



# 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

[REDACTED]

First Name

[REDACTED]

Last Name

[REDACTED]

Address

4a Quay street

Bangor. BT20 5ED

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

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	Formative Architects Ltd	
Your Job Title / Position	Director	
Organisation / Group Address (if different to above)	As above	
Address		
Town	Bangor	Postcode
	BT20 5ED	

## 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.

We support the Draft Housing Strategy objectives (HS1–HS3) and the Council's recognition of the importance of housing delivery, affordability and quality standards. However, we consider the policies too restrictive in relation to social housing numbers in small settlements, and insufficiently flexible to encourage innovative, sustainable models such as co-housing and certified Passive House development. We are also pleased that Planners addressed the failure of PPS21 to include community led housing schemes, common in most parts of the UK & Ireland but lacking in NI

More detail on the type & credentials of housing organization / charity should be specified

## 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 \(infrastructure-ni.gov.uk\)](http://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)	COU3
(and/or)	
Relevant Section/Page Number	189
(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.

The policy currently worded forces a choice between either community housing & not for profit & social, these are two different markets & serve two different group profiles.

Only one limit of 20 houses is permitted, it takes no guidance from the NIHE need or different demographics

COU3 Affordable Housing in the Countryside (p.189)

Housing in Settlements (HOU1–HOU9)

The housing policies are not fully realistic and appropriate to meet evidenced social housing needs (NIHE data for Strangford for instance shows higher need than the current cap).

The plan lacks reasonable flexibility to enable innovative models such as co-housing, charities and co-operative housing, Passive House or super low energy housing in rural areas.

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.

There should be a mechanism for each settlement to apply for both social & affordable, not either or both. In Strangford and similar small settlements, NIHE has established a need of c.27 social dwellings, the policy restricts this to a maximum of 14, leaving an unmet need. There are now many second homes & Air B&B's, these have priced out local moderate wage workers who need houses, the policy forces NIHE to choose between low cost housing and social housing.

The shortfall in affordable and social provision, contrary to the Plan's own objectives and equality duties (EQIA, Section 75). Social & affordable have different group requirements.

Co-housing organizations provide a model of affordability that discourages speculative resale, ensuring long-term affordability — this is not currently supported in policy.

Passive House (or better) construction should be encouraged in rural areas as it directly delivers climate and energy targets, yet the Plan has no clear mechanism to facilitate certified sustainable housing outside existing limits.

Amend COU3 and HOU policies to allow a higher quantum of social/affordable housing in small settlements where a demonstrated NIHE need exists.

Introduce policy support for co-housing models that ensure long-term affordability through re-sale restrictions for affordable housing.

Add a countryside housing provision that permits housing where the applicant can demonstrate certification to the Passive House Standard or higher, in line with Council's climate change objectives.

## 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?

The Council should commit to monitoring NIHE social housing need against delivery in each settlement. There should be flexibility to adjust caps where unmet need persists.

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

Do you have any comments on the SA?

We support the Plan's sustainability objectives, but note that failure to provide adequate social housing in rural settlements will undermine the SA outcome relating to social equity and community wellbeing.

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:

We consider the Draft Plan risks indirect discrimination if restrictive housing caps prevent vulnerable from accessing social housing in settlements with established need (e.g. Strangford). Allowing larger schemes where NIHE need is evidenced would strengthen equality of opportunity.

## 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:

The Draft Plan Strategy should recognise that rural communities often face higher fuel poverty and energy cost burdens due to older housing stock, off-grid heating, and limited energy infrastructure.

Introduce a rural housing policy mechanism that allows Passive House–certified schemes (including private housing and social housing models) to come forward where they can demonstrate measurable energy efficiency, affordability, and long-term benefits to the rural community.