

## Local Development Plan 2035

### draft Plan Strategy

### Counter Representation Form

Please complete this counter representation form 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 counter representations must be received no later than 5pm 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	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Address	<input type="text"/>
Telephone Number	<input type="text"/>
Email Address	<input type="text"/>

**2. Organisation / Agent Details**

Title

Name

Job Title (where relevant)

Name of organisation / company

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

**If yes, please provide your Reference Number** \_\_\_\_\_

**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.

**NMD-DPS-005 & NMD-DPS-056**

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.

See attached supporting statement

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

## SECTION C.

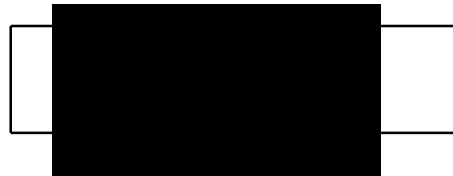
In accordance with the Data Protection Act 2018, Newry, Mourne and Down District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law 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](http://www.newrymournedown.org/draft-plan-strategy) or is available on request by emailing [ldp@nmandd.org](mailto: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

A large black rectangular redaction box covers the signature area. The box is flanked by two small white rectangular boxes on either side, which appear to be part of the form's layout.

Date

17th April 2026



**PLANNING  
PERMISSION  
EXPERTS**

## **COUNTER REPRESENTATION**

Counter representation to the Draft Plan Strategy – Housing Provision  
*Newry, Mourne and Down Local Development Plan 2035*

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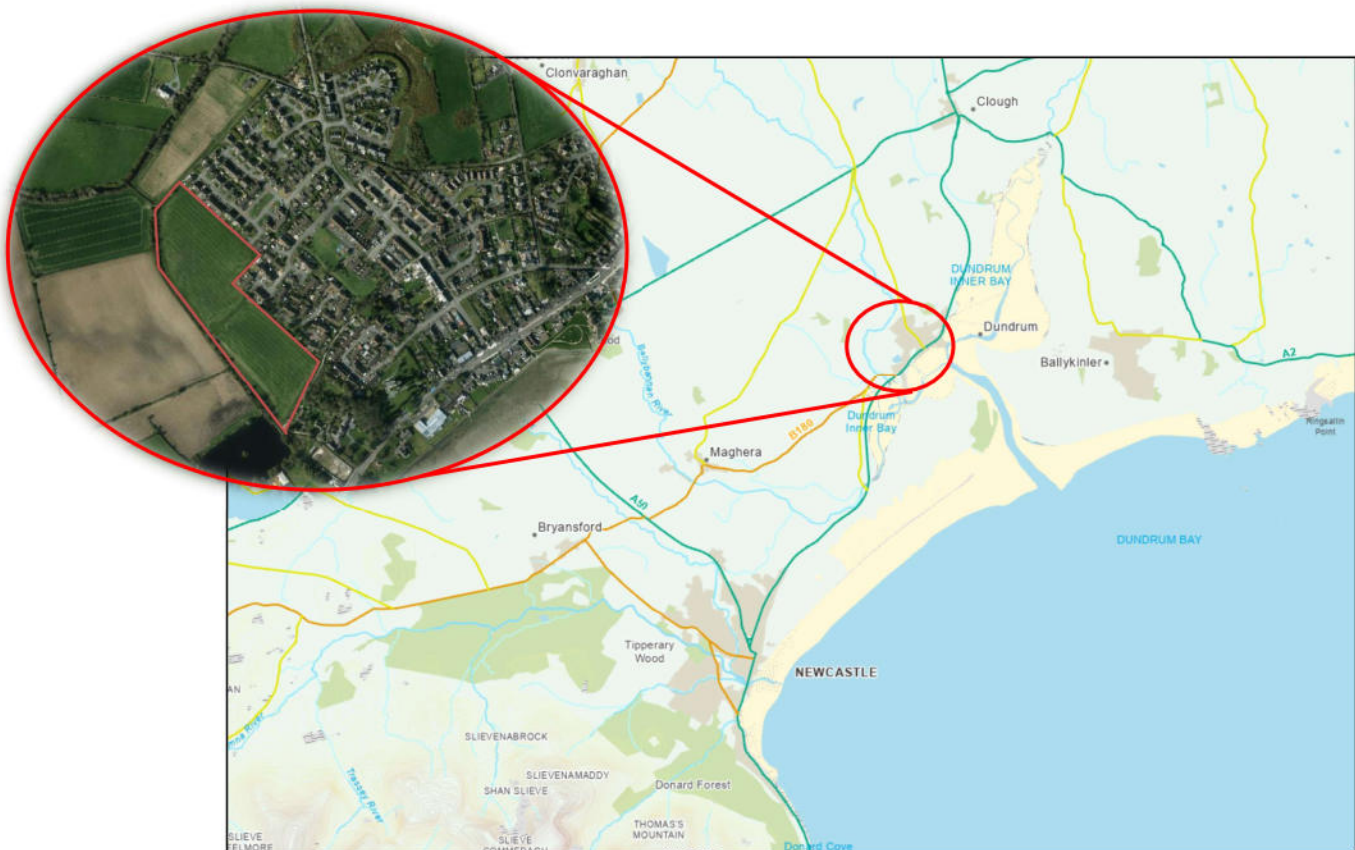
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## – Counter Representation

### Introduction

- 1.1 This counter representation is submitted on behalf of [REDACTED] who controls lands south west of Castleglen Way/De Courcey Way, Dundrum.
- 1.2 We write in response to Representation Ref: **NMD-DPS-005 & NMD-DPS-056**, which raises concerns regarding the adequacy of housing provision within the Plan Strategy.
- 1.3 We support the thrust of this representation, specifically its conclusion that the Plan Strategy fails to provide a sufficient and flexible housing land supply in Dundrum, in accordance with regional policy and evidenced need.



– Counter Representation

**Position Summary**

2.1 The summary of our position is as follows:

- The Plan Strategy significantly underestimates housing need in Dundrum, whereby it relies solely on completions and extant permissions (7 units).
- This does not represent a sustainable housing strategy.
- There is a clear mismatch between identified housing need and available supply. The NIHE waiting list alone for the Dundrum area (incl. Seaforde and Clough) is 35no units.
- The strategy relies on district-wide supply, which masks a lack of provision at settlement level.
- Dundrum is treated as an outlier compared to comparable villages, with no clear justification.
- The evidence base appears outdated and insufficiently tested, and no alternative growth scenarios have been considered.

2.2 Accordingly, the dPS fails soundness tests C1, C3, CE1, CE2, CE3 and CE4.

**Absence of a Forward Housing Strategy**

3.1 Policies HS1–HS3 of the Draft Plan Strategy (dPS) set out the Council’s approach to housing growth across the district for the period 2020–2035. Table 6 identifies an overall requirement for 10,630 new dwellings (equating to approximately 710 units per annum) over the plan period. This comprises 6,540 market dwellings and 4,090 affordable dwellings (including both intermediate and social housing).

3.2 The dPS acknowledges the need to apply a 10% flexibility allowance to ensure that the full extent of NIHE identified housing need can be met. Accordingly, the overall housing requirement is increased to 11,000 dwellings by 2035.

3.3 Policy HS1 of the Plan Strategy identifies a total housing land supply of only 7 units in Dundrum, comprising:

- 5 completed dwellings
- 2 units with extant planning permission

Tier	Settlement	Indicative Housing Allocation
<b>City/Main Town</b>	Newry	2,688
	Downpatrick	1,824 (2,235*)
<b>Total 38%*</b>		<b>4,512 (4,923*)</b>
<b>Local and Small Towns</b>	Newcastle	468
	Warrenpoint/Burren	665
	Kilkeel	720
	Ballynahinch	676 (1,103*)
	Saintfield	55
	Killyleagh	179
	Castlewellan	44
Crossmaglen	263	
<b>Total 27%*</b>		<b>3,070 (3,497*)</b>
<b>Villages</b>	Bessbrook	301
	Rostrevor	119
	Annalong	171
	Crossgar	123
	Ardglass	348
	Dundrum	7
	Hilltown	74
	Drumaness	87
	Camlough	80
	Mayobridge	39
	Killough	75
	Newtownhamilton	65
	Meigh	11
	Annsborough	41
	Ballyholland	46
	Mullaghbane	12
	Ballymartin	9
Forkhill	57	
Strangford	60	
Jonesborough	53	
Ballykinler	25	
Cullyhanna	40	
Clough	15	
<b>Total 16%*</b>		<b>2,032**</b>
<b>Small Settlements 6%*</b>		<b>725</b>
<b>Total (all Settlements)</b>		<b>10,339 (11,177*)</b>
<b>Countryside 13%*</b>		<b>1,686</b>
<b>Total (inc Phase 2)</b>		<b>12,025 (12,863*)</b>

Figure 1: Policy HS1 – Housing Allocation

## – Counter Representation

3.4 The Technical Supplement 2 and associated appendices confirms that Dundrum does not benefit from:

- Zoned housing land
- Urban capacity sites
- Windfall allowance

3.5 This demonstrates that the Plan Strategy does not allocate any new or future housing land within Dundrum. Instead, it relies entirely on historic delivery and extant permissions, some of which may not be delivered. This does not represent a sustainable approach to housing growth.

3.6 Furthermore, there is no assessment of the likelihood of delivery of the committed units, nor any alternative supply should they not come forward.

### **Housing Need**

4.1 NIHE data identifies a social housing need of 35 units within the Dundrum area (NIHE Housing Investment Plan, 2025 Update – Figure 2).

4.2 Furthermore, Dundrum as a settlement, is also suitably position to ease housing pressure on the local town of Newcastle, where the social housing need is 286. The RDS confirms that while a number of potential clusters have been identified, there is nothing to prevent other towns working together in cluster and this should be encouraged.

4.3 Despite the above NIHE figures, the Plan Strategy identifies a total housing supply of only 7 units in Dundrum, over the entire plan period (2020–2035).

4.4 This demonstrates the number of homes provided under the Plan Strategy, will not meet the total number of homes that will be required during the plan period.

4.5 Even when considering only identified social housing need (35 units), the Plan Strategy provides for just 7 units and does not allocate any additional land to address this gap. As such, there is no realistic means by which identified housing need can be met within Dundrum.

4.6 Furthermore, the NIHE figure relates only to social housing and does not capture wider housing demand, including households unable to access social housing. The actual level of need is therefore likely to be higher.

## – Counter Representation

Settlement	Social Housing Need 2024-29
Creggan	2
Crossgar / Annacloy	67
Crossmaglen	66
Culloville	11
Cullyhanna	4
Drumaness	19
Drumintee	2
Dundrum / Seaforde / Clough	35
Forkhill	18
Granite View	1
Hilltown	40
Jonesborough	10
Kilcoo	8
Kilkeel / Greencastle / Ballyardie / Dunnaman	83
Killeen	5
Killough	19
Kilmore / Loughinisland / Annadom	1
Killyleagh	48
Lurganare / Barmmeen	8
Mayobridge	15
Meigh	24
Mullaghbawn	13
Newcastle	286
Newtowncloghogue	23

Figure 2: NIHE Housing Investment Plan Social Housing Need, 2025 Update.

### Reliance on District-Wide Supply

5.1 The Council's evidence base suggests that overall housing supply across the district exceeds the identified requirement. However, this district-wide surplus does not address localised settlement-level deficiencies. For example, in Dundrum:

- Total supply for housing is 7 units
- No future land identified

5.2 This demonstrates that, while there may be sufficient supply across the district as a whole, housing land is not available in the locations where it is needed.

5.3 The Plan Strategy therefore fails to ensure that housing supply is appropriately distributed to meet local need, contrary to soundness tests CE2 and CE3.

### Inconsistent Distribution of Growth

## – Counter Representation

6.1 Dundrum, with a population of approximately 1,551, is comparable to settlements such as:

- Hilltown (1,698) – 74 units
- Annalong (1,796) – 171 units
- Crossgar (1,892) – 123 units
- Ardglass (1,643) – 348 units

6.2 However, Dundrum is identified as having a total housing supply of only 7 units.

6.3 This disparity is further reinforced by smaller settlements such as:

- Strangford (495) – 60 units
- Jonesborough (465) – 53 units
- Forkhill (498) – 57 units

6.4 This demonstrates that:

- Comparable settlements receive substantially greater provision
- Smaller settlements also receive higher allocations

6.5 There is no clear or evidence-based explanation for this disparity.

6.6 The distribution of housing growth is therefore inconsistent and not proportionate, contrary to CE2 and CE3.

### **Failure to Consider Alternative Growth Scenarios**

7.1 The housing strategy appears to rely on a single approach to forecasting housing need, based primarily on HGI figures from 2016, with a 10% flexibility allowed added to achieved the proposed target of 11,000 dwellings.

7.2 There is no evidence that alternative scenarios have been considered, including:

- Higher growth scenarios
- Settlement-specific need
- Market-driven demand

7.3 This indicates that reasonable alternatives have not been adequately assessed, contrary to soundness test CE2.

### **Evidence Base and Changing Conditions**

8.1 The Strategic Housing Market Analysis underpinning the Plan Strategy appears to rely on data from 2020–2022.

## – Counter Representation

8.2 Since that time, there have been material changes in housing market conditions, including:

- Increased house prices
- Rising private rents
- Worsening affordability

8.3 There is no clear evidence that these changes have been reflected in the housing requirement.

8.4 Accordingly, the Plan Strategy is not based on a sufficiently up-to-date or robust evidence base, contrary to CE2.

### **Dundrum Constraints and Lack of Alternatives**

9.1 Dundrum is a constrained settlement, with limited capacity for development within its existing boundary.

9.2 Opportunities for expansion are restricted due to:

- Environmental and landscape designations (ASSI, Seascape Character Area, LLPA, SLNCI)
- Heritage designations, including the setting of Dundrum Castle (ATC, ASAI, Listed Buildings)
- Physical features and existing built form (Areas of Open Space, Access)

9.3 As such, opportunities for growth are limited and this makes the absence of any planned provision particularly significant.

— Counter Representation

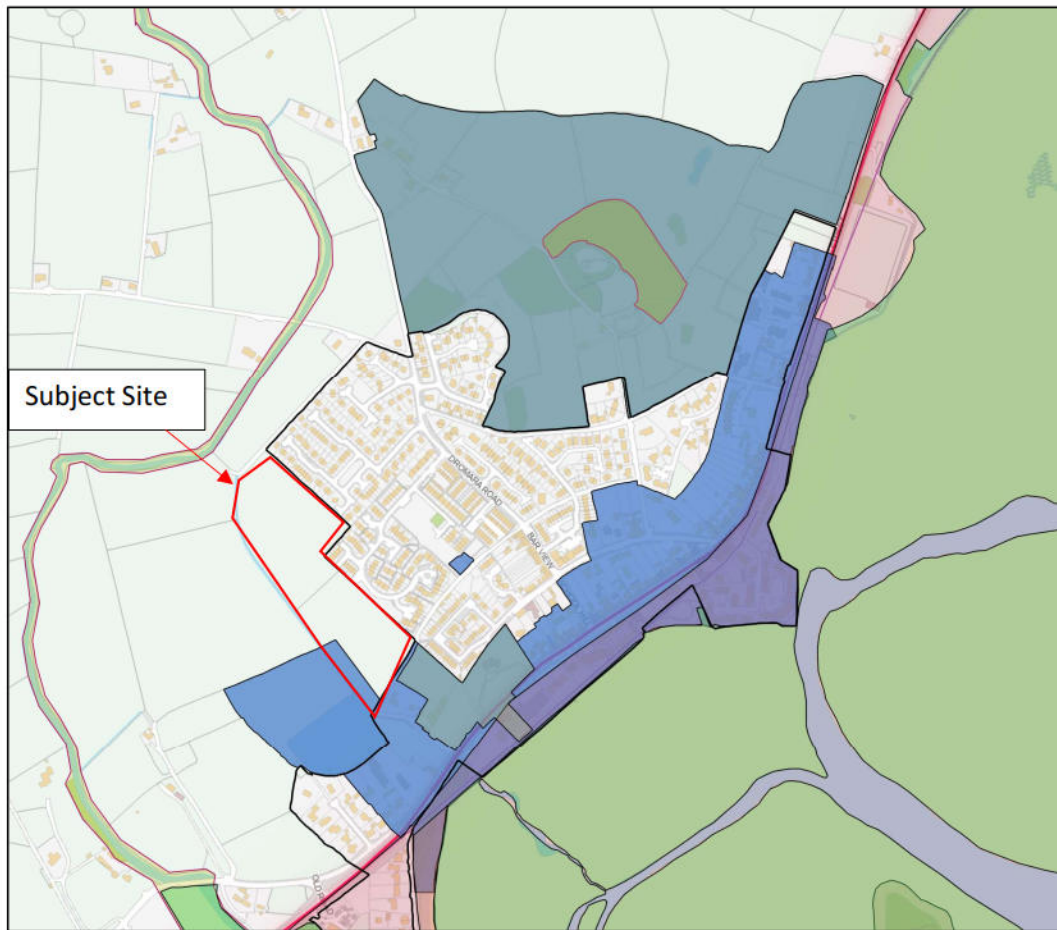


Figure 3: Ards and Down Area Plan 2015 – Dundrum Constraints

## – Counter Representation

### Suitability of Lands Southwest of Castleglen Way/De Courcey Way, Dundrum

10.1 Lands Southwest of Castleglen Way/De Courcey Way, Dundrum represent a logical and deliverable opportunity for settlement expansion. The site:

- Lies immediately adjacent to the settlement limit
- Is directly connected to the settlement via an adjoining Housing Policy Area
- Is not subject to fluvial flood risk, with only limited surface water constraints capable of mitigation
- Represents a natural and defensible extension of the settlement

10.2 The site could deliver a significant number of dwellings, which would ease social housing waiting lists both in Dundrum and nearby Newcastle, as well as providing an appropriate level of affordable and market housing.

10.3 In the context of limited alternatives, this represents a sustainable and appropriate opportunity to meet housing need.

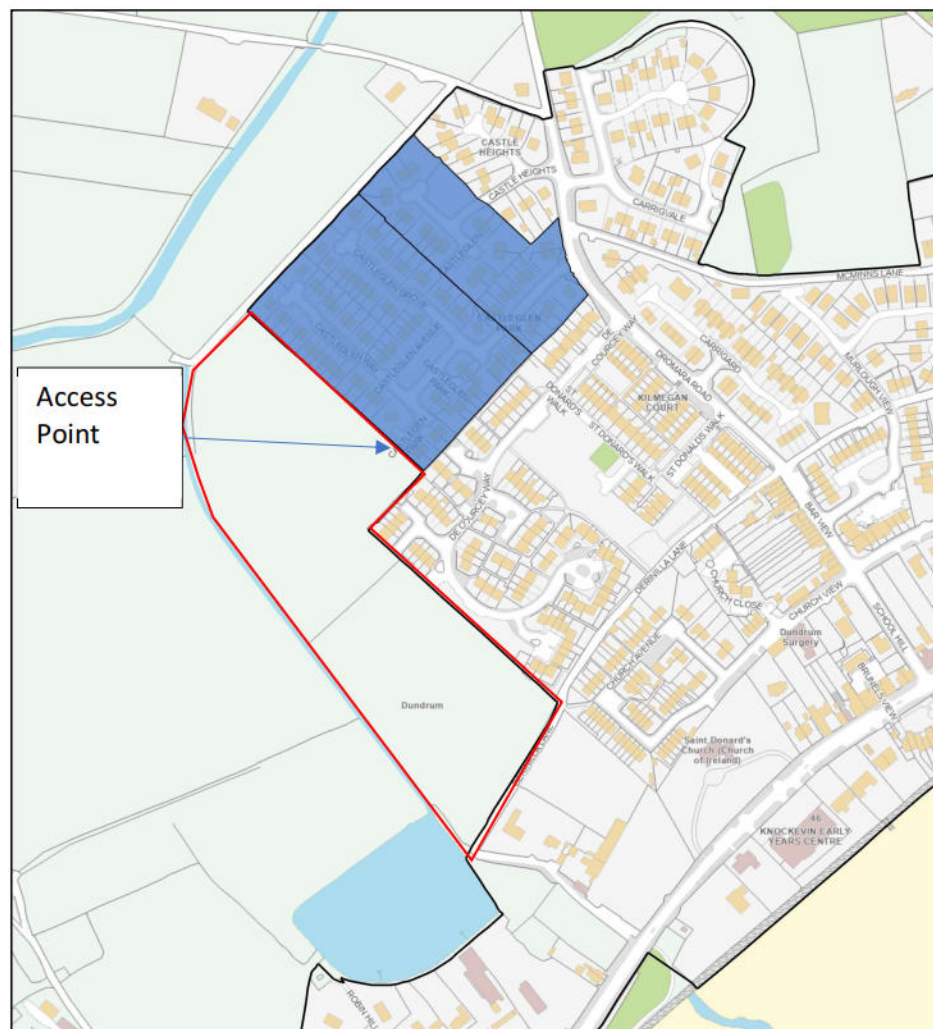


Figure 3: Ards and Down Area Plan 2015 – Site Location & Housing Policy Area

## – Counter Representation

### Sustainable Development

11.1 In the absence of identified land within Dundrum, housing need is likely to be met through development in the countryside.

11.2 This would represent less sustainable development, than the provision of housing:

- Within settlements;
- Accessible to services and facilities;
- Integrated with existing communities

11.3 A modest settlement extension at Dundrum would therefore represent a more sustainable planning response.

11.4 The current approach is therefore contrary to the SPPS, which requires a sufficient and flexible supply of housing land (C3), and inconsistent with the RDS, which seeks to ensure an adequate supply of housing (C1).

### Required Change

12.1 It is therefore respectfully requested that the Plan Strategy be amended to:

- a) Provide a clear and evidence-based level of housing growth for Dundrum
- b) Increase housing provision to reflect:
  - i. Identified social housing need
  - ii. Wider housing demand
- c) Introduce flexibility in housing supply
- d) Recognise the role of sustainable settlement expansion, including at Dundrum

### Conclusion

13.1 We support Representation Ref: **NMD-DPS-005 & NMD-DPS-056** in their conclusion that the Plan Strategy fails to provide an adequate housing supply, specifically in Dundrum. The proposed level of growth is wholly insufficient when considered against identified need.

13.2 The Plan Strategy:

- Does not provide a sustainable, sufficient housing allocation for Dundrum.
- Fails to address identified social housing need (35 units)
- Relies on historic supply rather than future planning (CE2)
- Treats Dundrum inconsistently compared to similar settlements (CE2/CE1)
- Provides no clear mechanism for delivery (CE3)
- Lacks flexibility to respond to change (CE4)

## – Counter Representation

13.3 A revised approach, including the provision of additional housing land at Dundrum, is therefore necessary to ensure the Plan Strategy is sound, effective and deliverable.