

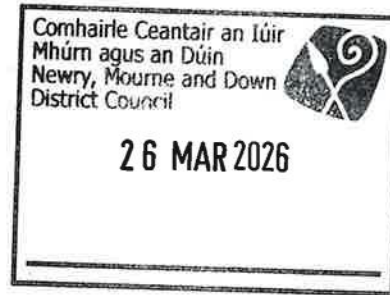


Counter Representation Form

Ref; Irish Association of Co-Housing in NMD-DPS-098

Please complete this counter representation form 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.BT306GQ



All counter representations must be received no later than 5 pm on Monday 20 April 2026.

Please complete a separate form for each counter representation.

SECTION A.

Are you responding as an individual, as an organisation or as an agent acting on behalf of an individual, group or organisation?

Please only tick one

- Individual** (Please fill in the remaining questions in section 1 (below), then proceed to Section B)
- Organisation** (Please fill in the remaining questions in section 2 (below), then proceed to Section B)
- Agent** (Please fill in the remaining questions in section 2 (below), then proceed to Section B)

1. Individual Details

Title	
First Name	
Last Name	
Address	
Telephone Number	
Email Address	

2. ORGANISATION / Agent details

NMD-DPS-CR-003

Title **Housing Charity**

Name **AN CUAN**

Job Title (where relevant) **Not applicable**

Name of Organisation / Company **AN CUAN LTD CO-HOUSING CHARITY**

Address [Redacted]

Telephone Number [Redacted]

Email Address [Redacted]

If you are representing an individual/client/company can you confirm name of individual/client/company you are responding on behalf of:

SECTION B.

Have you submitted a representation to the Council regarding the draft Plan Strategy?

Yes No N

**If yes, please provide your Reference Number ___ not applicable
Counter Representation**

In accordance with Regulation 18 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 any person may make a counter representation in relation to a representation seeking a change to the draft Plan Strategy. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the draft Plan Strategy as a result of representations submitted under Regulation 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

A counter representation must not propose any further changes to the draft Plan Strategy.

Please provide the reference number of the site-specific policy representation to which your counter representation relates to.

Counter representation to **Irish Association of Co-Housing in NMD-DPS-098**

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the Department for Infrastructure's Development Plan Practice Note 06 Soundness. Please note that your counter representation must not propose any new changes to the draft Plan Strategy.

Please note your counter representation should be submitted in full and succinctly cover all the information, evidence, and any supporting information necessary to support/justify your submission.

There will not be a subsequent opportunity to make any further submissions based on your original counter representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

(If additional space is required, please continue on a separate sheet)

We have 3 main areas of response to representations by the Irish Association of Co-Housing in NMD-DPS-098 (O’Cualann).

NMD-DPS-098

1. UK GOVERNMENT DEFINITION OF COMMUNITY LED HOUSING (ref NMD-DPS-098)

We request that UK Government definitions of Community Led Housing model are referred to in the LDP to support the submission by the Irish Association of Co-Housing in NMD-DPS-098 (O’Cualann).

This also reflects the definitions on page 27 of the NIHE’s Rural Housing Strategy.

CLH Models as defined by the UK Government

- a) **Co-housing is a form of intentional community where residents live in self-contained, private homes but share significant communal spaces and resources**
- b) **Community Land Trusts (CLTs): Not-for-profit organisations that own land to keep homes affordable for the local community forever.**
- c) **Housing Co-operatives: Managed and often owned democratically by the residents who live there.**
- d) **Tenant Management Organisations (TMOs): Social housing tenants who take over the management of their homes from a council or housing association.**
- e) **Self-Help Housing: Small groups that bring empty properties back into use**

The UK Government has established **Community Led Homes** (<https://communityled.homes/>) as a primary national resource for funding and practical advice for Councils and communities.

UK Government Support Mechanisms:

The government has introduced a growing list of supports for the CLH sector. We include a brief summary here and request that a synopsis of this is reflected in the LDP to support the submission by the Irish Association of Co-Housing in NMD-DPS-098 (O’Cualann

- **Funding & Grants:** The government has provided, and continues to invest in, targeted funding for CLH, including a recent £20 million package aimed at delivering over 2,500 homes.
- **The Community Housing Fund** was established to support pre-development and project-specific costs with £150 million available across the UK to help community groups acquire local assets and amenities.
- **Planning & Development:** Efforts are being made to simplify planning rules for community groups to reduce bureaucracy and encourage the use of infill sites.
- **Enabler Hubs & Support:** Through Community Led Homes (a partnership including Locality and the CLT Network), the government supports a network of regional hubs that provide technical expertise, advice, and training for local groups.
- **Regional Initiatives:** In Scotland, the government supports the Communities Housing Trust and South of Scotland Community Housing as part of the Rural and Islands Housing Action Plan. Additional regional initiatives exist in Wales as well.

Goals of UK Government Support for CLH:

- **Affordability:** Increasing the supply of affordable, long-term housing options, particularly through Community Land Trusts.
- **Empowerment:** Giving local communities, rather than developers, control over how and where homes are built.
- **Diversification:** Encouraging varied housing types, including cohousing and cooperatives, to address specific local needs.

2. Response to representation NMD-DPS-098 COU3

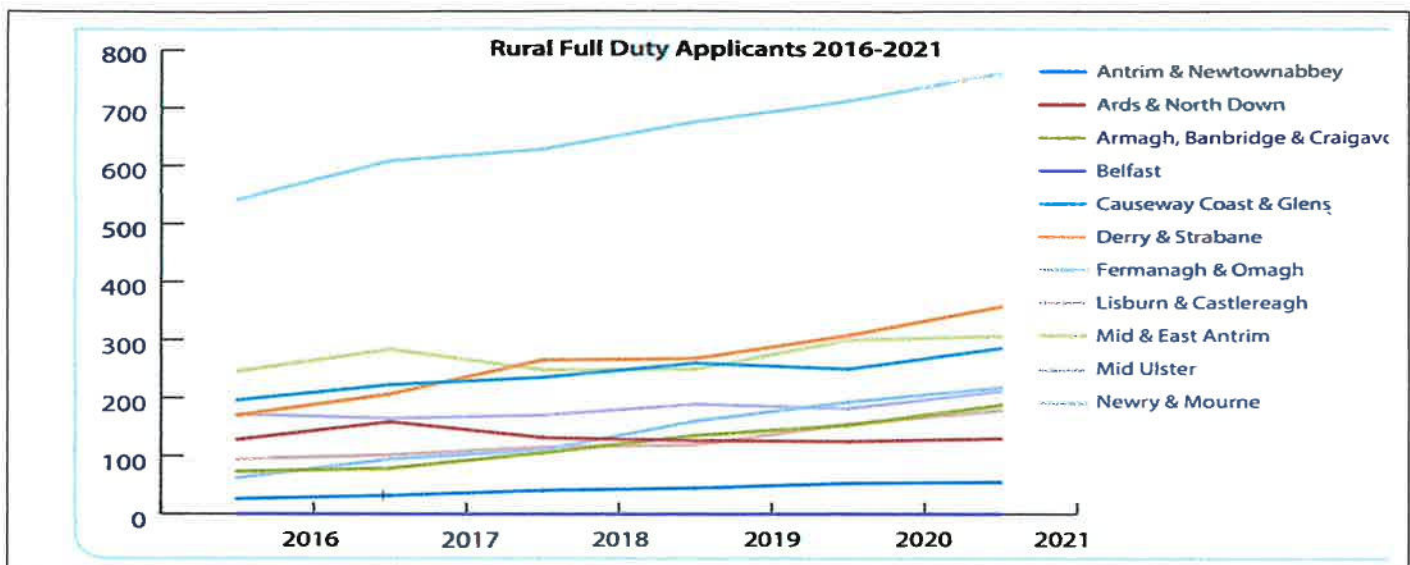
NMD-DPS-CR-003

NM&D RURAL AFFORDABLE HOUSING SHORTAGE

Northern Ireland-wide problem – But especially in Newry Mourne and Down

The Northern Irish Housing Executive (NIHE) Rural Strategy 2021 to 2025 makes it clear that targets for urban areas in Northern Ireland are generally being met, whereas rural areas have not. ***“Newry Mourne and Down continues to be the area with the highest levels of rural housing stress”.***

The areas between Strangford Lough and Carlingford Lough are the worst affected by lack of rural affordable and social housing in NI. Our local Council is by far the worst of 11 Councils for Social and Affordable need. This is almost ‘off the scale’ in NIHE’s Rural Strategy graph of the problem below.



DISGUIISING A FAR MORE SERIOUS PROBLEM

While the above picture illustrates the seriousness of the social housing problem in rural areas in Newry Mourne and Down, it does not reflect the far more serious issue of affordable housing for sale.

This is estimated by NGO's working in the field of affordable housing as being x5 or x10 more than the shortage of social housing. (see submission NMD-DPS-098 from O'Cualann Irish Co-Housing Association).

What this means on the ground in areas like East Down, Strangford, Rostrevor and other picturesque areas in NM&D, is that young families with 2 salaries cannot afford to buy a house in their own local areas. They lose out to Airbnb, short-term letting or holiday homes.

This creates issues for the viability of local primary schools, chemists, GP surgeries, shops and all the infrastructure that makes local communities viable. While the NIHE and Federation of Housing Associations recognise the seriousness of this problem, it is not formally measured in the manner of social housing need.

The points made by the submission **NMD-DPS-098** from O'Cualann Irish Co-Housing Association highlight the need to support both rural social housing as well as rural affordable housing for sale.

Hence we submit that O'Cualann's representation on a separate limit of 14/20 for social housing and a separate limit of 14/20 for affordable housing for sale be built into the new policy document.

The diagram below from the NIHE's 'Rural Strategy' again demonstrated how NM&D is an extreme outlier in provision of Social housing in the District. **The evidence on the ground suggests that the picture for 'affordable housing for sale' is far worse as suggested in O'Cualann's representation NMD-DPS-098.**

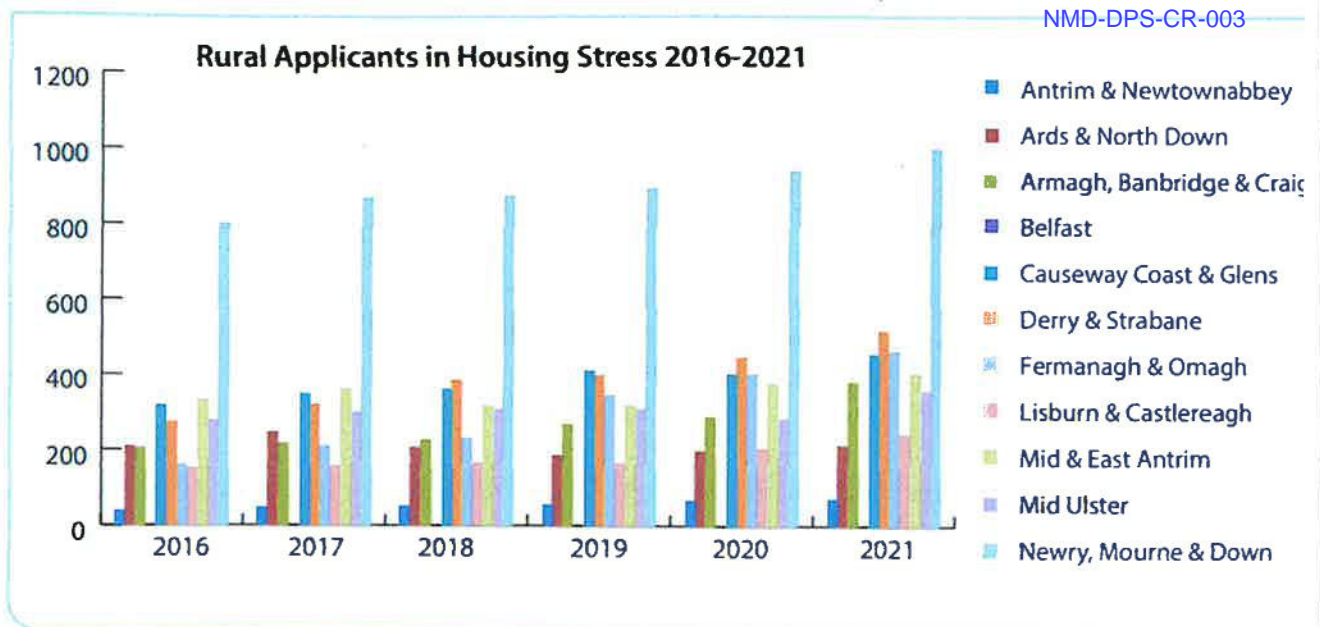


Figure 4: No. of rural waiting list applicants in housing stress (30+ points) 2016-2021

3. HOW COU3 CAN BE REFINED TO ADDRESS OTHER ISSUES IN CTY5 PPS21

There are easy fixes to the flaws in PPS21 that were inadvertently carried forward into the new CUO3. For instance.

- A separate limit could be set for Social Housing separately from Affordable Housing for Sale, with each type of affordable home getting a development limit under the policy
- Similarly, in PPS21, if a successful planning application fails due to landownership or other issues, no other development can be brought forward to replace it until the old application expires. A clause is needed in CUO3 to ensure that this flaw is not carried forward into the new policy document. Failed planning applications – once identified by the NIHE - can have a new application authorised for that settlement.
- The latest draft of COU3 does not fully and clearly list of examples of what community organisations could partner with the NIHE to deliver projects. We suggest using the definitions from the UK government in this submission or from page 27 of the NIHE's Rural Strategy Document.
- Planning gains in the shape of green space, community buildings or environmental gains were not expressly permitted in within PPS21 CTY5 or its replacement CUO3. There is no obvious reason not to encourage sustainable development models under CUO3 in replacing CTY5.
- In England, Wales, RoI and Scotland affordable housing (and social housing) would have to be built to 'NZEB' building standards to make sure that the occupants would have affordable low or non-existent energy bills. This is not reflected in PPS21CTY5 or CTY2. Without planning guidance, a Housing Association is unlikely to cover what they would see as the extra cost of something that is not required of them by law. If planners required NZEB standards in every affordable housing planning application, NIHE would have to fund it. Recent technological changes make the capital cost of this change either 'nil' or negligible.

The new COU 3 proposal needs to specifically allow NIHE-supported community-led housing organisations or other housing community-led non-profit housing providers or partnerships supported by the NIHE to bring forward projects. CUO3 needs to make it clear that community and non-profit actors can bring forward affordable housing for sale proposals in their own area.

We need to avoid the mistakes of PPS21 in not specifying that non-profit and community organisations can bring forward projects in conjunction with NIHE. Otherwise there is a danger that NM&D will replicate the history of PPS21 where no 'affordable housing for sale' schemes have ever been delivered in 15 years of PPS21 anywhere in Northern Ireland.

Rural Social and Affordable Housing shortage is worse in Coastal areas

NMD-DPS-CR-003

Picturesque villages in rural areas along the North Coast, Strangford Lough and in South Down facing the Irish Sea have found their populations unable to access social and affordable housing in recent years. Housing associations are concentrating on urban areas, while regulatory/legislative blockages prevent affordable housing for sale being built in NI. This has been exacerbated by a post C-19 tendency for well-off city dwellers to buy up properties in these areas either to work from their new homes or as weekend homes.

Villages in East Down are increasingly seen as ideal locations for wealthy retirees. South Down is also under pressure from retirees from the Republic. Several NI villages in these areas have been nominated by media sources as idyllic retirement locations for people across the UK and Ireland including Strangford Village in the 'Sunday Times' in March 2022 as "best places in the UK to live".

This leaves locals in these villages with unaffordable rents competing with the holiday let market and Airbnb. The average N.I. family income in rural areas cannot keep pace with the cost of a mortgage in an area where house prices have been 'bid up'. The loss of local families from villages puts local schools under pressure. This also impacts on the critical mass of customers needed to sustain services like local chemists, doctor's surgeries, shops and filling stations.

Approximately every 15 years, land is zoned for development in settlements around NI. These lands are normally snapped up for private development. Some smaller settlements might not have land zoned at all.

The resulting pent-up demand also drives an excessive pressure for once-off-housing in the country.

HOW COU3 CAN HELP ADDRESS THESE RURAL HOUSING NEED ISSUES

A ready-made solution for these issues ought to have existed in Planning Policy Statement 21 (PPS21) "*Sustainable Development in the Countryside*". Within PPS21, policies PPS21 CTY5 '*Social and Affordable Housing*' in rural settlements and PPS21 CTY2 '*Development in Dispersed Communities*' should provide 'off the shelf' solutions to the above problems.

However, the restrictive wording of CTY5 and CTY2 have made them 'not fit for purpose' and unable to deliver sufficient social housing **and completely unable to deliver affordable housing for sale** in small rural villages and in dispersed communities.

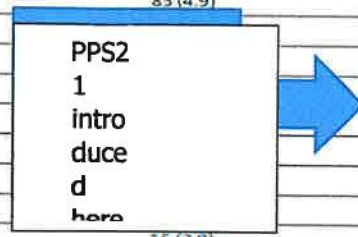
COU3 as currently worded lifts the the PPS21 restriction on Affordable Housing for rent or sale only being delivered by Housing Associations. It allows CLH groups with the support of the NIHE to submit planning applications.

Until very recently, no Housing Association in NI was legally able under their constitutions to deliver affordable housing for sale. So, the CTY5 restriction was effectively a ban on affordable housing for sale. **Unsurprisingly this restriction had consequences. Not a single development of affordable housing for sale was delivered under PPS21 in 15 years anywhere in N.I.. The failure of the policy to specify BOTH the possibility of affordable housing for sale AND its delivery by community-led development was interpreted as a ban on such development under PPS21.**

It is important that the new policy documents avoid this problem in the manner suggested by the representations in NMD-DPS-098 from O'Cualann Irish Co-Housing Association.

Table 6 Planning Decisions for Single Dwellings in the Countryside in Tenancy, Moyne and Down District 2002-2016

Year	Approvals (%)	Refusal (%)	Withdrawals (%)	Total
2002-2003	1444 (75.4)	171 (8.9)	300 (15.6)	1915
2003-2004	1606 (74.6)	281 (13.0)	263 (12.2)	2150
2004-2005	1464 (63.8)	511 (22.2)	319 (13.9)	2294
2005-2006	1346 (47.6)	1144 (40.5)	334 (11.8)	2824
2006-2007	1021 (56.9)	682 (38.0)	91 (5.0)	1794
2007-2008	1321 (79.4)	258 (15.5)	83 (4.9)	1662
2008-2009	1164 (95.0)	22 (1.7)		1225
2009-2010	1069 (86.1)	95 (7.6)		1241
2010-2011	701 (68.5)	223 (21.7)		1023
2011-2012	711 (76.3)	172 (18.4)		931
2012-2013	599 (78.1)	136 (17.7)		766
2013-2014	445 (83.6)	56 (10.5)		532
2014-2015	423 (81.3)	69 (13.2)		520
2015-2016	309 (80.2)	61 (15.8)	15 (3.8)	385
2016-2017	559 (76.9)	113 (15.5)	55 (7.6)	727



Both the NIHE and the Federation of Housing Associations have argued that PPS21’s record in delivering social and affordable housing was an overall failure and the above statistics bear this out.

Benefits of CUO3

Firstly, the policy now permits community-led housing organisations or other housing providers or partnerships supported by the NIHE to bring forward projects. CTY 5 in PPS21 was restricted to Housing Associations who had a strong preference to concentrate on large developments in urban areas.

Housing Associations have largely the same management overheads in delivering a large urban development as a small rural one. They openly admit that this pre-disposes them to concentrate on urban areas. The statistics in NM&D and across NI bears this out.

Secondly, the restriction on Affordable Housing for rent or sale only being delivered by Housing Associations under PPS21 is also lifted. Until very recently no Housing Association in NI was legally able under their constitutions to deliver affordable housing for sale. So this restriction was effectively a ban on affordable housing for sale.

Finally, the ability for community-led housing organisations or other housing providers or partnerships supported by the NIHE to develop green belt land near the boundaries reflects UK Government policy per page 2 of this submission. This is a big plus as it allows communities and community organisations to work with the NIHE to deliver village-based solutions to shortages of social and affordable housing with local support.

In accordance with the Data Protection Act 2018, Newry, Mourne and Down District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should also be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure (DfI), and they will then be considered as part of the Independent Examination (IE) process.

Counter representations will be treated in accordance with the LDP privacy notice which is available to view at www.newrymournedown.org/draft-plan-strategy or is available on request by emailing ldp@nmandd.org

By proceeding and signing this counter representation form you confirm that you have read and understand the privacy notice above and give your consent for Newry, Mourne and Down District Council to hold your personal data for the purposes outlined.

Please note that when you make a counter representation to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website unless you request otherwise.

Signature

Date