

## Consistency with Prepared Options Paper

### Preferred Options Paper

**Key Issue 2** of the Newry, Mourne and Down Local Development Plan 2030 Preferred Options Paper addresses the distribution of housing growth across the district. The central challenge is how to allocate future housing in a way that supports sustainable development, protects the environment, and meets the needs of both urban and rural communities.

The preferred option selected by the Council is **Option 3**, which proposes a balanced approach to housing distribution. This option allocates approximately 62% of new housing to urban areas, 17% to villages and small settlements, and 21% to the countryside. It reflects a strategic effort to concentrate growth where infrastructure and services already exist, while still allowing for appropriate development in rural areas to support local communities and maintain their vitality.

This option is considered sustainable because it avoids overdevelopment in the countryside, which could strain resources and damage the natural environment, while also preventing excessive urban sprawl. It supports compact urban growth, encourages the use of existing infrastructure, and aligns with broader regional planning goals.

**Key Issue 3** of the Newry, Mourne and Down Local Development Plan 2030 Preferred Options Paper addresses the distribution of housing growth across the district. The central challenge is how to allocate new housing in a way that supports sustainable development, protects the environment, and meets the needs of both urban and rural communities.

The preferred option selected by the Council is **Option 3**, which proposes a balanced approach to housing distribution. This option allocates approximately 62% of new housing to urban areas, 17% to villages and small settlements, and 21% to the countryside. It reflects a strategic effort to concentrate growth where infrastructure and services already exist, while still allowing for appropriate development in rural areas to support local communities and maintain their vitality.

This approach is considered sustainable because it avoids overdevelopment in the countryside, reduces pressure on sensitive landscapes, and encourages compact urban growth that can be better served by public transport, utilities, and community facilities. It also aligns with regional planning guidance and environmental objectives, including climate resilience and biodiversity protection.

As a stakeholder, I found this option to be well-balanced and pragmatic. It addresses the district's housing needs without compromising environmental integrity or rural character. Given its thoughtful alignment with broader sustainability goals and its responsiveness to demographic trends, I did not feel further comment was necessary.

**Key Issue 5** of the Newry, Mourne and Down Local Development Plan 2030 Preferred Options Paper focuses on the allocation and management of employment land across the district. The issue arises from the need to ensure that there is sufficient and appropriately located land to support economic growth, attract investment, and provide opportunities for both large-scale and small-to-medium enterprises.

The preferred option, identified as **Option 2**, proposes a 20% uplift in the amount of employment land zoned for development. This increase is designed to address the limitations of the existing supply, which is heavily concentrated in sites controlled by Invest NI. While these sites are important for strategic investment, their restricted availability has created barriers for smaller businesses and local entrepreneurs seeking accessible and flexible premises.

By increasing the overall supply and diversifying the ownership and location of employment land, the Council aims to create a more inclusive and resilient economic base. This approach supports sustainable development by encouraging job creation closer to where people live, reducing commuting distances, and making better use of existing infrastructure. It also allows for a more balanced distribution of economic activity across urban and rural areas, helping to revitalise smaller settlements and reduce regional disparities.

As a stakeholder, I considered this option to be both balanced and forward-looking. It responds to current constraints while anticipating future demand, and it promotes a more equitable and sustainable economic landscape. Given its strategic rationale and alignment with broader planning objectives, I did not feel further comment was necessary.

**Key Issue 6** of the Newry, Mourne and Down Local Development Plan 2030 Preferred Options Paper addresses the distribution of housing growth across the district. The central challenge is to determine how best to allocate new housing in a way that supports sustainable development, meets population needs, and respects the character and capacity of both urban and rural areas.

### Draft Plan Strategy

The preferred option selected under this key issue is **Option 3**, which proposes a balanced, flexible, and sustainable approach to housing distribution. This option advocates for a strategic allocation of housing growth that prioritizes urban areas, particularly the two main hubs of Newry and Downpatrick, while still allowing for appropriate levels of development in smaller towns, villages, and the countryside. Specifically, it suggests that 62% of new housing should be directed to urban settlements, 17% to towns, and 21% to rural areas, including villages and the open countryside.

This approach is designed to support compact urban growth, reduce pressure on rural landscapes, and ensure that infrastructure and services are used efficiently. It also incorporates a phased release of housing land, allowing for flexibility in response to changing demographic and economic conditions over the plan period. By maintaining a reserve of land beyond the immediate housing growth indicators, the strategy ensures that future needs can be met without compromising sustainability.

As a stakeholder, I found this preferred option to be well-considered and aligned with the principles of balanced regional development. It reflects a pragmatic understanding of settlement capacity, environmental constraints, and community cohesion. Given its thoughtful structure and adaptability, I did not feel the need to provide further comment on this issue during the consultation process.

### Housing Policies in the Draft Strategy

The housing-related policies in the Newry, Mourne and Down Local Development Plan Draft Plan Strategy collectively aim to deliver 11,000 new homes by 2035 through a balanced, sustainable, and inclusive approach. Strategic Policy HS1 sets out the housing land allocation across the district, focusing growth in Newry City and Downpatrick, supported by local and small towns, villages, and small settlements. HS2 protects zoned housing land from inappropriate development, ensuring it remains available for residential use unless exceptional circumstances justify alternative uses. HS3 manages housing supply by phasing development, with Phase 2 sites only released when Phase 1 uptake reaches 70%, and includes mechanisms to monitor delivery and adjust as needed.

HOU1 promotes quality in residential development, requiring proposals to reflect local character, integrate with the landscape, and provide variety in design, layout, and housing types.

HOU2 mandates Design Concept Statements for small schemes and Concept Masterplans for major developments, ensuring comprehensive planning and infrastructure provision.

HOU3 governs residential extensions and alterations, ensuring they are subordinate and sympathetic to the existing dwelling and surrounding area.

HOU4 supports the conversion of buildings to flats or apartments where appropriate, provided design and amenity standards are met.

HOU5 introduces a requirement for affordable housing, with a minimum of 20% provision on qualifying sites, secured through Section 76 Planning Agreements.

HOU6 encourages a mix of housing types, sizes, and tenures to support balanced communities and respond to demographic trends, particularly the ageing population and declining household size.

HOU7 promotes adaptable and accessible homes, encouraging inclusive design and compliance with wheelchair housing standards.

HOU8 supports specialist residential accommodation, such as sheltered housing and care facilities, where there is a demonstrated need and appropriate access to services.

HOU9 addresses accommodation for the Travelling Community, requiring proposals to meet identified need and be appropriately located and designed.

The current housing policies within the Newry, Mourne and Down Draft Plan Strategy, while comprehensive in their ambition to deliver sustainable, inclusive communities, may inadvertently restrict development opportunities by being overly prescriptive and inflexible.

In particular, the combination of fixed housing zonings, prescribed densities, and mandatory social and affordable housing allocations can prevent viable schemes from coming forward. These requirements often do not account for site-specific constraints such as topography, access limitations, environmental sensitivities, or infrastructure capacity. Applying uniform density targets without regard to these factors risks undermining the feasibility of development and may result in underutilisation of land or, conversely, overdevelopment that compromises residential amenity and landscape character.

Furthermore, the rigid application of social and affordable housing quotas, typically 20% on qualifying sites, can lead to clustering or exclusion, especially in smaller settlements or edge-of-town locations. This contradicts the principle of "pepper-dotting," which aims to integrate affordable housing seamlessly across the settlement. Instead, the current approach may inadvertently segregate tenures or discourage development altogether where viability is marginal.

To support a more balanced and responsive planning framework, the policies should be amended to allow greater flexibility for site-specific circumstances. This includes enabling variable density ranges, allowing alternative affordable housing delivery mechanisms (such as off-site provision or financial contributions), and introducing viability-led assessments that consider the cumulative impact of policy requirements. Provided that development can meet reasonable and not overly onerous site requirements, such as integration, access, and environmental protection, such flexibility would support the delivery of housing in a more sustainable and context-sensitive manner.

Additionally, the Plan Strategy should explicitly facilitate economic uses on housing sites beyond ancillary functions, provided that such uses are compatible with residential amenity and meet site-specific requirements. Mixed-use development is a cornerstone of sustainable placemaking, contributing to local employment, reducing travel demand, and enhancing community vitality. By enabling small-scale commercial, retail, or employment uses within residential areas, where appropriate, the Plan can better reflect the evolving needs of communities and support more resilient, multifunctional neighbourhoods.

In conclusion, the Draft Plan Strategy for the Newry, Mourne and Down Local Development Plan is welcomed as a positive and ambitious framework for shaping the district's future. It provides a valuable opportunity for stakeholders to engage meaningfully in the planning process and contribute to the development of sustainable, inclusive, and well-connected communities. The commitment to consultation and collaboration is appreciated, and the opportunity to participate in shaping the final strategy is fully embraced.