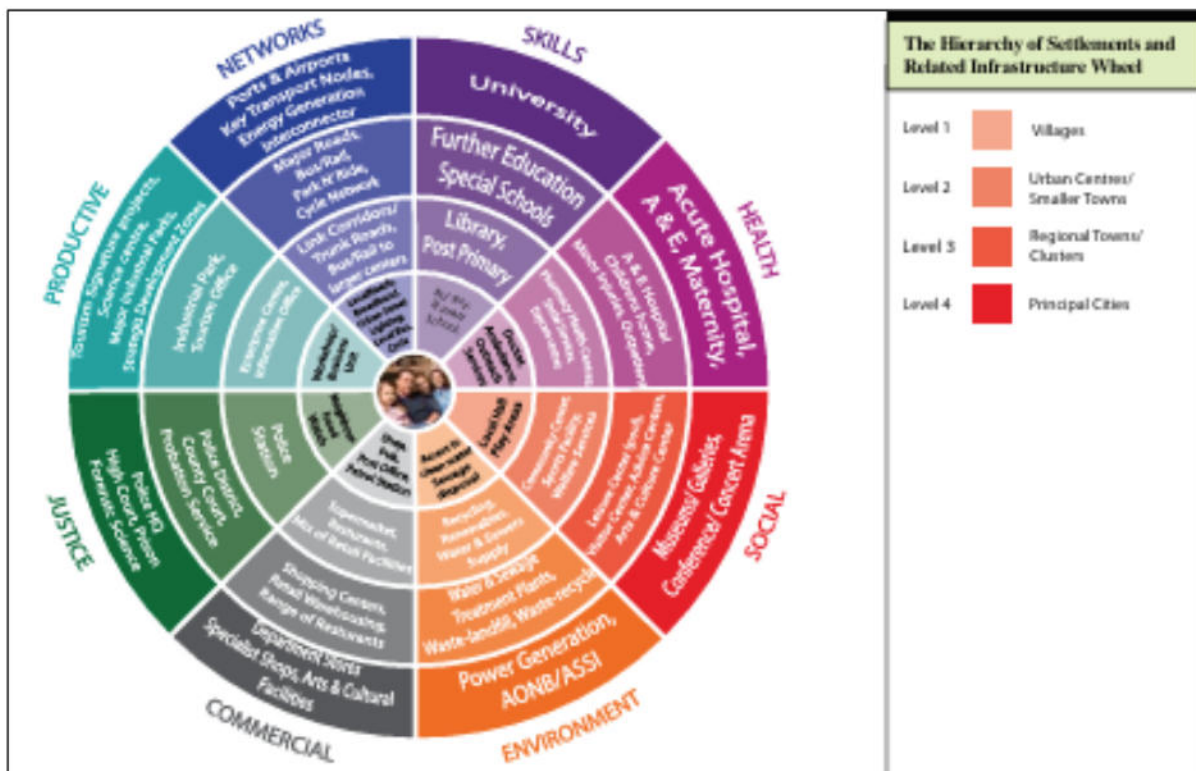


Figure 1: RDS Hierarchy of Settlements and Related Infrastructure Wheel

- 2.3 We support the key aim of the LDP in seeking to define a spatial growth strategy that supports the development and regeneration of the area socially, economically and environmentally.
- 2.4 We welcome the recognition that the RDS provides a hierarchy of settlements and related infrastructure wheel (Figure 1), which outlines the patterns of service provision that are likely to be appropriate at different spatial levels including villages, smaller towns, regional towns and principal cities. The model recognises the strong relationship between settlement size and the level of service that can be supported, which is a key consideration in establishing a settlement hierarchy.

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- 2.5 The RDS Hierarchy of Settlements and Related Infrastructure Wheel provides direction on the range of public and private services needed to ensure citizens have access to the necessary economic, social and cultural opportunities, as well as the infrastructure required by businesses to build a competitive dynamic and innovative economy. These services include transport and communication networks, education, health, social, environment, commercial and justice. The wheel outlines the patterns of service provision that are likely to be appropriate at different spatial levels in the settlement hierarchy. The model recognises the strong relationship between settlement size and the levels of service that can be supported. The wheel provides a forward perspective, providing some understanding of the level of facilities and services anticipated at different spatial levels rather than necessarily reflecting the stock of services that are currently available in villages, towns, cities or regionally (emphasis added).
- 2.6 The Council detailed analysis of each settlement and its position in the settlement hierarchy is set out in Appendix 7B Strategic Settlement Appraisals. The assessment of Dundrum confirms that: *“When considered against the Regional Development Strategy 2035 diagram 2.2 Dundrum meets the majority of the criteria in Level 1 (village) and some of the level 2 (small town) requirements.”*

Infrastructure Group	Tier 2 – Local & Small Towns	Commentary
Skills	Library, Post Primary	Sacred Heart PS Nursery School Knockevin Special School
Health	Pharmacy, Health Centre, Social Services, Day Care Centre	GP practice & health centre in Church View Pharmacy T-GEM Healthcare
Social	Community Centre, Sport Facilities, Welfare Services	3 Churches Community Halls – Orange Hall & Church Hall Dundrum Utd FC Dundrum Cricket Club Dundrum Angling Club Murlough Athletic Club Dundrum GAC Dundrum Coastal Rowing Club Dundrum Development Association Dundrum Youth Club Dundrum Summer Festival
Environment	Recycling, Renewables, Water & Sewer Supply	WwTW has capacity for 10% growth (2023). Clothes & other recycling bins in car park.
Commercial	Supermarkets, Restaurants, Mix of Retail Facilities	1 no. petrol filling station & supermarket; 6 restaurants 3 public houses Car mechanic

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		Tyre sales & service Offices – major construction company; healthcare provider; architects practice Picture framing Hair salon Beauty salon
Justice	Police	PSNI station closed – in line with practice in many local towns across the region.
Productive	Enterprise Centre, Information Office	Mini commercial/industrial park – separate car mechanics; tyre services HQ of major construction company (Dunmore)
Networks	Link Corridors, Trunk Roads, Bus/Rail to Larger Centres	Strategic location on Link Corridor in RDS – A2 providing connections to Downpatrick, Newcastle, Newry and Belfast. Main bus route to/from Belfast, as well as connection to bus station in Ballynahinch

Table 1: Settlement Hierarchy Local & Small Towns Infrastructure Parameters

- 2.7 Figure 1 above is adapted from the DPS Table 4 which sets out the Settlement Hierarchy Tiers and the relevant infrastructure provision associated with each level. It is clear that Dundrum does demonstrate significant compliance with the tier 2 (small town) criteria as set out in the RDS.
- 2.8 The RDS Spatial Framework sets the context for determining future development priorities. The role of settlements located on key transport corridors and link corridors is a significant consideration in assessing the growth potential of a settlement as enhanced accessibility between the critical mass together with the settlement own services/employment/residential offer reduces the need to travel, encourages sustainable movement choices, makes efficient use of infrastructure and resources, as well as successfully and sustainably integrating new employment and residential development uses, all of which are aspirations within the RDS. The location of Dundrum, as a settlement along a link corridor, provides it with an advantage in terms of its role and its growth potential, which embodies the ‘*forward perspective*’ envisaged by the RDS.
- 2.9 Further, Dundrum is well-positioned geographically between Newcastle, Clough and Maghera and has close working links with all three. The RDS notes that there is no reason why towns, other than those identified in the Spatial Framework, cannot cluster and work together in this manner to strengthen the overall quality and extent of services, facilities and opportunities for the critical mass.
- 2.10 The proposal to designate Dundrum as a village rather than a small town is contrary to the RDS provisions and it is therefore unsound in the following respects:
- Procedural Test P2 – it fails to take proper account of representations made to the Preferred Options Paper

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- Consistency Test C1 – it fails to take proper account of the Regional Development Strategy
- Coherence & Effectiveness Test CE2 – it fails to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular its own evidence base.

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3.0 DPS HOUSING STRATEGY

Strategic Policy HS1 Housing Land Allocation

- 3.1 The LDP has a key role to play in promoting and facilitating sustainable housing through the zoning of land and the provision of planning policy to support the provision of quality living environments and affordable housing.
- 3.2 The RDS provides guidance for achieving sustainable patterns of residential development, to meet the needs of the whole community, and highlights the importance of housing as a key driver of physical economic and social change in urban and rural areas. It promotes more sustainable housing development within existing areas and seeks to ensure an adequate and available supply of quality housing to meet the needs of everyone.
- 3.3 The DPS follows the process set out in the SPPS for allocating housing land, taking account of the following:
 - RDS Housing Growth Indicators (HGLs)
 - RDS Housing Evaluation Framework
 - Allowance for existing housing commitments
 - Urban Capacity Studies
 - Allowance for windfall housing
 - Sequential Approach & identification of suitable sites for settlements > 5000 population
 - Transport Assessments
- 3.4 The SPPS regional strategic objectives for housing in settlements are to:
 - Manage housing growth to achieve sustainable patterns of residential development
 - Support urban and rural renaissance
 - Strengthen community cohesion.
- 3.5 The DPS raises the current issues around Wastewater Treatment Works (WWTW) capacity and the capacity of network feeding into the WWTW which have been flagged by NI water for a range of settlements across the district. It is recognised that this is ongoing issue with NI Water continuing to review their network capacity and roll out upgrading works to address work programme priorities. However, the DPS states that: *'At this stage it was considered premature to rule out sites due to capacity issues, consultation will be undertaken with NI Water at the Local Policies Plan, and this will further inform whether the development of certain sites should be ruled out.'* This is not a sustainable approach as the difficulties are very real and very present. NI Water recently announced that they are 'mothballing' its flagship Living With Water Programme and confirmed that there is currently insufficient funding available to deliver any of the Major Projects included within the Living With Water Plan for Belfast, including Belfast WwTW Phase 1, Sydenham WwPS, Kinnegar WwTW, Whitehouse WwTW and Extension of the Belfast Storm Water Tunnel. This reflects a funding crisis in NI Water's capacity to deliver upgrades to their critical infrastructure. It is a situation that cannot be ignored and should be taken into account now in the allocations to settlements. In April 2023, NI Water confirmed that they have lifted the development constraint on Dundrum:

"We are pleased to confirm that we have recently received an updated Water Order Consent from our Environmental Regulator – the Northern Ireland Environment Agency (NIEA). This has enabled us to lift the development constraint which relates specifically to the Wastewater

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Treatment Works; therefore, it is not currently envisaged that additional capital investment will be required at the WwTW. However, the constraints within the sewer network in Dundrum will remain until the upgrade of two key Wastewater Pumping Stations in the village; Flynn's and Keilty's WwPS have been completed. These projects will address two Combined Sewer Overflows which are classified as Unsatisfactory Intermittent Discharges by NIEA. Once complete, these upgrades will reduce the likelihood of out of sewer flooding and spills to the environment. Our engineering team is finalising the designs for the upgraded pumping stations, which are currently programmed to be completed in Spring 2025, subject to all statutory approvals being in place, and a successful land acquisition outcome. Over the shorter term, the lifting of the development restriction on our WwTW will allow our Solutions Engineering Team to work with developers to identify opportunities for alternative drainage solutions where possible i.e., stormwater off setting. This innovative approach may facilitate development ahead of the delivery of the sewerage infrastructure investment. However, any such solutions would be developer led and funded."

- 3.6 The settlement strategy proposes that three of the small towns should be uplifted from villages and the intention is to support the growth of these new towns in accordance with their uplifted designation. As set out in section 2 of this submission, it is our strongly held view that Dundrum should also be uplifted in status to a small town and the housing allocation should be increased to reflect that position. The subject lands under the ownership and control of our clients (see Appendix 1) would be an appropriate location for further sensitive growth of Dundrum at a scale and character appropriate to its size and location.
- 3.8 Without prejudice to its position in the settlement hierarchy, Dundrum as a settlement is, in any event, well placed to deliver an increased allocation of housing to meet the RDS and LDP objectives. Under the consideration of 'Transport Assessment' the DPS confirms that the aim is to focus new development where it is most accessible, directed through the provisions within the strategic policy on Sustainability and Climate Change and a range of operational policies.
- 3.9 The NIHE Strategic Housing Market Analysis (SHMA) summary report, published in June 2022, sets out new dwelling requirements in a medium growth requirement for the district (10,630) alongside a high growth requirement (11,420). Unlike the HGIs, the new dwelling requirement set out in the SHMAs includes a backlog component which is the level of existing unmet need and is the shortfall between current provision and the accommodation needs of existing households or families not yet formed as separate households. The DPS adopts a position that the application of the 10% flexibility allowance would 'contribute to meeting the NIHE overall medium growth requirement.' The DPS concedes that deliverability of affordable housing will depend to a large degree on zoned sites still to be developed, alongside windfall sites outside of these zonings and the extent to which these come forward over the Plan period. Further to that, the NIHE Housing Investment Plan (HIP) as updated in 2024 confirms a social housing need for 2,234 units in the district. There is a high need identified between Dundrum Clough & Seaforde with 32 units required for the period 2023-2028. This higher, pressing need should be factored into the housing allocation for the settlement. If we are to assume that the social housing need is to be split evenly between the three settlements, the allocation of 7 units of housing in total is insufficient to meet even the social housing need.
- 3.10 The Newry Mourne and Down Housing Availability Report of 2023 confirmed that there are only 2 remaining units available on committed sites in Dundrum settlement. The allocation indicated in Table 7: HS1 Indicative Housing Land Allocation 2020-2025 represents just 0.0034% ($\frac{1}{290}$) of the total allocation to 23 villages in the proposed settlement hierarchy. While we recommend an approach that evaluates the circumstances of each settlement rather than

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applying a crude sharing of the overall allocation evenly across all settlements in that particular band of the hierarchy, the allocation to Dundrum is wildly disproportionate when compared to other settlement proposed as villages. It is remarkable in a context where the 3.78 hectares of land zoned for housing under the ADAP 2015 (HPA1 & HPA2) in a Plan adopted in March 2009 were both completely built out by May 2009 as confirmed by the historic Google Earth Image in Figure 1 below.



Figure 2: Google Earth Historic Image of Lands Zoned Under HPA 1 & HPA 2 - May 2009.

3.11 Sacred Heart Primary School is working hard to maintain enrolment at a level that will ensure its longer-term sustainability.

School Year	Year 1 Intake	Year 7 Departures	Total Enrolment
2020/2021	20	17	109
2021/2022	16	8	113
2022/2023	15	18	121
2023/2024	14	13	122
2024/2025	18	21	129

Table 2: Sacred Heart PS Enrolment Numbers 2020-2025 (source: <https://www.education-ni.gov.uk/publications/school-enrolment-school-level-data>)

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- 3.12 The Department of Education's Sustainable Schools policy states that primary schools should have at least 140 pupils in urban areas and 105 in rural areas to be sustainable. Sacred Heart Primary School needs to at least maintain current enrolment numbers to avoid being at risk of closure which would be contrary to the objectives of the RDS and the Strategic Planning Policy Statement (SPPS).
- 3.13 A Queen's University Study¹ on the relationships between small rural primary schools and their communities in Northern Ireland drew the following conclusions:
- Small rural schools are also perceived to have similar strengths, most common being their strong relationship with the community, the low pupil-to-teacher ratio (ideal to meet children's individual needs), and the family-like environment where everybody knows and supports each other.
 - Small rural schools are a big part of their rural communities. Some are perceived to be 'at the heart of the community'. This can mean different things depending on the school, but they often are a 'meeting point' where people come together. Schools organise community events, share resources with different groups, and contribute to the economy of the area, among many other things.
 - The relationship between the school and the community was found to be a powerful, mutual, dynamic relationship, the intricacies of which depended on the historic, social and geographic context of the school itself. Bringing children to, working in, and attending the school were perceived as reinforcing a sense of belonging and pride to be part of that community.
 - Interviewees in the case study schools were dismayed at the prospect of losing the school, arguing that it would be the break-up/end of the community if that happened.
- 3.14 Providing a modest provision for new housing in the Dundrum, of a scale that does not diminish the overall objective of the RDS settlement hierarchy and thereby sustain rural communities and critical services, including education, would be fully aligned with the RDS and SPPS strategic objectives.
- 3.15 For the reasons outlined above, a targeted approach is necessary to ensure the allocation of housing over the next 15 years – one that reflects the strengths of individual settlements, and their capacity to deliver a flexible response to meeting the identified housing need.
- 3.16 While the subject lands currently lie out-with but adjacent to Dundrum Settlement Limit, as identified in the Ards and Down Area Plan 2015, they lie adjacent to a well-established residential area in Carrigvale to the west and with Murlough View immediately to the south. Access can be readily provided through Carrigvale and Castle Hill.
- 3.17 The subject lands represent a natural rounding off and infilling of the existing development, aligned with the settlement limit boundary, at Castle Hill. It is acknowledged that development should be restricted to the lower slopes and which will ensure that the development would have no impact on the setting of Dundrum Castle as it would not be possible to view any such development from that asset.

¹ Bagley, C., & Fargas, M. (2025). Hollowing out communities: small rural schools in Northern Ireland and the threat of closure. In J. D. Johnson, & H. L. Harmon (Eds.), *Handbook on Rural and Remote Education* (pp. 461–474). Elgar. <https://doi.org/10.4337/9781035307722.00040>

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3.10 In that context increased provision at Dundrum on the subject lands would assist in meeting the LDP objectives in that:

- It would open up capacity to provide for a proportionate mix of housing type, size and tenure in an accessible location with good transport links to other key towns in the district as well as having strong public transport connections with those towns and the city of Belfast.
- An appropriate allocation close to existing residential areas within the settlement would provide for the need of growing families, elderly and disabled by accommodating development which allows people to remain within their communities and maintain their existing connections, while still enabling relatively independent living.
- It would promote integration between transportation and new development to reduce the need to travel and reduce dependency upon travel by car.
- It would provide opportunities for sustainable travel including walking, cycling and public transport and reduce the need to travel by private car.

3.11 The approach to the proposed allocation, while in broad terms following the approach of the RDS and SPPS, does not take appropriate account of the situation at each settlement with regard to their scale, location in respect of other settlements and main transport corridors, current and future role, both individually and as part of potential clusters, and environmental considerations. The allocation proposed for Dundrum is wildly inadequate and doesn't reflect the role that the settlement can play in delivering on the RDS and LDP objectives due to its particular location and relationship with the wider district and beyond. In that context the proposal is unsound in the following respects:

- Consistency Test C1 – failure to take account of the Regional Development Strategy
- Consistency Test C3 - failure to take account of policy and guidance issued by the Department
- Coherence & Effectiveness Test CE2 - failure to develop strategies, policies and allocations that are realistic and appropriate having considered the relevant alternatives and in particular are not founded on a robust evidence base.

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4.0 CONCLUSIONS

- 4.1 The proposal to retain Dundrum as a village rather than a small town is unsound as this settlement compares favourably in respect of service provision and capacity for growth to the three settlements proposed for uplift. Dundrum should be re-designated as a small town and granted an uplift in housing allocation to reflect that position.
- 4.2 It is important that additional homes are provided in settlements that are well connected to the strategic network, while at the same time providing opportunities for local working and education.
- 4.3 There is an identified social housing need in Dundrum, Clough and Seaforde. The proposed housing lands at Dundrum would round off the settlement with housing that responds to identified local need and integrates well with the existing settlement pattern. Our clients' lands provide the opportunity to do that.
- 4.4 We respectfully request that the Council re-consider this proposal, taking account of the concerns raised in this submission.
- 4.5 Our clients request that they are included in any inquiry process to discuss these matters further.



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APPENDIX 1: SUBJECT LANDS

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ACEmap® Single

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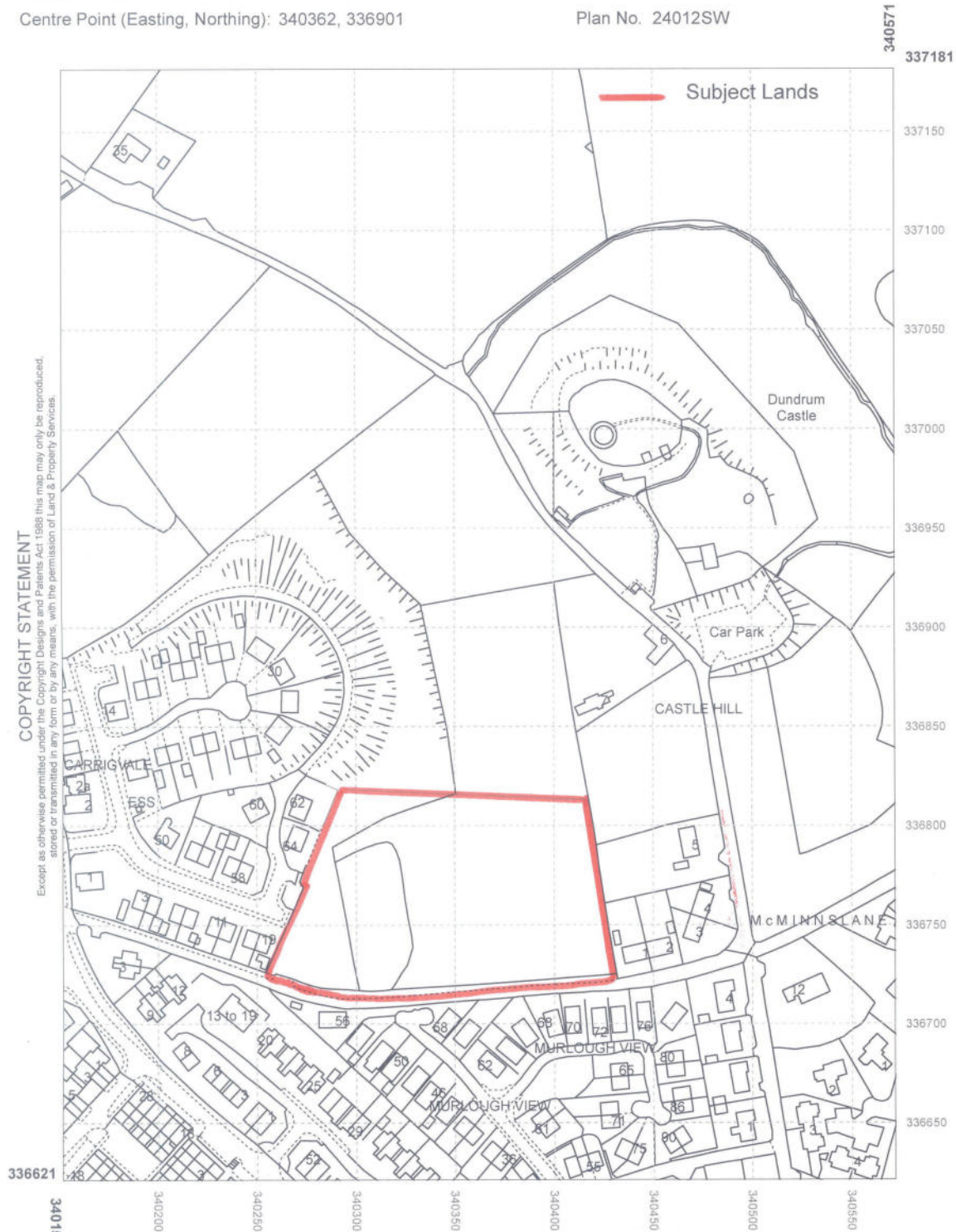
Centre Point (Easting, Northing): 340362, 336901

Scale: 1:2,500

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Plan No. 24012SW

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