



Comhairle Ceantair
**an Iúir, Mhúrn
 agus an Dúin**
**Newry, Mourne
 and Down**
 District Council

Local Development Plan 2035 draft

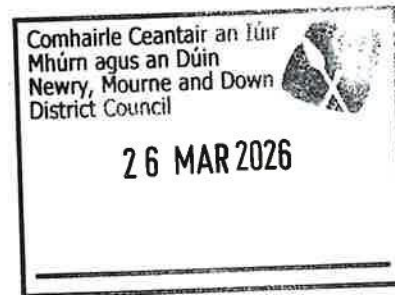
Plan Strategy

Counter Representation Form

Ref; Counter representation to **Department of Communities (NMD-DPS-0032)**

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

Title

Housing Charity

Name

AN CUAN

Job Title (where relevant)

Not applicable

Name of Organisation / Company

AN CUAN LTD CO-HOUSING CHARITY

Address

Telephone Number

Email Address

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 **Department of Communities (NMD-DPS-0032)**

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)

Representation from Department of Communities (NMD-DPS-0032)

The Department does not address the issue of 'affordable housing for sale' by Community Led Housing Organisations. It does not reference community-led housing, or mention any of the UK-Government recognised CLH models which are mentioned in the policy CUO3 as being able to bring forward planning applications with the support of the NIHE

We note that the co-ownership model in NI is mentioned by the department in its submission, BUT Co-Ownership is legally unable to deliver new housing estates for sale. Co-ownership simply finances existing houses for those unable to afford to buy 100% of a market-priced house.

The NIHE-supported CLH sector needs to continue to be enshrined in COU3 as drafted to deliver affordable housing for sale.

We suggest that ;

- 1. The LDP on COU3 continues to ensure that the NIHE Rural Housing Strategy is respected and reflects the types of CLH described on page 27 of that strategy. This is aimed at ensuring that Community Led Housing projects delivering affordable housing for sale are not inadvertently omitted as a result of this submission from the department.**
- 2. That the UK Government definitions (below) or NIHE's definitions of Community-Led Housing are used in COU3**
- 3. The LDP continues to reflect UK Government Policy on Community-Led Housing as shown below and does not restrict the new policy to Co-Ownership. Co-Housing is legally unable to deliver new housing for sale, it can only make existing housing more affordable via cheap lending to their applicants to buy at full market price.**

CLH Models as defined by the UK Government

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

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

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.

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 correct

Representation from Department of Communities (NMD-DPS-0032)

- **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.

SECTION C.

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

[Redacted Signature Box]

Date

23 / 03/ 2026