



# 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 [REDACTED]

[REDACTED]

[REDACTED]

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		
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*)

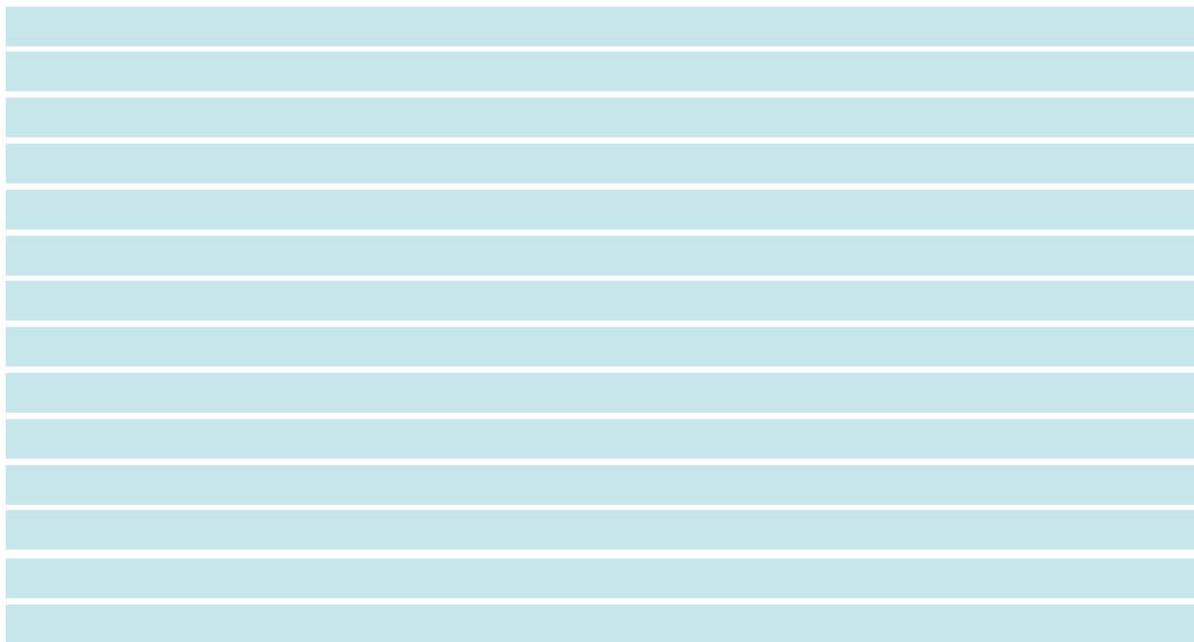
Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as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



## 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)	Strategic Policy HS1
(and/or)	
Relevant Section/Page Number	Section 5/Page 83
(and/or)	
Proposals Map	Not applicable

## 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.

An 'indicative' allocation of 80 residential units is given to Camlough village in Strategic Policy HS1. The term 'indicative' implies it could be more or less as it is only an indication of the whole numbers to be allocated. The policy states the Council will support the development of land for housing in accordance the allocation in Table 7. If more than 80 units come forward does this mean that the eighty-first units in not in accordance with policy HS1? The supporting Technical Summary 2: Housing provides the basis for the 'indicative' number. Of the 41 uncommitted units a density of 25 to 30 units per hectare is assumed. Strategic policy SP2 describes 'density appropriate to their surroundings'. No density bands are established in the settlement hierarchy for each tier in the draft Strategy or SPG. A much lower density of development is likely to be consistent with the character of the village. More development has also taken place in the village than the 3 units identified up to 2023. The remaining committed allocation therefore likely to be much smaller. There are only 9 villages in South Armagh and Camlough is a gateway to the Slieve Gullion AONB. A disproportionate amount of growth in this tier of settlement is being allocated to the Down part of the District. There should be balanced approach to the allocation of housing in villages to consolidate their role in serving a rural hinterland. The allocation for villages of 16% appears low when compared with the open countryside. It is more sustainable to facilitate growth in settlements. There is little capacity in Camlough for growth and this is reflected in a small allocation compared to similar sized villages. This is not an appropriate or realistic allocation. Test CE2 is not met.

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.

Such a prescriptive allocation is premature until the outcome of the settlement appraisal process at the LPP stage is understood. Designation SETT2 limits growth in this tier of settlement in a period of transition. More evidence is required to identify those settlements where future growth is anticipated. Camlough is served by good infrastructure and a hub for the surrounding rural hinterland extending into South Armagh. Providing access to housing here is more sustainable than locating it in the open countryside. A higher allocation is required for this village and the other small number of villages in South Armagh.

## 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?

None

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

Do you have any comments on the SA?

None

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: