

Hello Local Development Plan team,


Please see below counter representation made on behalf of our client, [REDACTED]

This counter-representation has been made in support of the representations NMD-DPS-058, which highlights the inadequate housing allocation for Newcastle.

If you require any further information, please let me know.

Regards,

[REDACTED]

 Planning Permission
Experts

[REDACTED]
[REDACTED]
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Local Development Plan 2035

draft Plan Strategy

Counter Representation Form

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 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

First Name

Last Name

Address

Telephone Number

Email Address

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.

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 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

A rectangular box with a black border, containing a solid black redaction that completely obscures the signature.

Date

17th April 2026



**PLANNING
PERMISSION
EXPERTS**

COUNTER REPRESENTATION

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

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– Counter Representation

1. Introduction

This counter representation is submitted on behalf of our Client, [REDACTED], who controls lands at South-east of 14 Seacliff Close, Newcastle.

This submission responds to Representation Ref: NMD-DPS-058, supporting concerns regarding the adequacy of housing allocations for Newcastle under the Draft Plan Strategy (dPS). Furthermore, the evidence base is not considered robust and reliable, and fails to account for the deliverability of the currently proposed housing allocation.

It is our consideration that our clients land, on the south eastern edge of Newcastle is suitable and can facilitate the delivery of housing in the Newcastle area.



Figure 1: Site Location

– Counter Representation

2. Summary of Position

- The dPS identifies a housing allocation of 468 units for Newcastle.
- The strategy is not supported by a robust or realistic assessment of delivery.
- The dPS relies heavily on existing zonings, commitments and estimated capacity, without proper assessment of site constraints or viability.
- The strategy fails to reflect the significant housing demand pressures in Newcastle.
- The dPS does not provide a forward-looking spatial strategy, instead reflecting a continuation of existing supply.

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

3. Plan Period and Forward Strategy

The purpose of the LDP is to provide a forward planning framework to guide development over a 15-year period. However:

- The dPS is being prepared midway through the plan period (2020–2035)
- A significant portion of the identified supply relates to:
 - Completed development
 - Existing permissions

As a result:

- The dPS does not meaningfully plan for future growth, but instead reflects a snapshot of existing supply.

This is contrary to the SPPS and DPPN 1, which require a proactive, long-term spatial strategy (C3).

4. Housing Supply and Deliverability

The dPS identifies a total housing allocation of 468 units for Newcastle, of which 86 units have already been completed, with the remaining supply expected to come from committed sites, zoned land, and urban capacity and windfall estimates. However, there is no detailed assessment of the deliverability of these sources of supply, including key factors such as site constraints (including topography, access and servicing), ownership or availability, or realistic phasing and build-out rates. Instead, a broad-brush density assumption (for example 25 dwellings per hectare) has been applied across sites, which may not reflect site-specific circumstances. As a result, some sites identified through the urban capacity study may not be realistically deliverable within the plan period.

This suggests that the identified supply is Overestimated and not founded on a robust evidence base, contrary to CE2.

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5. Over-Reliance on Existing Supply

The dPS relies heavily on existing zoned land, housing monitor sites and urban capacity estimates to meet its housing allocation. However, some of these sites may have remained undeveloped for extended periods, and the constraints affecting their delivery have not been fully assessed. In addition, no non-implementation allowance has been applied to account for sites that may not come forward. Experience from previous plans demonstrates that not all zoned land will be delivered within the plan period. The current approach therefore risks overestimating housing supply and fails to provide a reliable mechanism for delivery, contrary to soundness test CE3.

6. Failure to Reflect Market Demand and Alternative Growth Scenarios

The housing strategy is informed by NIHE data, which identifies a social housing need of approximately 244 units in Newcastle. However, Newcastle is a high-demand coastal settlement and a key tourism destination, subject to additional pressures including second home ownership, holiday accommodation demand, and increasing house prices alongside reduced affordability. As a result, the NIHE figures are likely to significantly understate the true level of housing demand in the area, and the strategy does not fully reflect the complexity of the local housing market.

Furthermore, the housing strategy underpinning the Plan Strategy appears to rely on a single approach to forecasting housing need, based primarily on Housing Growth Indicator (HGI) figures derived from 2016, with a 10% flexibility allowance applied to reach the proposed target of 11,000 dwellings. There is no clear evidence that alternative growth scenarios have been considered, including higher growth scenarios, settlement-specific demand and need, or market-driven housing demand.

There is no evidence that the Council has tested whether the identified housing land supply at settlement level, including in Newcastle, is sufficient, appropriate or deliverable under different growth assumptions. This is especially relevant where, as set out above, a significant proportion of the identified supply is uncertain in terms of delivery.

The failure to properly assess housing demand or consider reasonable alternatives indicates that the Plan Strategy is not founded on a sufficiently robust or evidence-based approach. Accordingly, the Plan Strategy fails to take proper account of the role of Newcastle within the district and its capacity to accommodate growth, and fails to meet the requirements of soundness tests C1 and CE2.

7. Lack of Flexibility

The dPS does not provide sufficient flexibility in housing supply. In particular, it relies heavily on a limited number of sites, with no contingency should those sites fail to deliver, and no reserve or additional allocations identified. Furthermore, the application of a fixed housing allocation of 468 units for Newcastle acts as a constraint in itself, limiting the ability of the Plan Strategy to respond to changing circumstances, market demand, or delivery challenges over the plan period. This approach does not reflect best practice in plan-making and fails to

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respond to the inherent uncertainty in housing delivery. The Plan Strategy is therefore not sufficiently flexible, contrary to soundness test CE4.

8. Suitability of Lands southwest of 13 Seacliff Close, Newcastle

The subject lands represent a suitable and deliverable opportunity for housing growth.

The site:

- Lies adjacent to the existing settlement limit
- Is well related to the existing built form
- Has good access and connectivity
- Is not subject to significant constraints such as flood risk, ecology etc.
- Is capable of delivering housing within the plan period

The site would:

- Provide a range of housing types and tenures
- Support sustainable travel patterns
- Enable people to remain within their community
- Contribute to a more robust and flexible housing supply



Figure 2: Proposed SDL Extension

– Counter Representation

9. Required Change

To ensure the Plan Strategy is sound, it is requested that:

1. The housing strategy is revised to:
 - a. Reflect deliverability and infrastructure constraints
 - b. Properly assess site viability and capacity
2. Additional housing land is identified in Newcastle to:
 - a. Improve flexibility and resilience
 - b. Address market demand pressures
3. The role of Newcastle as a key growth and tourism settlement is properly recognised

10. Conclusion

The dPS does not provide a robust or deliverable housing strategy for Newcastle, as it is considered to:

- Rely on an uncertain and potentially undeliverable supply
- Overestimates the contribution of existing sites
- Does not reflect actual housing demand
- Lacks flexibility to respond to changing circumstances

The dPS is therefore unsound, particularly in respect of C1, C3, CE2, CE3 and CE4.

The inclusion of the subject lands would provide a realistic, deliverable and sustainable opportunity to strengthen the housing strategy and ensure the Plan Strategy is capable of delivery.