

Dear Sir/Madam,

Please see attached

Regards

[REDACTED]

[REDACTED]

**Alpha Housing**

Alpha House | 6 Edgewater Road | Belfast | BT3 9JQ

Tel: 028 90787750

Mobile: [REDACTED]

E mail: [REDACTED]

Web: [www.alphahousingni.org](http://www.alphahousingni.org)



SUBJECT TO CONTRACT  
WITHOUT PREJUDICE

## 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.

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.

The points made by the submission NMD-DPS-098 from O’Cualann Irish Co-Housing Association highlight the need to support both rural social housing as well as rural affordable housing for sale. Hence I agree that O’Cualann’s representation on a separate limit of 20 for social housing and a separate limit of 20 for affordable housing for sale be included in the new policy. A separate limit could be set for Social Housing separately from Affordable Housing for Sale and/or rent, with each type of affordable home getting a development limit under the policy.

I would also like to support 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 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 need exists. We do not want to block the social need if there is also an intermediate need.

*(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