

Hi Newry, Mourne and Down Local Development Plan team.. Please see attached counter representation and completed form for the lands adjacent and north off Cherry Hill Rostrevor. This is put forward for the rezoning of land for the emerging local development plan..

Kind regards

█

██████████



**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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## – Counter Representation

### 1. Introduction

**1.1** This counter representation is submitted on behalf of [REDACTED] who controls lands located immediately adjacent to the settlement development limit of Rostrevor, in proximity and just north of Cherry Hill housing estate.

**1.2** This submission is made in response to the Newry, Mourne and Down Local Development Plan 2035 Draft Plan Strategy (dPS), specifically in relation to the adequacy, distribution and deliverability of housing land supply within Rostrevor.

**1.3** It is contended that, while the Plan Strategy identifies a quantum of housing land supply for Rostrevor, this is overly reliant on sites which are constrained and have not demonstrably come forward for development. As such, the Plan Strategy fails to provide a sufficiently robust, flexible and deliverable housing land supply.

**1.4** This representation highlights deficiencies in the current approach and demonstrates that alternative, more suitable and deliverable lands—such as those under the control of the applicant—should be considered in order to ensure that housing need within Rostrevor can be effectively and sustainably met.



**Figure 1:** Site Location

– Counter Representation

2. Position Summary

2.1 The summary of our position is as follows:

- The Plan Strategy identifies a housing land supply of 119 units in Rostrevor, which significantly exceeds the identified NIHE social housing need of 45 units.
- However, a substantial proportion of this supply is derived from zoned and uncommitted sites, many of which have remained undeveloped since the previous development plan (2015), raising concerns regarding their deliverability.
- The Plan Strategy provides no detailed assessment of the availability, viability or constraints affecting these sites, nor any evidence that they will come forward within the plan period.
- As a result, the identified housing supply is theoretical rather than demonstrably deliverable, and may not realistically meet housing need in practice.
- The strategy is therefore overly reliant on existing land within the settlement limit, without providing flexibility or alternative sources of supply should these sites fail to deliver.
- This approach fails to ensure a robust, realistic and flexible housing strategy at settlement level.

Tier	Settlement	Indicative Housing Allocation
City/Main Town	Newry	2,688
	Downpatrick	1,824 (2,235*)
Total 38%*		4,512 (4,923*)
Local and Small Towns	Newcastle	468
	Warrenpoint/Burren	665
	Kilkeel	720
	Ballynahinch	676 (1,103*)
	Saintfield	55
	Killyleagh	179
	Castlewellan	44
Crossmaglen	263	
Total 27%*		3,070 (3,497*)
Villages	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	
Total 16%*		2,032**
Small Settlements 6%*		725
Total (all Settlements)		10,339 (11,177*)
Countryside 13%*		1,686
Total (inc Phase 2)		12,025 (12,863*)

Figure 2: HS1 Indicative Strategic Housing Land Allocation 2020-2035

- The evidence base underpinning the housing land supply is insufficiently tested in terms of deliverability and timing, and does not adequately consider reasonable alternatives. 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.

## – Counter Representation

### 3. 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 **119** units in Rostrevor, comprising:

- 8 completed dwellings
- 29 units under construction
- 15 units with extant planning permission (not commenced)
- 67 units on uncommitted zoned land

3.4 Whilst this headline figure suggests a significant level of housing supply, the composition of this supply varies considerably in terms of certainty and deliverability.

3.5 In particular, a substantial proportion of the identified supply (**82 units**) is derived from sites that are either unimplemented or uncommitted. These sites have not been subject to any detailed assessment in respect of: Availability Viability and Site-specific constraints

3.6 Furthermore, a number of these sites have remained undeveloped since the previous development plan (2015), raising concerns regarding their likelihood of delivery within the plan period.

3.7 In the absence of any clear evidence demonstrating that these sites will come forward, the identified housing land supply must be considered theoretical rather than demonstrably deliverable.

3.8 No non-implementation allowance has been applied to reflect the risk that some sites may not be delivered, nor has any alternative or contingency supply been identified.

## – Counter Representation

Settlement	Completions 2020-23	Committed Sites (Live Planning Approval)		Uncommitted Zoned sites		Urban Capacity Type 1 & Windfall		Potential (excl. completions)	Total Potential (incl. completions)
		Commenced	Not Commenced	Housing	Mixed Use	Type 1	Windfall		
City/Main Town Tier									
Newry	412	403	737	753		257	126	2,276	2,688
Downpatrick	173	201	77	1,151 (411)		168	54	1,651 (2,062)	1,824
<b>Sub Total</b>	<b>585</b>	<b>604</b>	<b>814</b>	<b>1,904 (2,315)</b>		<b>425</b>	<b>180</b>	<b>3,927 (4,338)</b>	<b>4,512 (4,923)</b>
Towns Tier									
Newcastle	86	82	102	96		63	39	382	468
Warrenpoint/ Burren	41	65	93	397		19	50	624	665
Kilkeel	31	108	54	347	22	106	52	689	720
Ballynahinch	85	41	271	168 (427)		68	43	591 (1,018)	676 (1,103)
Saintfield	7	7	4	32			5*	48	55
Killyleagh	13	34	54	66			12*	166	179
Castlewellan	15	14	2	10			3*	29	44
Crossmaglen	24	105	13	97			24*	239	263
<b>Sub Total</b>	<b>302</b>	<b>456</b>	<b>593</b>	<b>1,213 (1,640)</b>	<b>22</b>	<b>256</b>	<b>228</b>	<b>2,768 (3,195)</b>	<b>3,070 (3,497)</b>
Village Tier									
Bessbrook	1	4	24	0	272			300	301
Rostrevor	8	29	15	67				111	119
Annalong	75	18	29	49				96	171
Crossgar	7	1	10	105				116	123
Ardglass	24	216	108	0				324	348
Dundrum	5	0	2	0				2	7
Hilltown	34	13	15	12				40	74
Drumaness	1	14	1	71				86	87
Camrrough	3	22	14	41				77	80
Mayobridge	16	3	1	19				23	39
Killough	47	16	12	0				28	75

Figure 3: Housing Land Supply

## 4. Housing Need

4.1 NIHE data identifies a projected social housing need of 44 units in Rostrevor over the 5-year period (NIHE Commissioning Prospectus 2024–2027).

4.2 The Plan Strategy identifies a total housing land supply of 119 units, comprising all housing tenures.

4.3 Whilst this comparison suggests a numerical surplus when total housing supply is measured against social housing need alone, the two figures are not directly comparable, as the NIHE figure relates only to social housing need and does not capture wider housing demand.

4.4 Furthermore, the delivery of social housing is dependent on the availability of suitable and deliverable sites. The Plan Strategy does not identify how or where this identified need will be met within Rostrevor.

4.5 As set out above, a significant proportion of the identified supply is uncertain in terms of delivery. In the absence of clear evidence that these sites will come forward, it cannot be concluded that housing need will be met in practice.

Settlement	Total 5 Year Projection
Newry City	508
Downpatrick	222
Annalong/Longstone/Glassdrumman	18
Ardglass	38
Ballynahinch	95
Bessbrook/Derramore	100
Camrrough	26
Castlewellan	115
Crossgar	64
Crossmaglen	63
Cullaville	13
Drumaness	18
Dundrum/Seaforde/Clough	33
Forkhill	19
Hilltown	40
Kilkeel	78
Killough	16
Killyleagh	44
Mayobridge	14
Meigh	24
Mullaghbawn	12
Newcastle	244
Newtownclohogue	22
<b>Rostrevor</b>	<b>44</b>
Saintfield	58
Strangford	22
The Commons/Ballyholland	14
Warrenpoint	211
Remaining Settlements (need <10)	59
<b>Total</b>	<b>2,234</b>

Figure 4: NIHE Projected (5 Year) Social Housing Need 2023-2028

## – Counter Representation

**4.6** Accordingly, the Plan Strategy does not provide a robust or realistic basis to ensure that identified housing need will be delivered within the settlement.

### 5. Reliance on Headline Housing Supply

**5.1** The Council's evidence base indicates that overall housing supply across the district exceeds the identified housing requirement. At a settlement level, Rostrevor is identified as having a total housing land supply of **119 units**, which exceeds the identified social housing need.

**5.2** However, this headline figure does not reflect the composition, quality or deliverability of the identified supply. As set out in Section 3, a substantial proportion of this supply is derived from:

- Uncommitted zoned sites; and
- Sites with planning permission that have not been implemented

**5.3** In particular, **82 of the 119 units** comprise either uncommitted or non-implemented sites. The Plan Strategy does not provide any detailed assessment of:

- The availability of these sites
- Their viability or market attractiveness
- Site-specific constraints affecting delivery

**5.4** Furthermore, a number of these sites have remained undeveloped over a prolonged period, including since the previous development plan (2015). This raises legitimate concerns regarding whether they will be delivered within the plan period.

**5.5** The Plan Strategy assumes that all identified sites will come forward and contribute fully to housing supply. However, no non-implementation allowance has been applied, nor has any contingency or alternative supply been identified should these sites fail to deliver.

**5.6** Accordingly, the apparent adequacy of housing supply masks a significant degree of uncertainty. The Plan Strategy has not demonstrated that housing land within Rostrevor is:

- Available
- Deliverable
- Capable of meeting identified need within the plan period

**5.7** As a result, the strategy relies on a theoretical housing supply, rather than a robust and deliverable one. This creates a clear risk that housing need will not be met in practice within the settlement.

**5.8** The Plan Strategy therefore fails to ensure that housing land supply is realistic, deliverable and appropriately evidenced, contrary to soundness tests CE2 (robust evidence base) and CE3 (effective implementation).

## – Counter Representation

### 6. Failure to Consider Alternative Growth Scenarios

**6.1** 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.

**6.2** There is no clear evidence that alternative growth scenarios have been considered, including:

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

**6.3** In particular, there is no evidence that the Council has tested whether the identified housing land supply at settlement level, including in Rostrevor, is sufficient, appropriate or deliverable under different growth assumptions.

**6.4** This is especially relevant where, as set out above, a significant proportion of the identified supply is uncertain in terms of delivery.

**6.5** The failure to consider reasonable alternatives or to test the robustness of the housing strategy under different scenarios indicates that the Plan Strategy is not founded on a sufficiently robust or evidence-based approach.

**6.6** Accordingly, the Plan Strategy fails to meet the requirements of soundness test CE2.

### 7. Evidence Base and Changing Conditions

**7.1** The Strategic Housing Market Analysis (SHMA) underpinning the Plan Strategy is based on data primarily drawn from the period 2020–2022.

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

- Increased house prices
- Rising private rents
- Worsening affordability

**7.3** These changes are likely to have increased housing demand across all tenures, including both market and affordable housing.

**7.4** There is no clear evidence that these changing conditions have been reflected in either:

- The overall housing requirement; or
- The assessment of housing need and supply at settlement level, including in Rostrevor

## – Counter Representation

**7.5** This is particularly relevant where, as set out above, the Plan Strategy relies on assumptions regarding the delivery of existing housing land supply.

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

### 8. Constraints Affecting Delivery of Identified Housing Land

**8.1** As set out in the preceding sections, the Plan Strategy identifies a significant level of housing land supply within Rostrevor, much of which is derived from existing zoned or uncommitted sites.

**8.2** In order to assess the robustness of this supply, it is necessary to consider the extent to which these sites are available, suitable and deliverable within the plan period.

**8.3** A review of a number of the identified sites indicates that there are constraints and dependencies which may affect their ability to come forward for development.

**8.4** The following section highlights an example of such a site, demonstrating that the assumed housing supply may not be realised in practice.

#### RR04 – Warrenpoint Road

**8.5** As depicted in figure 5 below, the site identified as **RR04 (Warrenpoint Road)** was zoned for housing in the Banbridge / Newry and Mourne Area Plan 2015 and continues to form part of the housing land supply relied upon by the current Plan Strategy.

**8.6** Despite this long-standing allocation, there is no evidence that the site has been brought forward for development, raising concerns regarding its deliverability within the current plan period.

**8.7** The key site requirements attached to this zoning identify a number of constraints which may affect delivery. In particular:

- A requirement for a minimum of 28 social housing units, which may impact viability and delivery mechanisms
- A requirement to protect vegetation adjacent to the Ross Monument (**HB16/06/056**), a Grade A listed structure, indicating sensitivity in respect of its setting
- A requirement for access from Warrenpoint Road, including the need for land outside the site to be made available to achieve appropriate access and sightlines

**8.8** The requirement for third-party land to facilitate access introduces a significant uncertainty, as delivery is dependent on land outside the control of the site promoter.

## – Counter Representation

**8.9** Furthermore, the presence of a Grade A listed monument adjacent to the site is likely to impose constraints on layout, density and design, potentially affecting the overall development capacity.

**8.10** These factors raise legitimate concerns regarding the availability, viability and deliverability of the site.

**8.11** Notwithstanding this, the Plan Strategy assumes that the site will contribute fully to housing supply, without any updated or detailed assessment of whether these constraints have been resolved.

**8.12** This demonstrates that the identified housing land supply is not based on a sufficiently robust or realistic assessment of deliverability, contrary to soundness tests CE2 and CE3.

**8.13** Planning history associated with the site further reinforces concerns regarding deliverability. Records indicate that applications for residential development were submitted in the early 2000s, including proposals for both small-scale and larger housing schemes.

**8.14** Notwithstanding these proposals, the site remains undeveloped. This indicates that, despite a long-standing allocation and previous developer interest, the site has not come forward over a prolonged period.

**8.15** This lack of delivery suggests that there may be underlying constraints relating to viability, access, ownership or site-specific factors which have not been resolved.

**8.16** The continued reliance on this site within the housing land supply, without any clear evidence that these issues have been addressed, further undermines the assumption that it will contribute to housing delivery within the plan period.

**8.17** In addition, reference to the NI Direct Flood Maps indicates that areas of flood risk are present in proximity to the site, particularly associated with the adjacent watercourse.

**8.18** While the majority of the site itself appears to lie outside the primary fluvial flood extent, areas of flood risk are evident in the vicinity of the site access from Warrenpoint Road.

**8.19** This has the potential to constrain or complicate the provision of safe and suitable access, which is already identified as a key requirement of the site and dependent on third-party land.

**8.20** Taken together, these constraints indicate that the contribution of this site to housing supply is uncertain and should not be relied upon without a robust reassessment of its deliverability..

## – Counter Representation

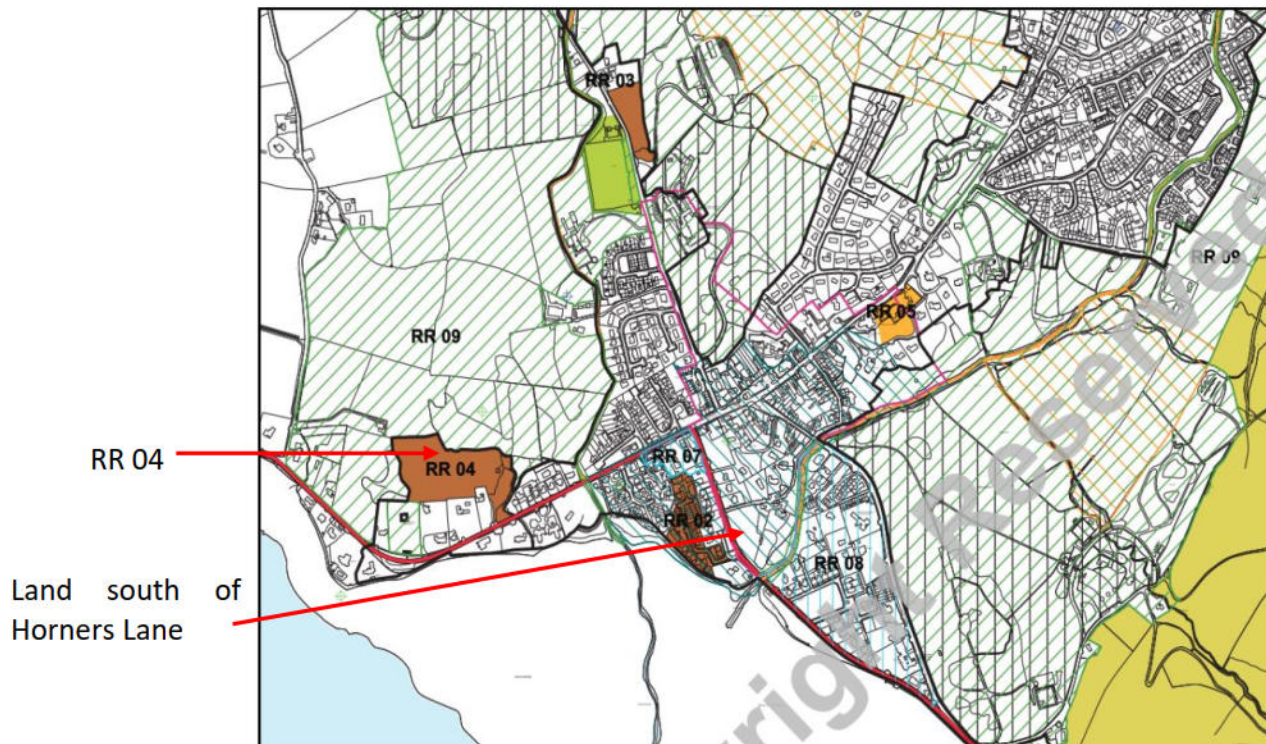


Figure 5: Extract from the Banbridge/ Newry & Mourne Area Plan 2015 Map No. 3/18 – Rostrevor

### Site – South of Horners Lane (Flood Risk Constraint)

**8.21** In addition to zoned sites, the Plan Strategy relies on windfall and urban capacity opportunities within the settlement, including areas of land located within the existing built-up area.

**8.22** One such area, located within the central part of Rostrevor (as identified above in **figure 5**), is situated within a predominantly residential context and would, in principle, represent a potential opportunity for redevelopment.

**8.23** However, reference to the NI Direct Flood Maps indicates that this area is subject to significant fluvial flood risk, with much of the site falling within the identified floodplain associated with the adjacent watercourse.

**8.24** The presence of flood risk is likely to:

- Constrain the developable area of the site
- Require mitigation measures
- Affect viability and design
- Potentially restrict development altogether, depending on policy application

– Counter Representation

8.25 As such, while the site may contribute in a limited capacity, it cannot be relied upon as a certain or significant source of housing delivery.

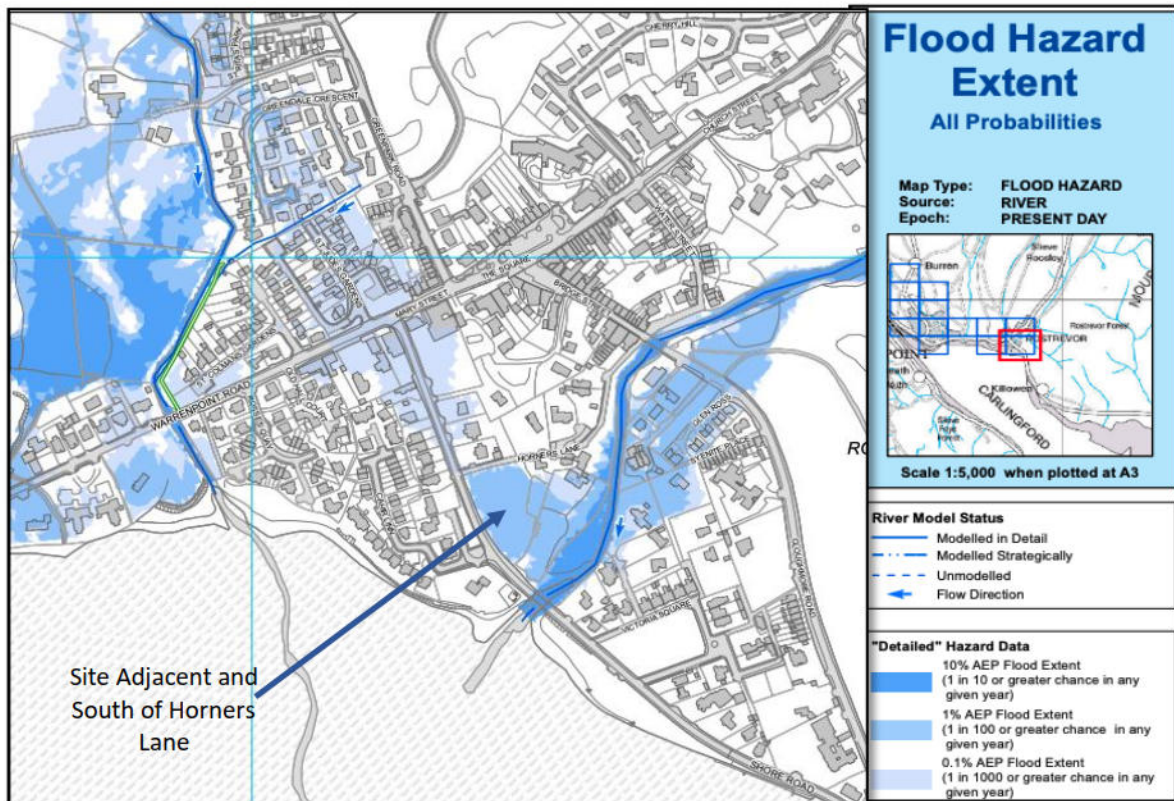


Figure 6: Extract from the NI Flood Maps – Map Sheet 27711SW

8.26 This further demonstrates that the Plan Strategy’s reliance on existing land within the settlement, including windfall and infill opportunities, may overestimate the realistic level of housing supply.

9. Alternative Deliverable Land Within Rostrevor

9.1 Notwithstanding the Council’s reliance on existing zoned and committed sites to meet housing need within Rostrevor, there are alternative landholdings within and immediately adjacent to the settlement which present a more realistic and deliverable opportunity for housing development.

9.2 This representation relates to lands under the control of the applicant, located immediately adjacent to the defined settlement development limit of Rostrevor. The lands are situated within an established residential context, bounded by existing housing to the east and south, including Cherry Hill and surrounding residential areas.

9.3 The subject lands occupy a highly sustainable and accessible location, forming a natural extension to the existing settlement. The site is well related to the built form of Rostrevor and

## – Counter Representation

would represent a logical and coherent rounding-off of the settlement, rather than an isolated or sporadic incursion into the countryside.



**Figure 7:** Map showing site location of the Subject lands just North of Cheery Hill Housing Development – Area Outlined in Red

**9.4** The surrounding pattern of development demonstrates that the area is already characterised by residential use, with the site forming part of a contained and visually associated land parcel. Development of these lands would therefore integrate seamlessly with the existing urban structure.

**9.5** As depicted in **figure 7a** below, Access to the lands can be readily achieved via the established road network, including through Cherry Hill to the south-west. Importantly, the delivery of the site does **not** rely on the acquisition of third-party land, nor does it require complex infrastructure interventions to facilitate development.



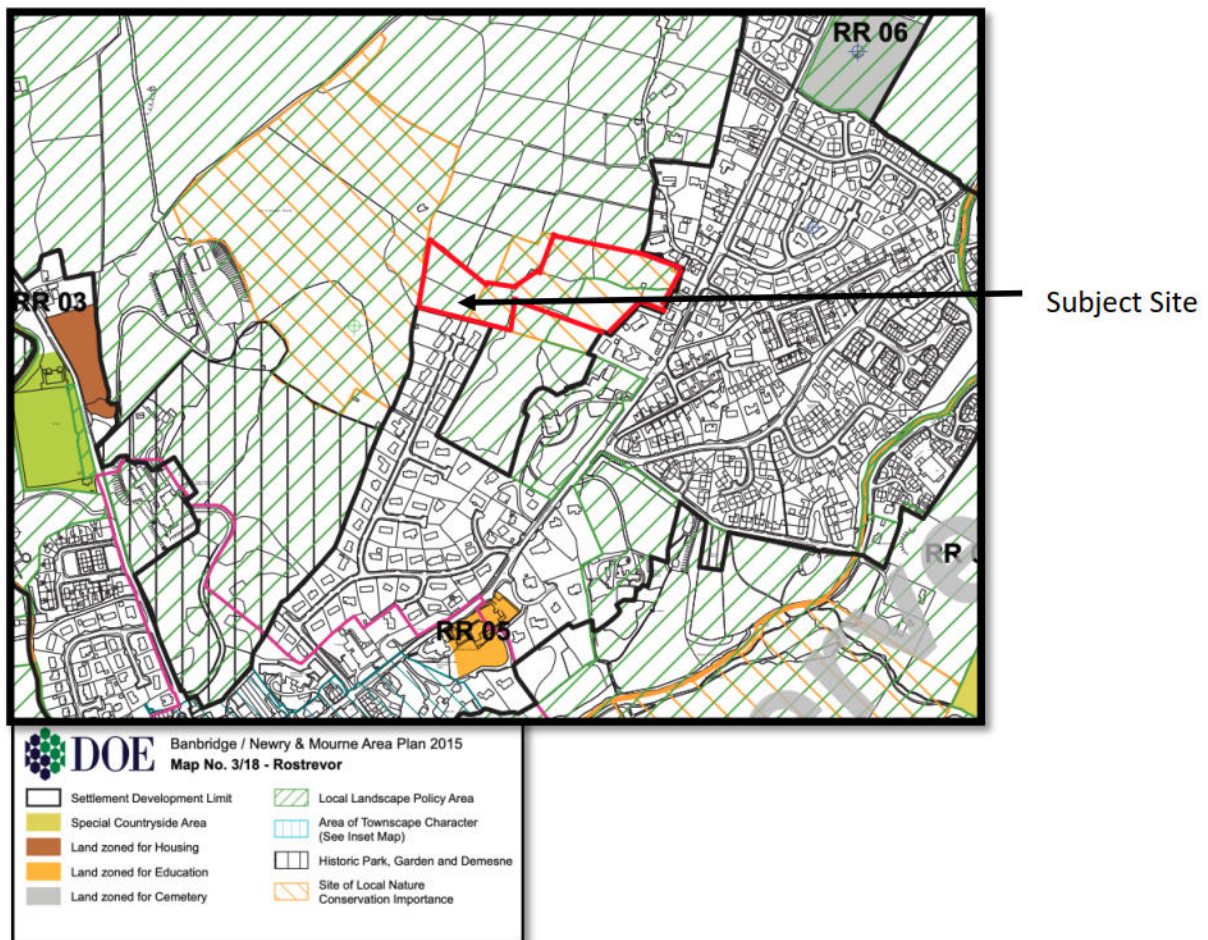
**Figure 7a:** Google Street View showing the potential entrance to the Subject Site through the North end of Cheery Hill estate in Rostrevor

## – Counter Representation

9.6 This is a significant material consideration when compared to other lands within the settlement which are subject to access constraints or dependency on external land ownership, thereby introducing uncertainty regarding deliverability.

9.7 The subject lands are not located within identified areas of significant fluvial flood risk and are not subject to the same level of constraint affecting other lands within the settlement, particularly in respect of access.

9.8 It is acknowledged that the lands are partially subject to environmental and landscape designations, including areas identified as a **Local Landscape Policy Area (LLPA)** and a **Site of Local Nature Conservation Importance (SLNCI)** within the Banbridge/Newry and Mourne Area Plan 2015.



**Figure 8:** Extract from the Banbridge/ Newry & Mourne Area Plan 2015 Map No. 3/18 – Rostrevor showing land designations.

9.9 However, such designations do not represent an absolute constraint to development. Rather, they require that development proposals are appropriately designed to respect the landscape character and ecological value of the site.

9.10 In this regard, any future development could be sensitively planned to:

## – Counter Representation

- Retain and integrate existing landscape features and vegetation
- Avoid or minimise impacts on areas of ecological importance
- Provide appropriate buffer zones and green infrastructure
- Ensure that development is directed to the least sensitive and most suitable parts of the site

**9.11** It is therefore considered that these designations can be appropriately managed through the development management process and do not preclude the delivery of housing on suitable portions of the lands.

**9.12** In contrast, other sites within Rostrevor — including lands zoned under the Banbridge/Newry and Mourne Area Plan 2015 (e.g. RR04, Warrenpoint Road) — remain undeveloped despite being identified for housing for a prolonged period.

**9.13** Evidence indicates that such sites are subject to a range of constraints which have hindered delivery, including:

- Requirements for third-party land to achieve access and sightlines
- Proximity to sensitive heritage assets, including the Grade A listed Ross Monument
- Environmental and landscape considerations
- Areas of flood risk affecting access and site viability

**9.14** Planning history further demonstrates that attempts have been made to bring forward development on these lands, including applications dating back over 20 years, which have not resulted in delivery. This calls into question the availability and effectiveness of these sites in contributing to housing supply.

**9.15** The subject lands are capable of accommodating residential development within the plan period and could contribute to meeting a range of housing needs, including market, affordable, and potentially social housing provision.

**9.16** Given the identified social housing need within the Rostrevor area, it is essential that the Plan Strategy identifies sites which are capable of being delivered in practice, rather than relying on theoretical capacity within constrained or undelivered lands.

**9.17** In summary, the subject lands represent:

- A sustainable and logical extension to the existing settlement
- A site that is free from critical delivery constraints, particularly in respect of access and ownership
- A deliverable opportunity within the plan period
- A more reliable alternative to existing zoned lands which have demonstrably failed to come forward

**9.18** Accordingly, the Plan Strategy should be amended to place greater emphasis on the identification of deliverable, unconstrained and appropriately located land, such as the subject site, in order to ensure that housing need within Rostrevor can be effectively met.

## – Counter Representation

### 10. Sustainable Development

**10.1** The current Plan Strategy approach relies on existing zoned and committed land within Rostrevor to meet housing need. However, as demonstrated, a number of these sites have not been delivered over a prolonged period and are subject to constraints which limit their realistic contribution to housing supply.

**10.2** In the absence of a sufficient supply of deliverable land within the settlement, there is a clear risk that housing need will instead be met through development in the open countryside.

**10.3** Such an outcome would represent a less sustainable form of development when compared to the provision of housing:

- Within established settlements;
- Accessible to existing services, facilities and infrastructure;
- Integrated with the existing community and built form.

**10.4** The subject lands represent a sustainable alternative, being located immediately adjacent to the settlement limit and within an established residential context. Development of these lands would support a compact urban form and avoid the need for dispersed countryside housing.

**10.5** Accordingly, the identification of deliverable and unconstrained land at appropriate locations, such as the subject site, would represent a more sustainable planning response.

**10.6** The current approach is therefore contrary to the Strategic Planning Policy Statement, which requires a sufficient and flexible supply of housing land (C3), and inconsistent with the Regional Development Strategy, which seeks to ensure an adequate, sustainable and deliverable supply of housing (C1).

### 11. Required Change

**11.1** In light of the issues identified, it is respectfully requested that the Plan Strategy be amended to ensure that housing supply within Rostrevor is based on a realistic and deliverable assessment of available land.

**11.2** In particular, the Plan Strategy should:

- a) Review the housing land supply within Rostrevor, with specific regard to the deliverability of existing zoned and committed sites
- b) Reduce reliance on sites which have not come forward, despite long-standing zoning and previous planning applications

## – Counter Representation

c) Ensure that sufficient land is identified to meet housing need, including social housing requirements and wider housing demand

d) Introduce greater flexibility in housing supply, to allow for changing circumstances and site-specific constraints

e) Recognise the role of sustainable settlement expansion, including the contribution of deliverable land adjacent to the settlement limit, where it represents a logical and integrated extension

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## 12. Conclusion

**12.1** The evidence presented demonstrates that, while the Plan Strategy identifies an overall housing allocation for Rostrevor, this is heavily reliant on sites which have not been delivered and are subject to a range of constraints.

**12.2** As such, the Plan Strategy:

- Relies on theoretical capacity rather than deliverable supply (CE2)
- Fails to ensure that housing land is available and capable of being delivered (CE3)
- Does not provide sufficient flexibility to respond to changing circumstances (CE4)

**12.3** Furthermore, the failure to identify alternative deliverable land within or adjacent to the settlement risks undermining the ability of Rostrevor to accommodate housing need in a sustainable manner.

**12.4** The subject lands represent a realistic, sustainable and deliverable opportunity to contribute to housing supply within Rostrevor, without the constraints affecting other sites relied upon in the Plan Strategy.

**12.5** Accordingly, a revised approach is required to ensure that the Plan Strategy:

- Reflects a robust and realistic assessment of housing land supply
- Identifies deliverable sites in appropriate locations
- Ensures that housing need can be met in a sustainable and effective manner

**12.6** In the absence of such amendments, the Plan Strategy fails to meet the relevant tests of soundness and cannot be considered sound.



## 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

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.

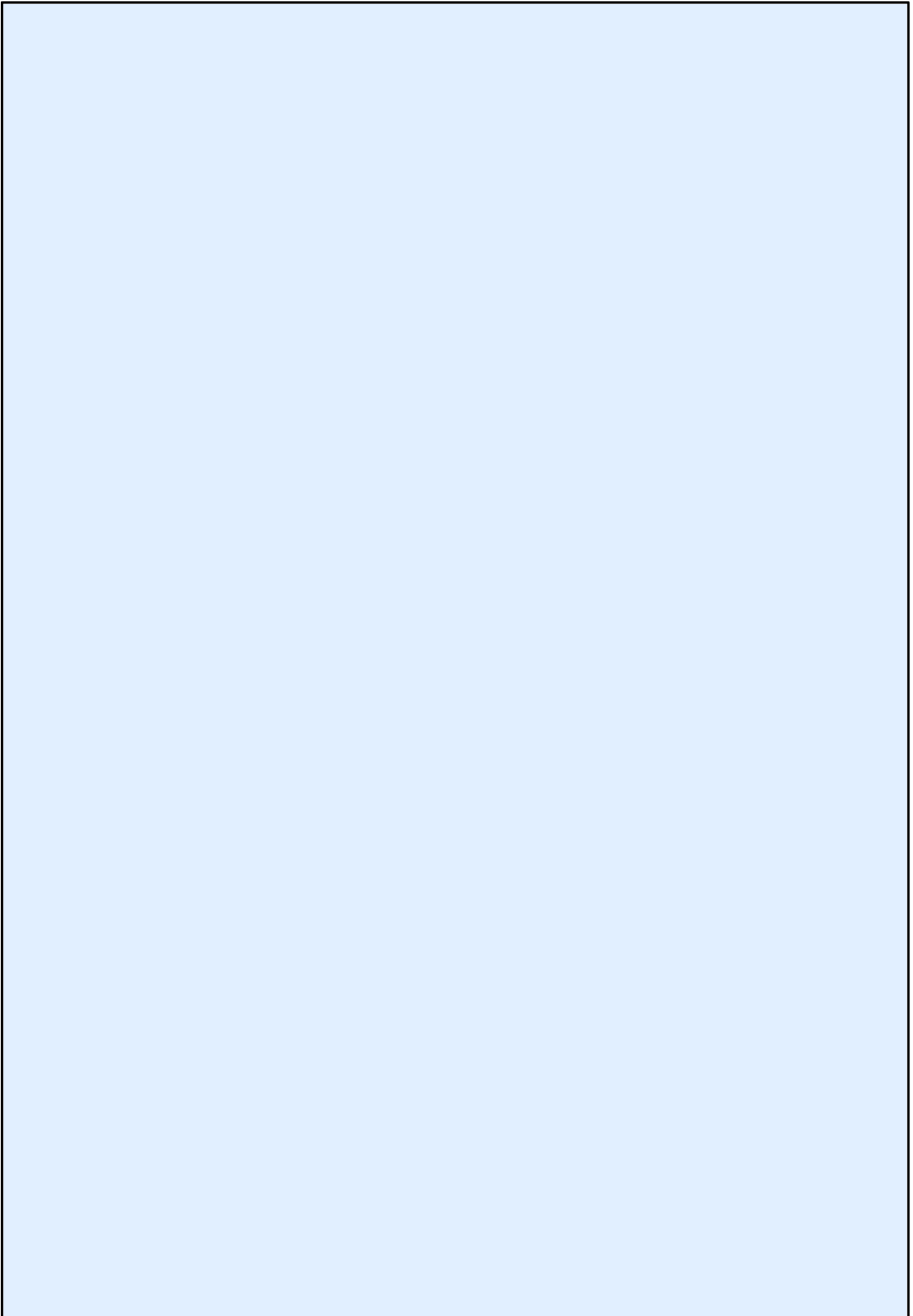
**A counter representation must not propose any further changes to the draft Plan Strategy.**

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.



*(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

Date