



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

Local Development Plan 2035 draft

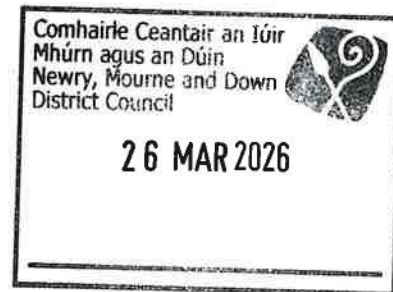
Plan Strategy

Counter Representation Form

Ref; Counter representation to **Formative Architects (NMD-DPS-057)**

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 **Formative Architects (NMD-DPS-057)**

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.

Representation from Formative Architects (NMD-DPS-057)

We would also wish to amplify the points made in NMD-DPS-057. COU3 corrects the gap in CTY5 in PPS21 and allows NIHE-supported Community-Led Housing Scheme (CLH) planning applications for affordable housing for sale to be brought forward adjacent to villages, in addition to planning applications for Social Housing For Rent.

Firstly, there are many villages across the district where a 14/20 limit would be insufficient for NIHE's measured recorded need. Especially in villages where there have been no social or affordable developments for several decades. Some flexibility needs to be shown in areas where an exceptional need exists.

The second point we support in representation NMD-DPS-057 is that the 'affordable housing for sale' market is a separate and distinct type of housing market to the 'social housing for rent' market. **This type of Housing also needs a separate limit from the one mentioned above.** Otherwise, in many villages, there would have to be an impossible choice between affordable housing for social rent and affordable housing for sale. As demand in many villages exceeds the proposed limit in both types of affordable housing.

There needs to be room for both types of affordable housing in our villages across NM&D Council. Villages in our District need both types of housing and one limit of 14/20 covering both does not represent the reality of social need.

Lastly, it is important that the new policy COU3 references all types of CLD recognised by the UK Government (see below) and highlighted on page 27 of the NIHE's Rural Housing Strategy 2025.

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** (<https://communityled.homes/>) as a primary national resource for funding and practical advice

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

Date