

# **Plean Forbartha Áitiúla 2035** **Dréacht-Straitéis an Phlean** **Local Development Plan 2035** **Draft Plan Strategy**

**Forlónadh Teicniúla 2 – Tithíocht**  
**Meitheamh 2025**

**Technical Supplement 2 - Housing**  
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## **1.0 Introduction**

### **Purpose of this document**

- 1.1 The purpose of this technical supplement is to bring together the evidence base that has been used to inform the preparation of the Newry, Mourne and Down District Council's Local Development Plan (LDP) draft Plan strategy. It forms one of the subject based technical supplements that should be read alongside the Plan Strategy document to provide justification for the policies proposed therein.
- 1.2 This builds on LDP Position Paper 2 Housing (November 2014) and Position Paper 16 Housing Allocation (January 2018) and formed part of the evidence base for the Preferred Options Paper (POP).
- 1.3 This technical supplement provides an overview of the regional and local planning policy context, the district profile of Newry, Mourne and Down District Council in respect of housing and details the evidence base underpinning and informing the Housing Strategy and operational policies.

## 2.0 Policy Context

### Regional Policy Context

#### **Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'**

- 2.1 The NI Executive has set out its priorities in the Programme for Government (PfG) 2024-2027. The programme lists the immediate priorities which the government will work to throughout the duration of the mandate. One of these priorities is to provide more social, affordable and sustainable housing.

#### **Regional Development Strategy 2035 (RDS)**

- 2.2 The RDS 2035 sets policy directions for the provision of housing that aim to deliver development in a more sustainable manner. This means growing the population in the Hubs by providing additional housing (SFG 12) and sustaining rural communities living in smaller settlements (i.e. smaller towns and villages) and the open countryside (SFG 13). It also provides Regional Guidance for housing development:
- Regional Guidance 6(RG6) seeks to strengthen community cohesion through fostering a stronger community spirit and sense of place and encouraging mixed housing development.
  - Regional Guidance 7(RG7) seeks to support urban renaissance by encouraging and bringing forward under-utilised land and buildings, particularly for mixed use development and promoting regeneration in areas of social need
  - Regional Guidance 8(RG8) highlights the need to manage housing growth to achieve sustainable patterns of residential development including promoting more sustainable housing development within existing urban areas, ensuring an adequate and available supply of quality housing to meet the needs of everyone, and using a broad framework to assist judgements on the allocation of housing growth.
- 2.3 The RDS emphasises a sustainable approach to housing growth, setting of a regional target of 60% of new housing to be located in appropriate "brownfield" sites within the urban footprints of settlements greater than 5000 population (RG 8). Within the district there are 6 settlements which have a population greater than 5,000 - Newry City, Downpatrick, Newcastle, Kilkeel, Warrenpoint/Burren and Ballynahinch. Brownfield land may encompass vacant or derelict land, infill sites and land occupied by redundant or underused buildings.

- 2.4 The RDS provides an estimate of the new dwelling requirement for the district as a guide for the preparation of the LDP through a Housing Growth Indicators 2008-2025. In September 2019, the Department for Infrastructure published a revised HGI figure of 10,000 dwellings for the Newry, Mourne and Down District for the period 2016-2030, using 2016 based household projections.

### **Strategic Planning Policy Statement 2015 (SPPS)**

- 2.5 The regional strategic objectives for housing in settlements, consistent with regional guidance in the RDS, are to:
- Manage housing growth to achieve sustainable patterns of residential development;
  - Support urban and rural renaissance; and
  - Strengthen community cohesion.
- 2.6 The SPPS also states that in preparing LDPs councils shall bring forward a strategy for housing, together with appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the plan area. Planning authorities must deliver:
- Increased housing density without town cramming;
  - Sustainable forms of development;
  - Good design; and
  - Balanced communities.
- 2.7 LDPs are required to provide for a managed release of housing land, in line with a plan, monitor and manage approach to ensure that, as a minimum, a five year supply of housing land within settlements over 5,000 population in the interests of sustainable development and achieving compact urban forms. The SPPS indicates that housing allocations in LDPs should be informed by:
- RDS Housing Growth Indicators (HGIs);
  - Use of the RDS housing evaluation framework (HEF);
  - Allowance for existing commitments;
  - Urban capacity studies;
  - Allowance for windfall housing;
  - Housing Needs assessment (HNA)/Housing Market Analysis (HMA); and
  - Transport Assessments.
- 2.8 In relation to Housing in the Countryside, the SPPS sets policy objectives aimed at:



- Managing growth to achieve appropriate and sustainable patterns of development which support a vibrant rural community;
- Conserving the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
- Facilitating development which contributes to a sustainable rural economy; and
- Promoting high standards in the design, siting and landscaping of development.

### **Planning Policy Statement (PPS) 7: Quality Residential Environments (2001)**

2.9 This document sets out regional planning policy for achieving quality in new residential development. The main objectives as set out in the policy statement are as follows:

- To promote an integrated approach to achieving sustainable and quality residential environments;
- To promote quality residential environments that:
  - Creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe convenient, adaptable and easy to maintain;
  - Respects and enhances features of value and local character and promotes biodiversity; and
  - Reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality.
- To promote comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality.
- To ensure that adequate provision is made for infrastructure and appropriate neighbourhood facilities as an integral part of residential development.

### **Planning Policy Statement (PPS) 7 (Addendum): Residential Extensions/ Alterations (2008)**

2.10 This document sets out additional planning policy for the extension and/or alteration of a dwellinghouse or flat, including those in multiple occupancy. It seeks to promote high quality design in residential extensions and alterations as well as ensuring the character of the original property and local area are respected.

### **Planning Policy Statement (PPS) 7 (Addendum): Safeguarding the Character of Established Residential Areas (2010)**

- 2.11 This addition to PPS7 provides additional planning policy for the protection of local character, environmental quality and residential amenity within established residential areas. It seeks to ensure that new residential schemes are sensitive in design terms to people living in existing neighbourhoods and are in harmony with the local character of established residential areas.

### **Planning Policy Statement (PPS) 12 - Housing in Settlements (2005)**

- 2.12 This PPS sets the following policy objectives:
- To manage housing growth in response to changing housing need;
  - To direct and manage future housing growth to achieve more sustainable patterns of residential development;
  - To promote a drive to provide more housing within existing urban areas;
  - To encourage an increase in the density of urban housing appropriate to the scale and design to the cities and towns of Northern Ireland; and
  - To encourage the development of balanced local communities.
- 2.13 In relation to the development plan process this document highlights the processes for allocating housing while also detailing a number of planning control principles which should be applied to the planning and delivery of housing developments within settlements.

### **Planning Policy Statement 21: Sustainable Development in the Countryside (PPS21)**

- 2.14 This PPS sets the following policy objectives:
- to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community;
  - to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
  - to facilitate development necessary to achieve a sustainable rural economy; including appropriate farm diversification and other economic activity; and
  - to promote high standards in the design, siting and landscaping of development in the countryside.

- 2.15 The development plan process plays a key role in identifying the countryside assets and balancing the needs of rural areas and communities with protection of the environment. This is facilitated by the preparation of Countryside Assessments. (Further detail is set out in Technical Supplement 7 which contains an Environmental Assets Appraisal; a Landscape Assessment; a Development Pressure Analysis and a Settlement Appraisal.)

### **Supplementary Planning Guidance**

- 2.16 A range of Supplementary guidance produced by the Department of the Environment is relevant to the delivery of housing, this includes:
- Creating Places – Achieving Quality in Residential Development (2000);
  - DCAN8: Housing in Existing Urban Areas (2002);
  - Living Places: An Urban Stewardship and Design Guide for NI (2014); and
  - Building on Tradition – A Design Guide for the Northern Ireland Countryside (2012).

### **Local Policy Context**

#### **Existing Area Plans**

- 2.17 The two Local Development Plans which cover the district are the Banbridge, Newry and Mourne Area Plan 2015 and the Ards and Down Area Plan 2015. These contain a range of policies which relate to housing in settlements.

#### **Banbridge, Newry and Mourne Area Plan 2015**

- The Plan designated 45 settlements in Newry and Mourne, one hub, four local towns, 14 villages and 26 small settlements<sup>1</sup>.
- Within designated settlements in Newry and Mourne the total area of land allocated for housing is 294 hectares, with the potential to deliver 10,255 units.
  - Newry city received 131 hectares (44.6%);
  - Crossmaglen received 15.52 hectares (5.2%);
  - Kilkeel received 35.15 hectares (11.9%);
  - Newtownhamilton 2.73 hectares (0.9%); and
  - Warrenpoint/Burren 42.24 hectares (14.4%)
- Within the villages there was capacity for 2,250 dwellings
- 'HSG 2 Social Housing Allocation' outlines that land has been allocated for social housing on identified sites, through the imposition of Key Site Requirements.

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<sup>1</sup> Following local government boundary changes in 2015 four Banbridge settlements (Ballyward, Decomet, Finnis, and Leitrim) moved into the Newry, Mourne and Down District

- 'HSG 3 Protected Housing Areas in City and Town Centres' outlines that within designated areas, planning permission will not be granted for any development that results in a change of use from housing.

### **Ards and Down Area Plan 2015**

- The Plan designated 39 settlements in the Down District , three towns, 14 villages and 22 small settlements.
- Within designated settlements in the Down District the total area of land allocated for housing is 240 hectares:
  - Downpatrick 119 hectares (phase1, 49.6%) and 22.4 hectares (phase2, 9.3%);
  - Ballynahinch 68 hectares (28.3%); and
  - Newcastle 31 hectares (12.9%)
- Within the villages there was capacity for 2,500 dwellings.
- 'HOU 3 Protected Housing Areas' specifies that planning permission will not be granted for redevelopment or change of use within protected housing areas.

- 2.18 Both Plans recognise the benefits housing in settlements can provide, especially for the elderly and young people, those with disabilities and for those without cars who wish to live within walking distance of community and retail facilities.

### **Newry, Mourne and Down District Council's Corporate Plan 2024-2027**

- 2.19 The Corporate Plan sets out the Council's vision, mission and values. There are eight strategic objectives contained within the Plan, which are aligned to the five themes of the Community Plan. These are:
- Support the continued growth and development of our local economy.
  - Improve the health and wellbeing of everyone in the district.
  - Protect and enhance our environment to secure a sustainable future.
  - Support regenerative tourism opportunities which promote our culture, heritage and environment.
  - Empowering communities to play an active part in civic life.
  - Develop and revitalise our district.
  - Deliver sustainable services.
  - Represent the voice of the district with our partners.
- 2.20 As indicated above one of the strategic objectives of the Corporate Plan is to develop and revitalise our district. Ensuring that the district has safe and vibrant communities is fundamental to achieving this end goal and therefore

both the quantity and quality of housing remains a key driving force to ensuring this outcome.

- 2.21 The Corporate Plan also highlights the priorities that are important to the district's residents. Within this table reference is made to the need for more affordable good quality housing, improving people's health and well-being and providing greater support for the elderly and most vulnerable within our society.

### **Newry, Mourne and Down District Council's Community Plan 2030 'Living Well Together'**

- 2.22 The Community Plan is the overarching strategic plan for integrated planning and delivering of services in Newry Mourne and Down. It provides a framework for the strategies and plans the Council will put in place to contribute towards the outcomes in the community plan and it is based on a detailed analysis of future risks and opportunities for the district. The Plan was developed with engagement through four thematic working groups, each with a number of priority areas. The delivery of quality housing was a priority area identified through the Environment and Spatial Development working group.
- 2.23 The plan identifies 5 positive outcomes for the district one of which relates specifically to the issue of housing. The plan states that one of the intentions of the Plan is that all people in the district will benefit from a clean, quality and sustainable environment and identifies the level of quality housing as an indicator for measuring this outcome.
- 2.24 The community plan highlights a number of themes and areas of concern under the umbrella of housing including the need for family accommodation across all tenures alongside the requirement to consider dwellings to facilitate the elderly and smaller households.
- 2.25 The Community Plan also draws attention to the need for social housing across the district and identifies a number of settlements which have where the level of need is particularly high.

### **Cross Boundary Policy Context**

- 2.26 In considering the local policy context, it is important to take account of the three neighbouring councils in Northern Ireland and the two in the Republic of Ireland.

**Table 1: Neighbouring councils summary of planning position with regards to housing.**

<b>Neighbouring Council</b>	<b>Position</b>
Armagh Banbridge Craigavon Borough Council	<p>Published its Preferred Options Paper in March 2018.</p> <p><b>Key Issue SGS2 Housing Allocation</b> Council's Preferred Option 2A: <i>Focus housing growth on the hubs whilst sustaining rural communities to reflect regional direction.</i> This option directs the majority of the allocation to the main Hubs to grow their populations whilst sustaining rural communities. This option and the associated housing allocation is considered consistent with RDS regional policy direction.</p> <p><b>Key Issue SOC1 Supporting Quality Sustainable Urban Housing and Balanced Communities</b> Council's Preferred Option 1A: <i>An approach to new residential development in settlements in line with existing policies, tailored to reflect regional direction and to meet local circumstances.</i> The Council intends to bring forward a similar set of policies as contained in the existing suite of operational policy but with some adjustment to reflect the Council's wider approach to the urban area under other key issues (e.g. design and place-making and open space) and to build on the regional direction contained in the SPPS to best reflect local circumstances where appropriate.</p> <p><b>Key Issue SOC2 Supporting Sustainable Rural Housing</b> Council's Preferred Option 1A: <i>An approach to rural housing in line with existing policies ad further regional direction tailored to meet local circumstances.</i> To reflect the SPPS the Council does not propose to take forward a policy in relation to Dispersed Rural Communities as currently covered by CTY2 of PPS21. All other Policies CTY1 and 2a-16 will be carried forward with amendment as appropriate.</p>
Ards and North Down Borough Council	<p>Published its Preferred Options Paper in March 2019. It sets out a total of 42 Key Issues for the LDP and lists the Council's preferred options.</p> <p><b>Key Issue 3: Housing Allocation</b> Council's Preferred Option 3b: <i>Re-evaluate existing housing zonings and allocate housing land, if required, to ensure continued modest housing growth (using sequential approach in the SPPS).</i> When the total potential on zoned housing sites is combined with the potential development of dwellings in the countryside, it is estimated the housing growth within the Borough would be between 8,800-9,400. This would result in housing growth approximately 7-15% higher than the HGI of 8,190 new dwellings to 2030.</p> <p><b>Key Issue 6: Rural Housing</b> Council's preferred Option 6a: <i>Introduce an approach to rural housing in line with existing policies and regional direction, tailored to meet local circumstances.</i> This incorporates the policies included within the SPPS for housing development in the countryside, but with certain alterations to reflect the Council's wider approach to the rural area under other</p>

	<p>key issues (e.g. landscape designations and design) and to best reflect local circumstances where appropriate.</p> <p><b>Key Issue 7: Affordable Housing</b></p> <p>The Council's Preferred Option 7d: <i>The LDP will provide affordable housing through the use of the proportional approach, key site requirements or zoning of entire sites, dependent on a number of factors, including identified need.</i></p> <p>The preferred approach allows for the use of three different approaches to affordable housing provision in order to provide certainty and ensure contribution to the provision of balanced communities.</p> <p><b>Key Issue 8: Lifetime Homes</b></p> <p>The Council's Preferred Option 8a: <i>The LDP shall provide a proportion of Lifetime Homes in new developments.</i></p> <p>This would involve the introduction of a new strategic policy that would require a proportion of housing development sites, over a certain threshold to be built to Lifetime Homes standards. This would have benefits with regards to meeting the varied need of the community, providing high quality housing, securing sustainable housing and providing a better environment.</p>
<p>Lisburn and Castlereagh City Council</p>	<p>Published its Local Development Plan's adopted Plan Strategy in September 2023.</p> <p><b>Strategic Policy 08 Housing in Settlements</b></p> <p>Under this policy the Plan will support proposals that:</p> <ol style="list-style-type: none"> <li><i>Are in accordance with the strategic housing allocation</i></li> <li><i>Facilitate new residential development which reflects the surrounding context and promotes high quality design within settlements</i></li> <li><i>Promotes balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing</i></li> <li><i>Encourage compact urban forms appropriate densities while protecting the quality of the environment.</i></li> </ol> <p><i>Operational Policies:</i></p> <p><b>Housing in Settlements</b></p> <ul style="list-style-type: none"> <li><i>HOU1 New Residential Development</i></li> <li><i>HOU2 Protection of Land Zoned for Housing</i></li> <li><i>HOU3 Site Context and Characteristics of New Residential Development</i></li> <li><i>HOU4 Design in New Residential Development</i></li> <li><i>HOU5 Public Open Spaces in New Residential Development</i></li> <li><i>HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning</i></li> <li><i>HOU7 Residential Extensions and Alterations</i></li> <li><i>HOU8 Protecting Local Character, Environmental Quality and Residential Amenity in Established Residential Areas</i></li> <li><i>HOU9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments</i></li> </ul>



	<ul style="list-style-type: none"> <li>• <i>HOU10 Affordable Housing in Settlements</i></li> <li>• <i>HOU11 Specialist Accommodation</i></li> <li>• <i>HOU12 Accommodation for the Travelling Community</i></li> </ul> <p><b><i>Housing in the Countryside</i></b></p> <ul style="list-style-type: none"> <li>• <i>COU1 Development in the Countryside</i></li> <li>• <i>COU2 New Dwellings in Existing Clusters</i></li> <li>• <i>COU3 Replacement Dwellings</i></li> <li>• <i>COU4 The Conversion and Reuse of Buildings for Residential Use</i></li> <li>• <i>COU5 Affordable Housing</i></li> <li>• <i>COU6 Personal and Domestic Circumstances</i></li> <li>• <i>COU7 Dwellings for Non-Agricultural Business Enterprises</i></li> <li>• <i>COU8 Infill/Ribbon Development</i></li> <li>• <i>COU9 Temporary Caravan</i></li> <li>• <i>COU10 Dwellings on Farms</i></li> <li>• <i>COU15 Integration and Design of Buildings in the Countryside</i></li> <li>• <i>COU16 Rural Character and Other Criteria</i></li> </ul>
Louth County Council	<p>Louth County Development Plan 2021-2027 Development Plan was adopted by members in September 2021.</p> <p>The objectives for Housing are as follows:</p> <ul style="list-style-type: none"> <li>• <i>HOU1 - HOU7: Housing Strategy.</i></li> <li>• <i>HOU8: Vacant Site Levy.</i> <i>To promote the sustainable development of vacant residential and regeneration sites in all development centres in the County, as appropriate, in accordance with the requirements of the Urban Regeneration and Housing Act 2015 (as amended).</i></li> <li>• <i>HOU9: Regeneration Areas.</i> <i>To support and facilitate investment in areas and lands in the County identified for regeneration including those as set out on the Land Use Zoning Maps and to collaborate with landowners and stakeholders in the development of these lands.</i></li> <li>• <i>HOU10: Sustainable Neighbourhoods.</i> <i>To continue to support the creation of sustainable communities throughout the County for people across all the life stages by facilitating the strong creation of attractive neighbourhoods where there are links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised.</i></li> <li>• <i>HOU11: Town Centre Living.</i> <i>To encourage and support a range of appropriate uses in town and village centres that will assist in the regeneration of vacant and under-utilised buildings and land and will re-energise the town and village centres, subject to a high standard of development being achieved.</i></li> <li>• <i>HOU12: Housing for Older Persons.</i> <i>To support the provision of independent and/or assisted living for older persons such as purpose built</i></li> </ul>



	<p><i>accommodation, the adaptation of existing properties, and opportunities for older persons to avail of 'rightsizing' within their community at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</i></p> <ul style="list-style-type: none"> <li>• <i>HOU13: Specialist Housing.</i> <i>To support the provision of independent and/or assisted living for people with disabilities or mental health issues such as purpose built accommodation or adaptation the of properties. existing</i></li> <li>• <i>HOU14: Traveller Accommodation.</i></li> <li>• <i>To secure the implementation of the Louth County Council Traveller Accommodation Programme 2019-2024 and any subsequent programme prepared during the life of this Plan.</i></li> <li>• <i>HOU15: Densities.</i> <i>To promote development that facilitates a higher, sustainable density that supports compact growth and the consolidation of urban areas, which will be appropriate to the local context and enhance the local environment in which it is located.</i></li> <li>• <i>HOU16: Buildings of Height</i> <i>To support increased building heights in appropriate locations in the Regional Growth Centres of Drogheda and Dundalk..</i></li> <li>• <i>HOU17: Principles for Quality Design and Layout:</i> <i>To promote and facilitate the sustainable development of a high quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.</i></li> <li>• <i>HOU18 – HOU25: Creating a well designed place</i> <i>In achieving a well designed place there are a range of factors that need to be considered including: layout, form, scale and mass, visual appearance, hard and soft landscaping and finishes.</i></li> <li>• <i>HOU26-31 Dwelling Mix and Adaptable Homes:</i> <i>It is important for new residential areas to include an appropriate mix of house types to meet the needs of all tenures and age groups, including families, persons living alone and old persons.</i></li> </ul>
Monaghan County Council	<p>Prepared Draft Monaghan County Development Plan 2025-2031. The objectives for Housing are as follows:</p> <ul style="list-style-type: none"> <li>• <i>HSO1 – HSO12: Housing Strategy Objectives.</i></li> </ul> <p><i>Urban Residential Development Objectives:</i></p> <ul style="list-style-type: none"> <li>• <i>UDO1: To promote the towns as Residential centres and encourage the development of new residential accommodation on zoned residential lands.</i></li> <li>• <i>UDO2: To ensure there is sufficient zoned, serviceable land to meet the future housing needs of the towns as set out in the Chapter 2, Core Strategy, of the Monaghan County Development Plan 2025-2031.</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>UDO3: To provide directly, or in partnership with the voluntary or private sector, sufficient social and affordable housing to meet the needs of the area.</i></li> <li>• <i>UDO4: To encourage social integration and a mixture of tenures in all residential developments.</i></li> <li>• <i>UDO5: To encourage the refurbishment and reuse of derelict buildings and development on derelict lands and infill sites in the towns for residential developments which will result in the renewal and regeneration of towns.</i></li> <li>• <i>UDO6: To comply with Chapter 3, Housing Strategy, of the Monaghan County Development Plan 2025-2031.</i></li> <li>• <i>UDO7: To promote compact forms of residential development such as infill and back land development and ensure, through the development management process, that access points to back land areas are reserved or that adequate frontage is reserved to provide future road access, to enable comprehensive back land development.</i></li> </ul>

- 2.27 The Council has engaged and responded to neighbouring Councils POP's and draft Plan Strategies for Louth and Monaghan as they were published. The Council is also represented on a number of working groups to discuss cross-boundary issues, including the Development Plan Working Group.
- 2.28 The draft Plan Strategy was presented to neighbouring councils in a workshop on 9<sup>th</sup> April 2025, where representatives from the three neighbouring councils in the north were represented. A similar presentation was held online with the two neighbouring councils in Louth and Monaghan Councils on 8<sup>th</sup> April 2025. This involved discussion on the proposed Plan objectives, Strategic Policies and new operational policies, along with the consideration of shared cross-boundary issues. Further detail is outlined in the Neighbouring Council Consultation Report (see supporting documents to the draft Plan Strategy on the Council's website).
- 2.29 In consideration of neighbouring Council's development plan documents and discussions held with their officials, it is the opinion of this Council that no conflict is apparent with our draft Plan Strategy, insofar as it related to retail.

### 3.0 Preferred Options Paper

- 3.1 Publication of the Preferred Options Paper (POP) in June 2018 represented the Council's formal commencement of work on the preparation of a new local development plan (LDP) for the district. The purpose of the POP was to stimulate debate and encourage feedback to inform the development of the LDP. The POP set out the proposed vision and strategic objectives for the LDP along with 24 key strategic issues. For each key strategic issue, a range of options were set out and the Council's preferred option identified.
- 3.2 The POP identified five key issues (Key Issue 2,3,6,7 and 8) with alternative options relating to housing.

#### Key Issue 2 – Quantity of Housing Land

- 3.3 The Department of Infrastructure's original 2012 Housing Growth Indicators (published in April 2016) were used to inform the level of housing need set out in the POP under Key Issue 2. These HGI figures covered the period 2012-2025 (13 years) and were set at 10,900. The POP then projected this figure to the end of the Plan period, which was 2030 at that time. The adjusted figure for the 2012-2030, over an 18 year period was 15,092 or 838.4 per annum.

#### Options for Quantity of Housing Land

- Option 1 Retain the current level of zoned housing land.
- 3.4 The Council's preferred and only option was to retain the current level of zoned housing land:
- 'Provision from committed sites and zoned sites together with completed sites represents 96% of the district's HGI for the Plan period (excluding housing in the countryside). A full review of housing land including the potential for delivery will be undertaken. A phased approach to the release of housing land would be introduced with surplus zoned land held in reserve to meet long-term housing need.'*
- 3.5 Justification for this choice, as outlined in the POP was as follows: 'Option 1 is seen as a balanced approach that will ensure an orderly release of housing land without the need to de-zone land and the subsequent market uncertainty that this would bring. This option would also enable lands held in reserve to be brought forward should any subsequent review of the HGIs for the district result in an uplift to the HGI allocation.'

- 3.6 The Council's preferred and only option was to retain the current level of zoned housing land. The POP stated that provision from committed sites and zoned sites together with completed sites represented 96% of the district's HGI for the Plan period. It also highlighted that a full review of all housing land, including the potential for delivery would be undertaken.
- 3.7 The majority of the 208 public respondents had no comment to make on the quantity of housing land, however 49 submissions (24% of all public submissions) did address this issue. It was the view of some respondents that HGIs were for guidance and did not represent a cap on development. There was general consensus that the projected DfI HGI figure of 15,092 was too restrictive.
- 3.8 In terms of the quantity of housing in the countryside comments ranged from reducing the current level of housing in the countryside, to classifying all housing in the countryside as windfall which should be excluded from the HGI figure.
- 3.9 The majority of statutory consultees (11 submissions, 79% of all consultees) made no comment on the options provided. Those that did (3) had mixed comments, indicating support in part for the preferred option.
- 3.10 DfI Strategic Planning welcomed the review of housing land, however raised a number of queries:
- They queried whether additional land would be zoned in tandem with a phased approach which would see surplus land held as a long term reserve.
  - They advised that it was unclear what proportion of the potential housing provision was on zoned land not subject of planning permission.
  - They requested clarification on the housing supply target for the plan.
- 3.11 The NIHE supported the preferred option, and requested that existing uncommitted sites should be robustly tested for suitability, availability and deliverability.
- 3.12 The Quantity of Housing Land as set out under the POP has now been superseded due to the revised HGIs published in April 2028. The updated approach is now set out under Section 7.

### **Key Issue 3 – Distribution of Housing Land**

#### **Options for Distribution of Housing Land**

- Option 1 Based on current population distribution.
- Option 2 Based on RDS 60% target.

- Option 3 Balanced approach between options 1 and 2.

3.13 The Council's preferred Option was Option 3:

*'This would still focus development within settlements with a population of over 5,000, but at a lesser figure level than the 60% while recognising that there is a need to sustain villages and the countryside. The allocation to the countryside and villages is uplifted to maintain growth at current levels whilst a small reduction in the allocation to small settlements limits development opportunities to small scale development sites and infilling.'*

3.14 Justification for this choice, as outlined in the POP was as follows: 'Option 3 is considered to represent a balanced and sustainable approach. It strikes a balance between the need to promote the development of our city and towns in line with the RDS whilst recognising the need to support our rural communities. Whilst not fully meeting the RDS target of 60% development in hubs and towns over 5,000 population it makes significant progress towards this target. It also affords the opportunity to retain the majority of rural planning policy in its current form and so continue to deliver sustainable development in the countryside.'

3.15 The POP also set out two alternative options as follows:

Alternative Option 1 – based on current population distribution. Under this option each settlement was allocated a share of new housing based on its existing share of households in 2011, with the countryside receiving the remainder.

Alternative Option 2 – based on the RDS target. This option sought to directly meet the RDS target of 60% of all new housing located in brownfield sites of settlements greater than 5,000. In Newry, Mourne and Down this included the city of Newry, main town of Downpatrick, and smaller towns of Kilkeel, Warrenpoint, Ballynahinch and Newcastle.

**Table 2: POP Options for the Distribution of Housing Land**

Settlement Tier	POP Preferred Option	POP Option 1	POP Option 2
City/Main Town	32%	36%	23.1%
Town	30%	32.5%	26.1%
Village	12%	10.5%	14.5
Small Settlement	5%	6%	6.1%
Countryside	21%	15%	30.2%

- 3.16 The majority of the 208 public respondents had no comment to make on the distribution of housing land, 55 responses (26% of all public responses) did address this issue. Within this group 30 respondents (54%) agreed with the Council's preferred option, 17 respondents (30%) disagreed and 8 respondents (14%) held mixed views.
- 3.17 Amongst agents there was broad support for a balanced approach, with the focus of development being city and main towns however they did not support the Council's preferred approach. In some cases agents proposed a greater allocation to the larger towns within the town tier. Whilst some supported the preferred option, they regarded the 21% allocation to the countryside as excessive and unsustainable.
- 3.18 Whilst comments from statutory consultees were broadly split between non-committal (9) or mixed (4) there was a general concern that too much housing would be allocated to the countryside under the Council's preferred option. DfI highlighted the RDS objective of reinforcing the leading roles of Hubs and achieving a complementary urban/rural balance. They acknowledge that the Council's approach to this issue may be further refined by the future review of housing land and/or phased approach to the release of land.
- 3.19 NI Housing Executive indicated they would support a combination of Options 2 and the preferred option, with growth directed to the hubs and towns and the open countryside receiving a smaller proportion of growth than under the preferred option.

## **Key Issue 6 – Social Housing Need**

### **Options for Social Housing Need**

- Option 1 Set out a Strategic policy requiring all housing sites over a certain threshold, to provide a proportion of social housing.
  - Option 2 Zone sites solely for social housing
  - Option 3 Zone sites for social housing (not large scale) and in addition facilitate social housing as a proportion of larger housing schemes through key site requirements as currently operating under BNMAP.
  - Option 4 Combination of Options 1 and 3.
- 3.20 The Council's Preferred Option was Option 4:

*'This would help to ensure that social housing schemes were brought forward to meet identified need. In the absence of zoned sites, including those with social housing key site requirements coming forward, provision could still be met through operational policy on other housing sites.'*

- 3.21 Justification for this choice, as outlined in the POP was as follows: 'Option 4 is considered to be the preferred option as this affords the Council the maximum flexibility to address social housing need across the district.'
- 3.22 The preferred option was a combination of options 1 and 3. It was to set out a strategic policy requiring all housing sites over a certain threshold to provide a proportion of social housing. In addition sites would also be zoned for social housing either in full or in part through the use of key site requirements.
- 3.23 The POP set out three alternative options as follows:
- Alternative Option 1 – Set out a strategic policy requiring all housing sites, over a certain threshold to provide a proportion of social housing. NIHE suggested a 20% proportion for developments of 50 units or more or 1 ha or more. In areas of high social housing need could reduce to 25 units in urban areas and 10 units or more (0.5ha) in rural areas.
- Alternative Option 2 – Zone sites solely for social housing. The NIHE expressed concerns with this approach in that developing large scale developments (generally over 50 units) would prohibit the creation of balanced and sustainable communities.
- Alternative Option 3 – Zone sites for social housing (not large scale) and in addition facilitate social housing as a proportion of larger schemes through key site requirements as currently operating under BNMAP 2015.
- 3.24 The majority of the 208 public respondents had no comment to make on social housing, 27 responses (13% of all public responses) did address this issue. Within this group 10 respondents (37%) agreed with the Council's preferred option, 16 respondents (59%) disagreed and 1 respondent (4%) held mixed views.
- 3.25 Concerns were raised regarding the impact on viability. It was suggested that new policy needs flexibility to allow Key Site Requirements to be set aside if it was demonstrated that there was no need for social housing. The high levels of social housing were highlighted with need concentrated within Newry, Newcastle, Warrenpoint and Downpatrick. It was also suggested that Council should not succumb to pressure to remove social housing requirements.
- 3.26 The majority of statutory consultees (12 submissions, 86% of all statutory consultees) made no comment on the options provided while 2 agreed with the preferred option.
- 3.27 The Northern Ireland Housing Executive (NIHE) agreed with the preferred option, and stated that they would welcome the promotion of affordable

housing within mixed tenure developments. They also recommended a number of additional actions:

- Further to consideration of the high number of committed housing sites they suggested that the threshold for sites which provide a level of social/affordable housing should be lowered from the proposed figure of 50 units.
- The LDP should have a built in mechanism which would allow the affordable housing proportion to be increased if an acute need is demonstrated.
- Sites artificially divided to avoid provision of affordable housing should be refused.

3.28 While DfI welcomed the acknowledgement by Council of the importance of meeting affordable/social housing need they suggested that the LDP should consider exploring, alongside NIHE, whether a projection of social housing need can be provided over a longer period to align with the lifetime of the plan.

## **Key issue 7 – Housing in the Countryside**

### **Options for Housing in the Countryside**

- Option 1 Adopt existing policy approach
- Option 2 Adopt the existing policy approach but in addition provide clarification and minor changes to current policies to address a number of shortfalls.

3.29 The Council's Preferred Option was Option 2:

*'This option would seek, where feasible to tailor existing policy to the needs of the district. Initially this would involve clarification and minor changes to the carried forward policies. Following the outcome of the review into 'Development in the Countryside' the Council would further consider the scope within the revised SPPS to vary its housing in the countryside policies within the context of the Council's spatial growth strategy and strategic housing allocation.'*

3.30 Justification for this choice, as outlined in the POP was as follows: 'Option 2 would enable the Council to provide greater clarity to its rural planning policy and allow for minor changes to align with the district's rural housing needs. Overall there would be no significant change to the level of residential development in the countryside and this option would support the Council's Growth Strategy for the district.'



3.31 The POP set out one alternative option:

Alternative Option 1 – Adopt the current policy based approach as set out in PPS21 and the SPPS for single dwellings in the countryside. This option provided the same level of development opportunity in line with the SPPS however did not consider what scope there was to revise rural planning policies nor what opportunity there was to provide greater clarity or address shortfalls.

3.32 The majority of the 208 public respondents had no comment to make on housing in the countryside, 23 responses (11% of all public responses) did address this issue. Within this group 18 respondents (78%) agreed with the Council's preferred option, 4 respondents (17%) disagreed and 1 respondent (4%) held mixed views.

3.33 The majority of statutory consultees (10 submissions, 71% of all statutory consultees) made no comment on the options provided. Of those that did comment 3 agreed and 1 disagreed with the preferred option.

3.34 The NIHE suggested that the LDP should aim to limit the growth of dispersed, single dwellings in the countryside and rural housing should be primarily directed to villages and small settlements. They also advised that they would welcome an exceptions policy similar to that contained within CTY5 of PPS21.

3.35 DfI sought further clarification in respect of the preferred option to undertake minor changes and emphasised that any proposed variation or local adjustment to regional policy would need to be justified by providing appropriate evidence.

## **Key Issue 8 – Future Proofing and Housing for All**

### **Options for Future Proofing and Housing for All**

- Option 1 To retain the current design approach as set out in Planning Policy Statement 7(PPS7) Policy QD1 (general criteria for meeting housing design) with no adjustments or amendments.
- Option 2 Promote/encourage the provision of lifetime homes and require wheelchair accessible housing, across all tenures, to ensure an appropriate supply of homes for children, older people and those with physical disability.
- Option 3 Introduce new strategic policy covering lifetime homes and wheelchair accessible housing to require the provision of an appropriate

supply of homes for children, older people and those with physical disability.

3.36 The Council's Preferred Option was Option 3:

*'This option would require at least 20% of homes across all tenures, on sites of 50 or more dwellings to be built to lifetime homes standard. This option would also include the introduction of wheelchair accessible homes as per Option 2.'*

3.37 Justification for this choice, as outlined in the POP was as follows 'Option 3 would safeguard the provision of lifetime homes and wheelchair accessible homes within the district. This would ensure that the needs of the community are addressed by providing homes that are flexible and provide a better living environment for everyone.'

3.38 The preferred option was to introduce a new strategic policy covering lifetime homes and wheelchair accessible housing to require the provision of an appropriate supply of homes for children, older people and those with physical disability.

3.39 The POP set out two alternative options as follows:

Alternative Option 1 – Retain the current design approach as set out in Planning Policy Statement 7 (PPS7) Policy QD1 (general criteria for meeting housing design) with no adjustments or amendments.

Alternative Option 2 – Promote/encourage the provision of lifetime homes and require wheelchair accessible housing, across all tenures, to ensure an appropriate supply of homes for children, older people and those with physical disability.

3.40 The majority of the 208 public respondents had no comment to make on future proofing and housing for all, while 26 responses (13% of all public responses) did address this issue. Within this group 10 respondents (38%) agreed with the Council's preferred option, 15 respondents (58%) disagreed and 1 respondent (4%) held mixed views.

3.41 A number of respondents, that were supportive of the preferred options, recommended that percentage allocations for wheelchair accessible homes should be raised from 5% to 15% and lifetime homes increased from 20% to 33%.

- 3.42 The majority of statutory consultees (10 submissions, 71% of all statutory consultees) made no comment on the options provided. Those that did comment 3 agreed and 1 disagreed with the preferred option.
- 3.43 While the Housing Executive agreed with the principle detailed within the preferred option they would like to see this option strengthened to requiring all new housing to be developed to Lifetime Homes standards.
- 3.44 DfI welcomes the suggested policy approach which promotes the SPPS objective of quality housing and in doing so supports the creation of balanced communities.

## 4.0 District Profile

### Population and Households

- 4.1 The population at the time of the 2021 Census stood at 182,100 up from 171,500 in 2011. NISRA population projections indicate that this will increase to 193,746 by 2035. The population of the district is aging, in 2011 the number of people aged 65+ stood at 22,948 (13.38% of the population) this increased to 30,300 (16.7% of the population) by 2021, just below the NI average of 17.2% at that time. The district's population aged 65+ is projected to continue to increase to 42,988 (22.19% by 2035). The increase in the district's population aged 65+ is a factor in the declining average household size<sup>2</sup>.
- 4.2 In 2011 there were 27,535 children in the district aged 0-14, this represented 16.06% of the district's population. The 2021 Census highlighted that this group had increased in size to 37,800 accounting for 20.80%.
- 4.3 The number of households in the district has increased from 62,000 in 2011 to 68,400 in 2021 (10.3% increase against a NI average increase of 9.3%). This was higher than projected by NISRA in their 2016 based projections (see table 4.1 below)

**Table 3: NISRA Household projections 2016 Based<sup>3</sup>**

	2020	2021	2035
Newry, Mourne and Down	66,681	67,222	74,498
Northern Ireland	740,528	744,754	800,061

Source: NISRA

- 4.4 Average household size in 2021 was 2.64 against a NI average of 2.44. Based on NISRA's 2016 population projections the average household size is projected to fall to 2.6 by 2035.<sup>4</sup>

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<sup>2</sup> NISRA Mid 2018 Population Projections <https://www.nisra.gov.uk/publications/2018-based-population-projections-areas-within-northern-ireland>

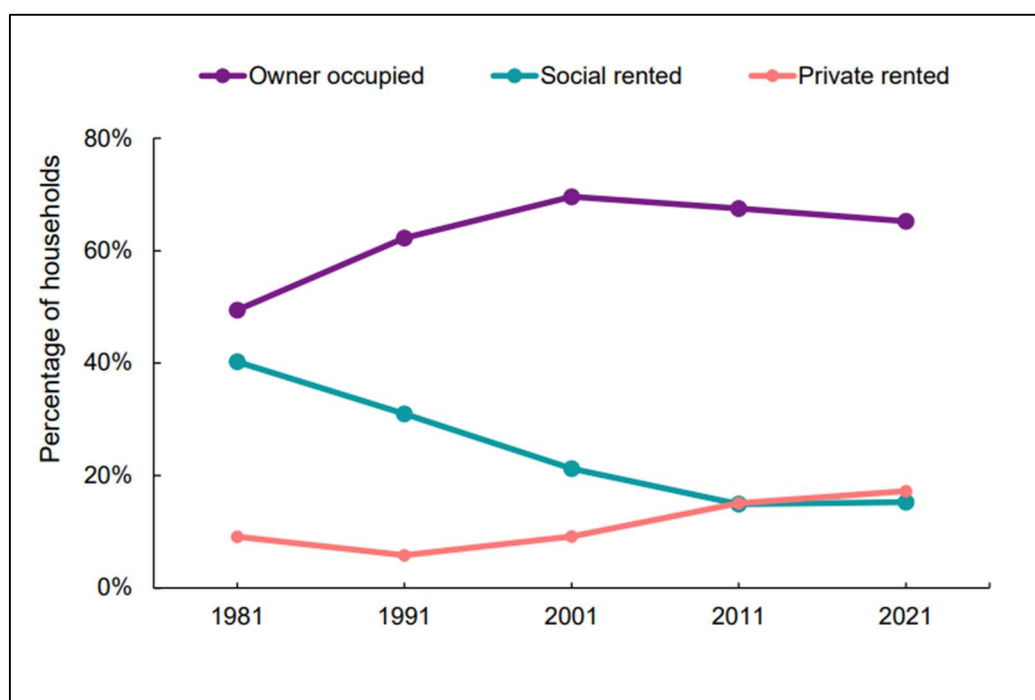
<sup>3</sup> NISRA NI Household Projections (2016 based) <https://www.nisra.gov.uk/publications/northern-ireland-household-projections-2016-based>

<sup>4</sup> NISRA 2021 Census Demography and Households <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-demography-and-households.pdf>

## Housing Tenure

- 4.5 At the time of the 2021 Census Newry, Mourne and Down had a slightly higher level of owner occupation 68.7% (46,569) than the NI average at 65.2%. NISRA notes that owner occupation reached a peak in NI at 69.6% in 2001 with a marginal fall to 65.2% in 2021.

**Figure 1: Percentage of Households by Selected Tenure (1981-2021 Census)**



Source: NISRA

<https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-2-statistical-bulletin-housing-people-in-households.pdf>

- 4.6 In terms of the social rented sector Newry, Mourne and Down had 7,356 (10.8%) social rented properties at the time of the 2021 census, compared with the NI total of 117,465 (15.3%).
- 4.7 The district also has a slightly higher proportion of privately rented properties 12,333 (18.03%) compared to the NI average 17.22%<sup>5</sup>. The private rented sector comprises 20.5% of total housing stock in the district (NISRA: 2021 Census).

<sup>5</sup> NISRA 2021 Census data - MS-E15: Tenure - households

- 4.8 The LDP Housing Strategy will take account of these statistics and trends within the district in seeking to deliver an appropriate mix of tenure as part of the overall provision of new housing over the Plan period.

### House Types

- 4.9 By 2035 it is projected that small households (single households and two adults no children) will make up 55.6% of all households (see table 4.2 below). The district's housing need is therefore likely to be focused on smaller size, new build housing across all tenures.

**Table 4: Household Projections by Household Type 2020 and 2035**

Household Type	NMDDC		Change	NI		Change
	2020	2035	%	2020	2035	%
Single person households	16,749	19,681	+17.5%	206,788	232,739	+12.5%
Two adults without children	17,169	21,709	+26.4%	204,300	243,166	+19.0%
Other households with no children	10,928	12,314	+12.7%	109,071	120,449	+10.4%
One adult household with children	4,054	3,872	-4.5%	46,914	43,437	-7.4%
Other households with children	17,781	16,922	-4.8%	173,125	160,270	-7.4%
<b>Total Households</b>	<b>66,681</b>	<b>74,498</b>	<b>+11.7%</b>	<b>740,198</b>	<b>800,061</b>	<b>+8.1%</b>

Source: NISRA 2016 Based Household Projections

- 4.10 The district's current housing stock in 2011 is set out in table 4.3 below. This shows that a significantly larger proportion of the district's housing stock consists of detached houses compared to the NI rate. The proportion of semi-detached houses is slightly less at 28.8% compared to a NI rate of 29.7%. The proportions of terraced dwellings and apartments/flats are lower than the NI level.

**Table 5: Breakdown of NMDDC Housing Stock (2021)**

		<b>Total Households</b>	<b>Detached</b>	<b>Semi-Detached</b>	<b>Terraced</b>	<b>Flat</b>	<b>Other</b>
<b>Northern Ireland</b>	<b>Units</b>	768,812	289,974	228,545	171,949	77,257	1,087
	<b>%</b>		37.7%	29.7%	22.4%	10.1%	0.14%
<b>NMDDC</b>	<b>Units</b>	68,396	33,814	19,663	10,489	4,236	194
	<b>%</b>		49.44%	28.8%	15.3%	6.2%	0.28%

Source: NISRA Census 2021

<https://www.nisra.gov.uk/publications/census-2021-main-statistics-housing-and-accommodation-tables>

Note – Other refers to caravan or other mobile or temporary structure

- 4.11 The 2021 Census states that 22.9% of people in the district have a long-term health problem or disability, which limits their day to day activities. The 2021 Census also indicates that 11.4% of all households at that time had their accommodation internally adapted for wheelchair use.<sup>6</sup>

### House Prices and Affordability

- 4.12 The Ulster University, in partnership with the NIHE and Progressive Building Society publish a quarterly report into NI house prices. The report details the key trends and spatial patterns in the housing market, drawing comparisons with the previous quarter.
- 4.13 The Q1 2024 report indicates that in Q4 2023 Causeway Coast and Glens had the highest average price with Newry Mourne and Down the second highest. Price changes across the NI LGDs were varied in Q1 of 2024 and resulted in Newry, Mourne and Down dropping to fourth place. Whilst the report highlights that there is fluctuation between LGDs it is clear that house prices in the district remain above the NI average and this represents a challenge in meeting the districts housing needs.

**Table 6: NI Quarterly House Price Index NMD and NI**

	Q1 2019	Q1 2020	Q1 2021	Q1 2022	Q1 2023	Q1 2024	% change 2019-24
NMD	£158,669	£166,252	£181,895	£211,887	£211,837	£236,068	+48.7%
NI	£162,914	£175,803	£189,853	£202,325	£203,326	£206,754	+27.5%

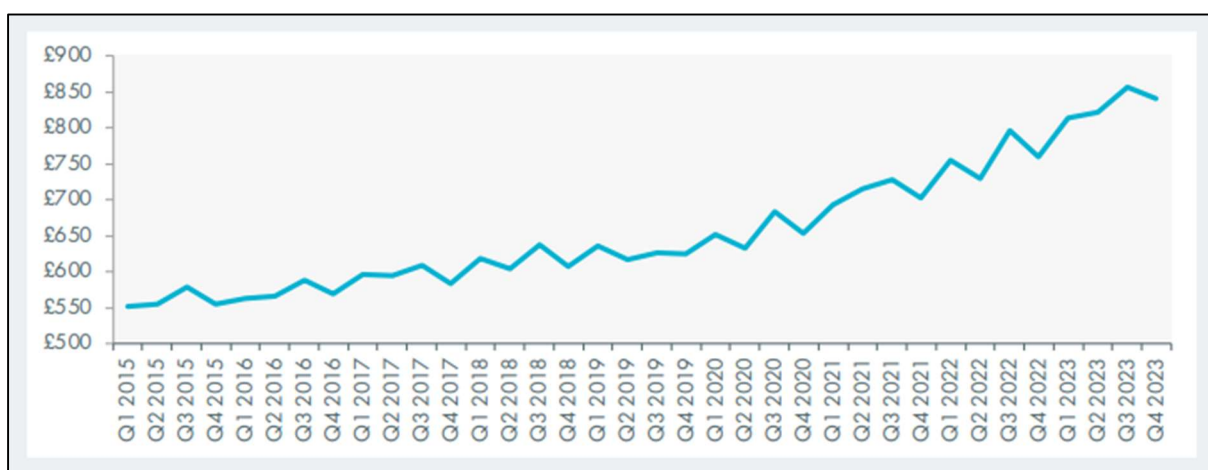
Source: Ulster University

<sup>6</sup> <https://www.nisra.gov.uk/publications/census-2021-main-statistics-health-disability-and-unpaid-care-tables>

<https://www.ulster.ac.uk/research/topic/built-environment/research-property-planning/housing-market-reports/house-price-index>

- 4.14 The Average monthly rent in the district in 2022 was £706, this increased to £777 (+10.1%) in 2023. This is under the average monthly rent for NI recorded at £833 in 2023.
- 4.15 The UU Private Rental Market report notes "*Market evidence indicates a vibrant market sector with strong, and in some instances, unprecedented annual rates of growth in average rents across some market locations, particularly those where evidence from rental agents indicates have considerable supply constraints.*"

**Figure 2: Average Rent by Quarter, Northern Ireland 2015-2023**



Source: Ulster University

[https://www.ulster.ac.uk/\\_data/assets/pdf\\_file/0004/1619140/3706\\_AHSS\\_A-t-a-glance-H2-2023\\_NIHE.pdf](https://www.ulster.ac.uk/_data/assets/pdf_file/0004/1619140/3706_AHSS_A-t-a-glance-H2-2023_NIHE.pdf)

**Table 7: Average Private Rental Market Rates for NMD**

	H1 2019	H1 2020	H1 2021	H1 2022	H1 2023	H2 2023	% change 2019-23
NMD	£553	£573	£597	£672	£765	£786	42.1%
NI	£627	£643	£703	£743	£817	£849	35.4%

<https://www.ulster.ac.uk/research/topic/built-environment/research-property-planning/housing-market-reports/rental-index>



Source: Ulster University Housing Market Reports – Northern Ireland Rental Index

- 4.16 Within the NIHE Housing Investment Programme (HIP) 2023-26 it is noted that over the longer term rents have increased by almost 50% from 2015 to 2022, while the number of properties available to rent has decreased by around 50% over the same period.

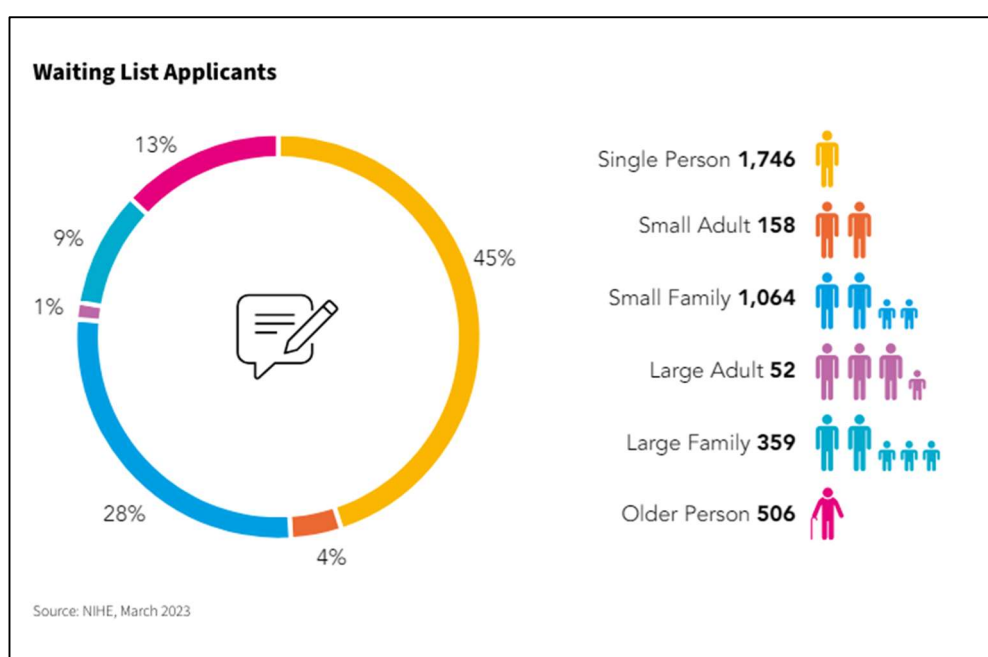
### Affordable Housing Need Social Rented Housing Sector

- 4.17 At March 2023 there were 2,981 Housing Executive and 1,517 Housing Association tenants in receipt of Housing Benefit. There were 51 new social homes completed in the year to March 2023 with 631 on-site. A further 237 are programmed to start over the period 2024-2027. At March 2023 there were 3,885 applicants on the district's waiting list, 3,133 of whom were in housing stress.

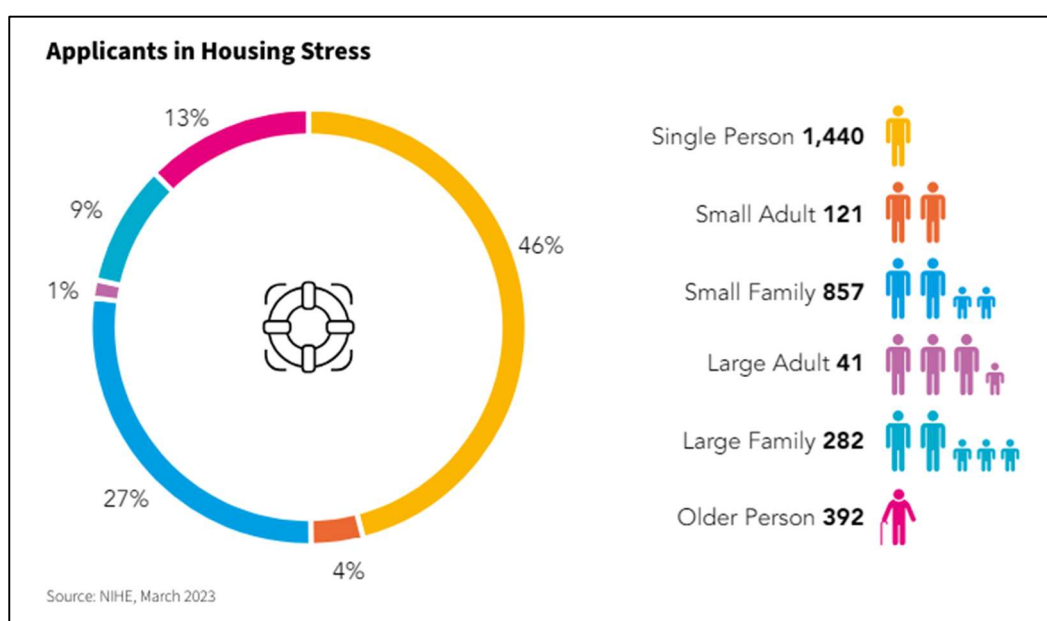
**Table 8: District Waiting List March 2023**

	Single	Small Adult	Small Family	Large Adult	Large Family	Older Persons	Total
Applicants	1,746	158	1,064	52	359	506	3,885
HS Applicants	1,440	121	857	41	282	392	3,133
Allocations	139	10	91	<10	30	74	

**Figure 3: District Waiting List Applications**



**Figure 4: District Applicants in Housing Stress**



Source: NIHE Housing Investment Plan 2023-26

- 4.18 The report indicates that within Newry, Mourne and Down the five year assessment for 2022-27 shows a need for 2,181 units while the 15 year 2020-2035 need for intermediate housing is 1,570 units.
- 4.19 The number of households presenting as homeless in the district increased between March 2022 and March 2023 with 1,082 presenters by the end of March 2023. In terms of specialised housing the report states that there was an identified need for 103 wheelchair units as of March 2022.

### General Housing Need (Urban & Rural)

- 4.20 Housing need for Newry, Mourne and Down has remained at a consistently high level between 2013 and 2023. The NIHE HIP (2023-26) indicates that within Newry, Mourne and Down the five year assessment for 2022-27 there is a need for 2,181 units while the 15 year 2020-2035 need for intermediate housing is 1,570 units.

- 4.21 At March 2023 there were 3,885 applicants on the waiting list for the district with 3,133 in housing stress.
- 4.22 The number of households presenting as homeless in the district increased between March 2022 and March 2023 with 1,082 presenters by the end of March 2023. In terms of specialised housing the report states that there was an identified need for 103 wheelchair units as of March 2022.
- 4.23 The NIHE Commissioning Prospectus<sup>7</sup> highlights the key areas of need across the district. Need is concentrated in the main urban settlements and some of the larger rural areas (see table 4.7 below). In line with NISRA's default urban/rural classification the Housing Executive considers rural areas to include all settlements with a population below 5,000 and the open countryside.
- 4.24 Newry City continues to demonstrate the highest housing requirement within the district. The housing need here is predominately for small family accommodation, two bedroom houses and generic bungalow accommodation for complex needs. The NIHE prospectus also notes that there is a requirement for generic wheelchair and bespoke (bungalow) units for complex needs in Newry City and throughout the district.
- 4.25 At March 2023 there were 995 applicants in rural Newry, Mourne and Down in housing stress (31.8% of the total waiting list).
- 4.26 Within the Prospectus the NIHE encourages the development of mixed tenure schemes in the City. The document highlights that eighteen sites throughout the City have received a social housing zoning as per the Banbridge, Newry and Mourne Area Plan 2015. The prospectus notes that while a number of zoned housing sites with a social housing requirement have come forward some of these sites have come forward, a number have not. The report states that the NIHE would encourage Housing Associations to investigate those remaining for potential development opportunities.

**Table 9: NIHE Projected (5-Year) Social Housing Need 2023-2028**

Settlement	Total 5 Year Projection
Newry City	508
Downpatrick	222
Annalong/Longstone/Glassdrumman	18
Ardglass	38
Ballynahinch	95
Bessbrook/Derramore	100

<sup>7</sup> NIHE Commissioning Prospectus – Social and Intermediate Housing Requirements for the period 2024/25-2026/27

Camlough	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
Newtowncloghogue	22
Rostrevor	44
Saintfield	58
Strangford	22
The Commons/Ballyholland	14
Warrenpoint	211
Remaining Settlements (need <10)	59
Total	2,234

*Source NIHE Commissioning Prospectus 2024-25 to 2026-27*

<https://www.nihe.gov.uk/getattachment/054082dd-6321-4ea7-861d-d6785cfa74cd/Commissioning-Prospectus-2024-25-to-2026-27.pdf>

### **Wheelchair Housing Need**

- 4.27 At March 2023 there were 96 housing stress applicants and 38 transfer applicants who required wheelchair accessible accommodation. The NIHE advise that in general generic wheelchair units should be for two or three bed units and built in line with the space standards included in the DfC Housing Association Guide.

### **Intermediate Demand**

- 4.28 The NIHE Commissioning Prospectus 2024-25 to 2026-27 estimates intermediate housing demand for Newry, Mourne and Down at approximately 100 units per annum.

### **Irish Traveller Accommodation**

- 4.29 No current need is identified within the Commissioning Prospectus although it is stated that this will continue to be monitored.

## 5.0 Consultee and Councillor Engagement

- 5.1 In order to meet the requirements set out in the Planning Act (Northern Ireland) 2011 relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the Department and other relevant government strategies and plans, the Council has engaged with key consultees representing relevant central government departments and agencies. This engagement was undertaken in three parts over the period June 2022 – June 2023. Stakeholders were provided with LDP Plan Strategy strategies and policies and afforded the opportunity to review and provide written comment.
- 5.2 Following on from the stakeholder engagement the draft Plan Strategy spatial growth strategy was presented to Members at the LDP Working Group on the 7 December 2023. The spatial growth strategy was subsequently reviewed in light of comments received.
- 5.3 The draft Plan strategy housing in settlements policies were presented to Members of the Council's Planning Committee on the 16 May 2024. The draft policies and associated were approved by Members with no amendments.
- 5.4 The draft Plan Strategy housing in the countryside policies were initially discussed with Members at a workshop on the 8 December 2021. A second workshop on these policies was held on the 20 September 2024 and draft policies were subsequently presented to the Council's Planning Committee on the 6 November 2024. Policies were updated following committee consideration on the 6 November 2024 and brought back to Members on the 18 December 2024. The committee approved the policies subject to agreed clarification being provided.
- 5.5 Following a review of the housing evidence base by consultants, the spatial strategy policies were finalised and brought back to Members at a Special Committee on the 31 March 2025, these were approved and the decision ratified by full Council on the 6th May 2025.

## 6.0 Evidence Base for Housing - Survey Work and Studies

### Newry, Mourne and Down Annual Housing Monitor

- 6.1 The SPPS states that a plan, monitor and manage approach to housing is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. It further states that monitoring should be an ongoing process with annual reporting and review. The Council undertake an annual housing monitor in relation to housing development in all settlements across the district. This has been ongoing since the transfer of planning powers to the Council in April 2015.
- 6.2 Sites to be monitored include those identified from the previous annual survey, which are not recorded as complete along with any new identified sites. These consist of sites zoned for residential development in prevailing development plans or sites granted planning permission for residential use. It is current practice to keep within the monitor sites which have previously received planning approval but where this has expired and work has not yet begun. The annual housing monitor data is compiled in a Housing Land Availability Study.
- 6.3 Whilst sites with expired planning permission and zoned sites with no planning permission (uncommitted sites) continue to be recorded as part of the annual monitor they are distinguished from those that have a live permission (committed sites). This has been done in order to ensure that a focus is maintained on those sites likely to be developed for residential use over the plan period.

**Table 10: Housing Monitor 2023 Total Committed & Uncommitted Sites**

	<b>Area Remaining (hectares)</b>	<b>Potential (Units)</b>
Committed Sites. Sites with live planning approval (zoned sites and white land).	220.78	3,727
Uncommitted Sites. Zoned sites with no live approval or white land (with expired approval).	380.4	6,749
<b>Total</b>	<b>601.18</b>	<b>10,476</b>

**Table 11: Housing Monitor 2023 – Committed/Uncommitted Sites by Settlement**

	<b>Committed Sites (Ha)</b>	<b>Committed Sites (Units)</b>	<b>Uncommitted Sites (Ha)</b>	<b>Uncommitted Sites (Units)</b>
City and Main Town				
Newry	40.32	1,140	39.56	1,158
Downpatrick	16.72	278	88.21	1,801
<b>Sub Total</b>	<b>57.04</b>	<b>1,418</b>	<b>127.77</b>	<b>2,959</b>
Local and Small Towns				
Newcastle	8.69	184	7.44	188
Warrenpoint/Burren	10.41	158	22.51	463
Kilkeel	10.29	162	22.25	422
Ballynahinch	16.51	312	35.11	694
Saintfield	2.18	11	3.62	82
Killyleagh	3.79	88	5.06	114
Castlewellan	1.18	16	0.87	22
Crossmaglen	5.71	118	4.3	115
<b>Sub Total</b>	<b>58.76</b>	<b>1,049</b>	<b>101.16</b>	<b>2,100</b>
Villages	<b>77.58</b>	<b>761</b>	<b>55.81</b>	<b>1324</b>
Small Settlements	<b>24.9</b>	<b>461</b>	<b>95.66</b>	<b>366</b>
<b>Total</b>	<b>218.28</b>	<b>3,689</b>	<b>380.40</b>	<b>6,749</b>

### Uncommitted Zoned Housing Sites

- 6.4 When considering the extent of uncommitted sites it is also important to distinguish between uncommitted zoned sites and other uncommitted sites within a settlement limit. In considering whether a site may be developed over the plan period there is a much greater likelihood that an uncommitted zoned housing site will come forward than an uncommitted unzoned site where planning permission has expired. The Council consider that there is a high likelihood that unzoned housing sites and certain zoned mixed use sites will be developed over the plan period and consequently these have been included as part of the district's housing supply. Tables 6.3 sets out the extent of uncommitted zoned sites across the district based on the 2023 Housing Monitor.

**Table 12: Housing Monitor 2023 – Uncommitted Zoned Housing Sites by Settlement**

<b>Settlement/ Zoning</b>	<b>Address</b>	<b>Area (Ha)</b>	<b>Units</b>
<b>Newry</b>			
NY15	1&2 Corry Sq.	0.13	16
NY17	Dorans Hill/Upper Kiln Street	1.18	21
NY27	East of Kilvarragh	1.39	34
NY32	Watsons Road/Chan	1.95	42
NY35	South east of Carnagat Park	0.23	10
NY36	Lands surrounding 81-85 Drumalane Rd	1.18	18
NY38	Land at Dublin Rd	0.59	14
NY43	Drumalane Road/Fathome Line	0.8	40
NY44	Warren Hill	2.57	40
NY45	West of Camlough Rd	2.12	53
NY46	West of 41 Camlough Rd	1.3	33
NY48	Adjacent to 37-40 Ardmore Rd	0.96	27
NY49	East of Upper Damolly Rd	2.5	60
NY51	West of Chequer Hill	3.66	90
NY52	Dorans Hill	1.93	58
NY54	Dublin Road/Drumalane Rd	0.23	40
NY56	Watsons Road West	2.19	34
NY57	East of Liska Villas	1.5	37
NY58	Chancellrs Road/Dublin Rd	1.78	57
NY59	Drumalane Road East	1.38	27
<b>Total</b>		<b>29.57</b>	<b>751</b>
<b>Downpatrick</b>			
DK07	Between Saul Road and Ballyhornan Rd	50.5	943
DK08	North of Ardenlee Gardens and Saul Rd	5.96	120
DK09	Racecourse Hill	1.55	38
DK10	South of Killough Rd	2.52	50
DK11	Flying Horse Rd	3.2	64
DK12	Between Ballyhornan Rd and Struell Wells Rd	9.03	261
DK13	South of Struell Wells Rd	4.27	86
<b>Total</b>		<b>77.03</b>	<b>1,562</b>
<b>Newcastle</b>			
NE07	Dundrum Road	4.12	92
NE08	North of Meadowvale, Tollymore Rd	0.5	4
<b>Total</b>		<b>4.62</b>	<b>96</b>
<b>Warrenpoint/ Burren</b>			
WB08	Wells Rd	0.32	4
WB10	Upper Dromore Rd/Fairview	0.06	2
WB11	Seafields, Rostrevor Rd	1.1	28
WB12	Burren Rd	1.42	21
WB16	Burren Rd/Forth Rd	2.41	45



WB17	Bridle Loanan North	1.59	39
WB19	Upper Dromore Rd	1.27	18
WB20	Clonallon Rd/Rath Rd	5.44	109
WB21	Rath Rd	0.74	15
WB22	Upper Dromore Rd/West of Spring Meadows	2.71	81
WB23	Carrogs Rd	1.75	35
<b>Total</b>		<b>18.81</b>	<b>397</b>
<b>Kilkeel</b>			
KL04	Adj to Brooklands Nursing Home, Newry Rd	0.57	27
KL05	Rear of 2-18 Mountain Rd	0.14	18
KL08	Newcastle Rd	7.93	136
KL13(1)	Sheemore Crescent, Newcastle Rd	0.77	12
KL14	Council Rd	3.06	52
KL16	Mill Rd/Kilmorey Crescent	0.75	14
KL17	Newry Road	1.24	25
KL18	Greencastle Road, North	3.16	63
<b>Total</b>		<b>17.62</b>	<b>347</b>
<b>Ballynahinch</b>			
BH10	Western Side of Belfast Rd	2.11	42
BH12	South of Crossgar Rd and West of Ballynahinch	9.09	137
BH13	Between the Belfast Rd and the Ballynahinch	5.3	106
BH14	South of Moss Rd and east of the Ballynahinch	14.48	290
BH16	Land at Grove Rd	1	20
<b>Total</b>		<b>31.98</b>	<b>595</b>
<b>Saintfield</b>			
HPA1	Between Lisburn Rd and Middle Rd	0.4	8
HPA3	Lands to the west of Old Grand Jury Rd	0.58	12
HPA4	Lands to the east of Carrigmore	0.72	12
<b>Total</b>		<b>1.7</b>	<b>32</b>
<b>Killyleagh</b>			
HPA3	Lands of Inishmore, adjoining the Anchorage	3.32	66
<b>Total</b>		<b>3.32</b>	<b>66</b>
<b>Castlewellan</b>			
HPA3	South East o Mountain View and Woodvale	0.5	10
<b>Total</b>		<b>0.5</b>	<b>10</b>
<b>Crossmaglen</b>			
CM05	Cullaville Rd	1.25	28
CM07	Lisbeg Park	0.78	23
CM09	Blaney Rd	1.8	46
<b>Total</b>		<b>3.83</b>	<b>97</b>
<b>Rostrevor</b>			
RR04	Warrenpoint Rd	2.67	67
<b>Total</b>		<b>2.67</b>	<b>67</b>
AN02	East of Mullartown Park	0.63	10
AN07	Kilkeel Rd South	0.39	20

AN09	Moneydarragh Rd	1.47	19
<b>Total</b>		<b>2.49</b>	<b>49</b>
<b>Crossgar</b>			
HPA3	Lands east of Kilmore Rd	5.27	105
<b>Total</b>		<b>5.27</b>	<b>105</b>
<b>Hilltown</b>			
HN07	Rear of Fegan's Gardens/Kennedy Drive	0.26	5
HN11	Rathfriland Rd	0.38	3
HN12	West of Glenveagh	1.25	4
<b>Total</b>		<b>1.89</b>	<b>12</b>
<b>Drumaness</b>			
HPA1	Lands south east of Hillside	5.07	71
<b>Total</b>		<b>5.07</b>	<b>71</b>
<b>Camlough</b>			
CL06	West of Quarter Rd	0.74	25
CL07	North of Newtown Rd	0.48	16
<b>Total</b>		<b>1.22</b>	<b>41</b>
<b>Mayobridge</b>			
MY04	Lisbane Park	0.71	19
<b>Total</b>		<b>0.71</b>	<b>19</b>
<b>Newtownhamilton</b>			
NN04	East of Dumgormley	0.76	27
NN05	Newry Road North	0.66	13
<b>Total</b>		<b>1.42</b>	<b>40</b>
<b>Ballyholland</b>			
BH02	Ballyholland Road North	0.71	16
BH04	Billy's Road	0.61	15
<b>Total</b>		<b>1.32</b>	<b>31</b>
<b>Mullaghbane</b>			
MB04	Tullymacreeve Rd/Glebe Park	0.56	11
<b>Total</b>		<b>0.56</b>	<b>11</b>
<b>Forkhill</b>			
FL02	School Road North	1.63	45
<b>Total</b>		<b>1.63</b>	<b>45</b>
<b>Jonesborough</b>			
JH04	Edennappa Rd/Kilnasaggart Rd	0.91	18
<b>Total</b>		<b>0.91</b>	<b>18</b>
<b>Cullyhanna</b>			
CA03	Sheetrim Road	0.87	21
<b>Total</b>		<b>0.87</b>	<b>21</b>
<b>Shrigley</b>			
HPA1	Lands south of Crossgar Road	0.53	11
<b>Total</b>		<b>0.53</b>	<b>11</b>
<b>Attical</b>			
AL04	South of Tullyframe Road	0.65	15
<b>Total</b>		<b>0.65</b>	<b>15</b>
<b>Glassdrumman /Mullartown</b>			
GM02	Glassdrumman Rd	1.24	19
<b>Total</b>		<b>1.24</b>	<b>19</b>

## Housing in the Open Countryside

- 6.5 The annual Housing Monitor is limited to settlements within the district and there is no similar housing monitor undertaken to assess the quantum of houses being built in the open countryside. In order to gain an understanding of the level of housing development in the open countryside planning approvals together building control completion data has been analysed. It should be noted that the criteria for defining a completed dwelling varies between the Housing Monitor and that required for a Building Control completion certificate.

**Table 13: Rural Approvals by Relevant Policy (PPS21) 2015-2023**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
CTY2a	1	4	6	2	0	0	1	1
CTY4	3	1	1	0	0	1	0	3
CTY6	1	1	3	1	0	0	0	1
CTY8	20	66	61	34	49	15	61	71
CTY10	62	105	95	57	56	20	67	66
<b>Totals</b>	<b>87</b>	<b>177</b>	<b>166</b>	<b>94</b>	<b>105</b>	<b>36</b>	<b>129</b>	<b>142</b>

Source: NI Planning Portal

**Table 14: Rural Completions by Commencement Date**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Total
1991-92	0	2	0	0	0	1	1	0	4
1992-93	0	0	0	0	0	0	0	0	0
1993-94	0	1	0	0	0	0	0	0	1
1994-95	1	0	0	0	0	0	0	1	2
1995-96	0	1	2	1	0	0	0	0	4
1996-97	0	1	0	0	0	0	0	0	1
1997-98	1	0	0	0	0	0	0	0	1
1998-99	0	1	0	0	0	0	0	0	1
1999-00	0	0	0	0	0	0	1	0	1
2000-01	0	1	0	1	0	0	1	0	3
2001-02	0	0	0	2	1	1	0	0	4
2002-03	0	2	0	3	1	2	0	0	8
2003-04	1	0	1	1	1	1	0	0	5
2004-05	1	1	1	2	1	2	0	0	8
2005-06	3	5	1	4	2	0	0	1	16
2006-07	10	5	2	4	2	2	1	1	27
2007-08	8	11	3	4	6	2	4	2	40
2008-09	15	9	5	10	9	7	2	6	63
2009-10	11	12	11	5	5	10	8	2	64
2010-11	9	10	7	8	3	4	2	8	51
2011-12	12	4	9	6	9	2	4	2	48
2012-13	15	14	5	2	7	4	2	6	55
2013-14	31	15	9	6	5	3	9	3	81
2014-15	45	32	9	10	6	2	4	2	110
2015-16	7	33	25	15	13	2	13	5	113
2016-17		4	51	42	16	8	6	10	137
2017-18			2	54	50	23	15	10	154
2018-19				4	61	34	16	16	131
2019-20					2	42	41	24	109
2020-21						5	45	43	93
2021-22							8	48	56
2022-23								2	2
Total	170	164	143	184	200	157	183	192	1,393

Source: NMDDC Building Control

**Table 15: Rural Completions excluding Replacements and Commencements Pre 2010**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Total	Average
All completions	170	164	143	184	200	157	183	192	1,393	175
Replacement completions	26	16	22	33	43	36	58	48	282	35
Completions excluding replacements	144	148	121	151	157	121	125	144	1,111	140
All completions commenced 2010 onwards.	119	112	117	147	172	129	165	179	1,140	143
Replacements commenced 2010 onwards.	23	15	22	31	43	33	58	48	273	34
Completions commenced 2010 onwards excluding replacements	96	97	95	116	129	96	107	131	867	108

Source: NMDDC Building Control and NI Planning Portal

- 6.6 An analysis of the completions in the countryside for the years 2015/16 to 2022/23 indicates that 253 (approximately 18%) of the 1,398 completions are likely to have originated from applications approved under the current policy context (PPS21). Whilst it is acknowledged that 1,398 dwellings have been completed since April 2015, it is the view that those which pre-date the current policy context skew the figures and should therefore be discounted from historical build rates. Those dwellings that were approved under the policy context that pre-dates PPS21 are a legacy of a time when policies were more relaxed under the Planning Strategy for Rural Northern Ireland (PSRNI). As is shown from table 6.5 above the impact of these dwellings on average build rates will continue to drop off with the passage of time.

### **Urban Capacity Study 2020**

- 6.7 An interim urban capacity exercise was undertaken to identify the potential for future housing capacity within the urban footprint of the district's towns over 5,000 population. This study will be updated at the LPP stage and will help to ensure that the LDP in identifying land for housing will give priority to sites within existing urban footprints, including the reuse of previously developed land. The interim urban capacity study is considered further in Section 7.

### **NIHE NMDDC Housing Investment Plan (HIP) 2023-2026**

- 6.8 The NI Housing Executive is statutorily required under the 1981 Housing Order to report to Councils on its past year's performance and proposals for the following year. The mechanism by which the NIHE does this is through their Housing Invest Plans. The Housing Investment Plan 2023-2026 goes further covering a 3 year period. The Plan is aligned with the outcomes of the district's Community Plan to show how work supports the delivery of the plan's objectives and provides an overview of the district's affordable housing need over the plan period.
- 6.9 The report indicates that as of March 2023 the social housing new build requirement over the period 2022-2027 within the Newry, Mourne and Down district is 2,181 and the intermediate housing need is 1,570 units between 2020 and 2035<sup>8</sup>.

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<sup>8</sup> Further detail on the housing needs of the district is set out in Section 3 Housing Profile.

## NIHE NMDDC Housing Investment Plan Update 2024

- 6.10 This represents the first of two annual updates of the Housing Investment Plan 2023-2026.
- 6.11 The HIP update sets out revised figures as of March 2024 which show that that the social housing new build requirement over the period 2023-2028 within the Newry, Mourne and Down district is 2,234 and the intermediate housing need is 1,570 units between 2020 and 2035.

## NIHE Housing Market Analysis (HMA)

- 6.12 Produced by the Northern Ireland Housing Executive, the purpose of the Housing Market Analysis is to provide an evidence base upon which to develop housing policies and approaches to ensure household access to appropriate housing. The HMA provides a regional and local housing market context, highlights current housing market trends and future imbalances in the housing market.
- 6.13 Housing Market Areas are defined as:
- "The spatial area within which most households both live and work and where those moving house without changing their place of work search for, and choose, a home."*
- 6.14 The Newry, Mourne and Down District is covered by two HMAs:
- The Newry HMA; and
  - The Belfast Metropolitan HMA

## Map 1: NI Housing Market Areas



## Map 2: Belfast Metropolitan HMA



Source: NIHE Strategic Housing Market Analysis

- 6.15 The SPPS states that Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation, through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, supported housing and travellers' accommodation.

### **NIHE Strategic Housing Market Analysis Reports 2022**

- 6.16 Updated research was commissioned by the NIHE in 2020 and resulted in the publication of Strategic Housing Market Analysis (SHMA) Reports in October 2022. The SHMA reports provide housing requirement projections for the 15 years 2020 to 2035, both in total and by tenure, i.e. private, intermediate and social housing need.

### **Methodology**

- 6.17 The SHMA assessment is based on the net stock model (NSM) which projects future housing requirements from three main components as follows:
- Newly arising need and demand due to projected net growth in the number of households.
  - Existing unmet need, most often referred to as the backlog of unmet need, i.e. the shortfall between current provision and the accommodation needs of existing households as well as individuals or families that have not yet formed as separate households.
  - Accompanying demand (second homes) and supply-side adjustments (vacant dwellings, conversions, etc.).
- 6.18 The backlog of unmet need for social housing can be considered to encompass three main components:
- Households and potential households without self-contained accommodation.
  - Owner-occupiers and private renters in need of social rented housing.
  - Social rented sector tenants in unsuitable accommodation.
- 6.19 The net new dwelling requirements by tenure have been projected based on a household affordability model, with income tests deployed to assign the following categories:
- Market – can afford market rent or has sufficient income to enter and sustain home ownership.



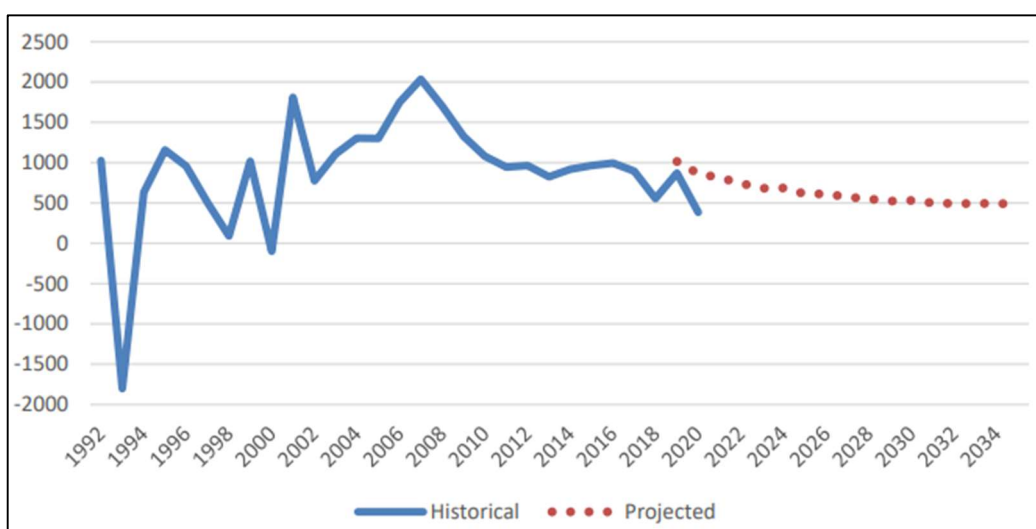
- Intermediate – cannot afford market rent but can afford more than social rent.
- Social – cannot afford intermediate or market rent

## South Eastern Area Report – Craigavon and Newry HMAS

### Population Change

- 6.20 Based on the 2020 mid-year population estimates the Newry HMA contains 63 per cent of the Newry, Mourne and Down LGD.
- 6.21 Population growth was strong between 2001 and 2011 up by 14% (almost double the NI average of 7.4%). Between 2011 and 2020 population growth slowed to 6.9% in the Newry HMA however remained above the NI average of 4.5%. Between 2001 and 2011 population growth was faster in rural areas than in urban areas and this continued between 2011 and 2020, albeit the differential in growth rates was reduced compared to the previous decade.
- 6.22 According to NISRA 2018 based population projections between 2018 and 2035, the population of the Newry HMA is expected to increase by 9.5%.
- 6.23 The HMA states that when natural change and migration trends are extrapolated forward, the result is a decreasing rate of population growth up to 2035.

**Figure 5: Annual Population Change, Newry HMA, Historical and Projected**



Source: NIHE SHMA – South Eastern Area Report

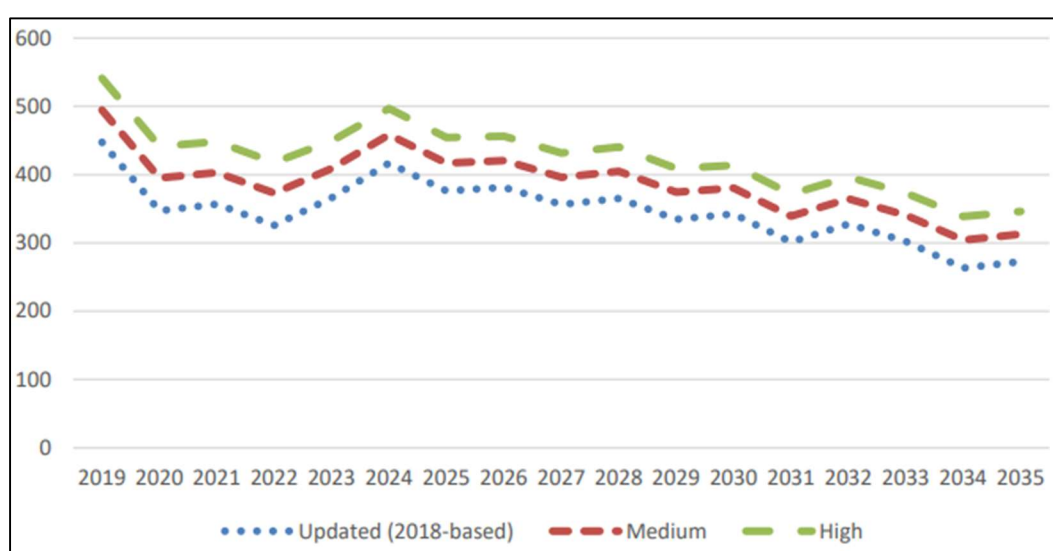
- 6.24 The 2018-based population projections anticipate a continuation of the ageing trend however it is anticipated to proceed more slowly in the South Eastern

Area HMAs. In the Newry HMA the child population (aged under 16) is projected to remain above the population aged 65+ until 2035.

## Households

- 6.25 The SMA report notes that historical data for the number of households at the geographical level required for the SHMA was only available for the decennial Census of Population, with the most recent data for 2011.
- 6.26 The most recent official population projections indicate that population growth will provide less of an impetus to household growth over the next 15 years. The growth in the number of households is projected to be fastest in the period through the mid-2020s. The HMA consequently notes that, household growth is likely to be slower than had been the case up to 2011.
- 6.27 For the Newry HMA, between 2018 and 2035 the medium growth scenario projects growth of 16.3 per cent in the number of households (+6,590 newly arising households). The updated scenario yields a slower rate of growth (+14.7 per cent or 5,880 newly arising households) while the fast growth scenario projects a rise of 17.8 per cent (+7,230 newly arising households).

**Figure 6: Household Projection Scenarios, Annual Changes, Newry HMA**



Source: NIHE SHMA – South Eastern Report

- 6.28 The Report notes that as the future path of household growth plays a major role in the level of demand for housing, the household growth scenarios are key inputs to protecting future housing requirements.

## **Housing Requirements**

- 6.29 Based on the net stock model, new dwelling requirements have been projected over the 15-year period 2020 to 2035. The household projections on which the dwelling requirements are based are taken from the medium household growth scenario.
- 6.30 For the Newry HMA, the projected number of newly arising households over the 15 year period is 5,700. After allowing for expected changes in second homes, vacant dwellings, and the replacement of dwellings lost due to dereliction, demolition, etc, the projected total new dwelling requirements amount to 6,250, giving an average annual requirement of 420 dwellings over the 15-year period.
- 6.31 With the addition of the backlog, the total new dwelling requirement for the period 2020 to 2035 increases to 7,030. Over the 15-year projection period, the net backlog adds an annual 50 to the requirement, bringing the annualised total to 470.

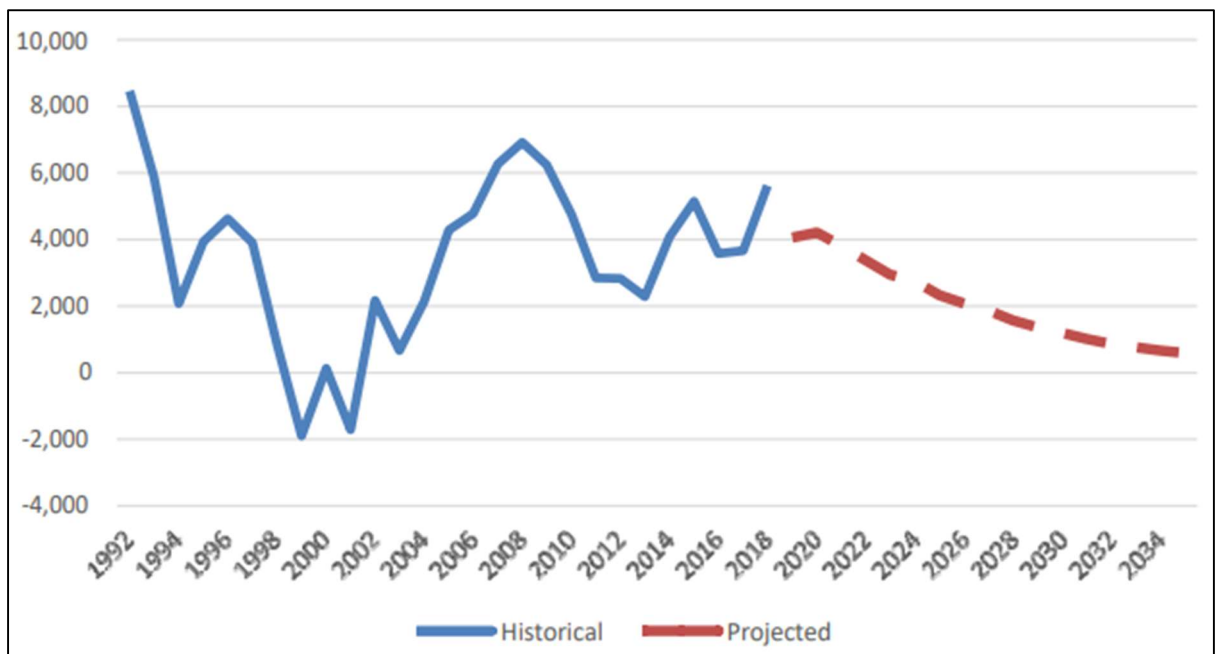
## **Belfast Metropolitan Area Report - Strategic Market Analysis**

- 6.32 The Belfast Metropolitan HMA comprises the LGDs of Antrim and Newtownabbey, Ards and North Down, Belfast and Lisburn and Castlereagh. In addition, the HMA includes substantial parts of Mid and East Antrim (50 per cent in population terms) and Newry, Mourne and Down (36 per cent).

## **Population Change**

- 6.33 The Report notes that the pace of population growth slackened in the period 2011-2018 compared with the previous decade from 2001-2011.
- 6.34 The ageing of the population. The proportion of the HMA's population aged 65 and over rose from 14 per cent in 1991 to 17 per cent by 2018. The 2018-based population projections anticipate a continuation, and even acceleration, of the ageing trend.
- 6.35 The report highlights when natural change and migration trends are extrapolated forward, the result is a slower pace of population growth over the next 15 years. It is stated that projections anticipate a reduction in the annual growth of the population from about 4,000 to under 1,000 by the 2030s (Figure 6.3).

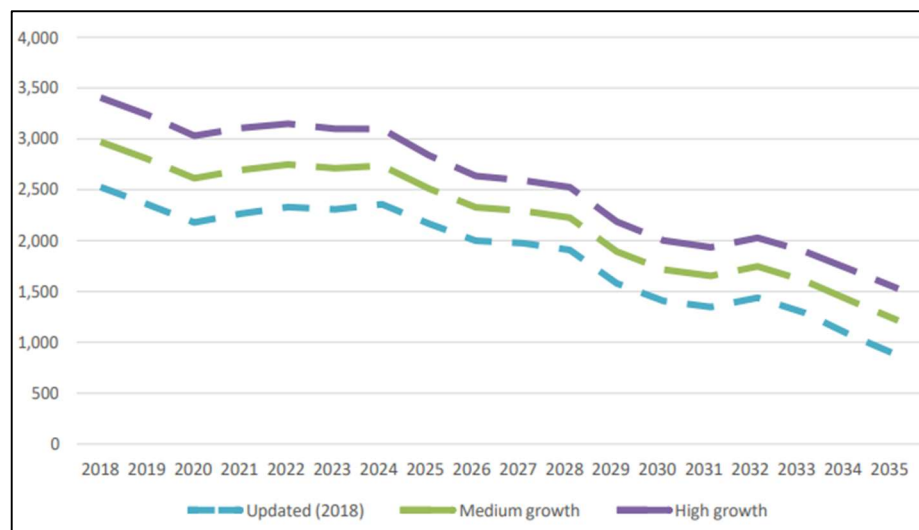
**Figure 7: Annual Population Change, Historical and Projected, Belfast Metropolitan HMA**



Source: NIHE SHMA – Belfast Metropolitan HMA

- 6.36 From the mid-2020s onwards, in each of the projection scenarios, household growth is projected to slacken in tandem with a slower pace of population growth (Figure 6.4).

**Figure 8: Household projection scenarios, annual changes, Belfast Metropolitan HMA**



Source: NIHE SHMA – Belfast Metropolitan HMA Report

**Table 16: Population change by Local Government Districts contained within Belfast Metropolitan HMA, 1991 to 2018**

	1991-2001	2001-2011	2011-2018
	%	%	%
Antrim and Newtownabbey	5.8	7.7	2.8
Ards and North Down	8.2	4.9	2.5
Belfast	-4.0	1.6	2.4
Lisburn and Castlereagh	10.0	8.6	6.7
Mid and East Antrim (Part)	9.9	4.1	1.1
Newry, Mourne and Down (Part)	8.2	8.7	2.5
<b>Belfast Metropolitan HMA</b>	<b>3.2</b>	<b>4.8</b>	<b>3.0</b>
<i>N. Ireland</i>	<i>5.1</i>	<i>7.4</i>	<i>3.7</i>

Source: NIHE SHMA – Belfast Metropolitan HMA Report

## Housing Requirements

- 6.37 Based on the net stock model, new dwelling requirements have been projected over the 15-year period 2020 to 2035. The projections are made for the Belfast Metropolitan HMA as a whole and its constituent LGDs and subareas.
- 6.38 The household projections on which the dwelling requirements are based are taken from the medium household growth scenario. The total new dwelling requirements from the projected changes amounts to 36,370, giving an average annual requirement of 2,420 dwellings over the 15-year period.
- 6.39 Household growth is projected to slacken from the mid-2020s onwards, reflecting the expected slower growth in population. That feature of the household projections is strongly reflected in the projected trajectory of new dwelling requirements. Thus, new dwelling requirements over the decade 2020 to 2030 are projected to average 2,730 per annum, falling to 1,820 per annum in the five years between 2030 and 2035.
- 6.40 The HMA contains an estimated 6,320 homeless individuals and families who do not have their own self-contained accommodation. They form the net backlog of housing need, i.e. additional new dwellings are required to meet their need for accommodation.

- 6.41 With the addition of the backlog, the total new dwelling requirement for the period 2020 to 2035 increases to 42,690. Over the 15-year projection period, the net backlog adds an annual 420 to the requirement, bringing the annualised total to 2,850.

**Table 17: New dwelling requirements and components, 2020-2035, net stock model with backlog, LGDs contained within Belfast Metropolitan HMA, medium household growth scenario**

	Households	Net backlog	Other changes	Total
	<i>No.</i>	<i>No.</i>	<i>No.</i>	<i>No.</i>
Antrim and Newtownabbey	5,000	720	90	5,810
Ards and North Down	4,860	550	610	6,020
Belfast	7,350	3,770	2,020	13,140
Lisburn and Castlereagh	10,200	670	1,150	12,010
Mid and East Antrim (part)	1,280	250	570	2,100
Newry, Mourne and Down (part)	2,790	360	450	3,600
<b>Belfast Metropolitan HMA</b>	<b>31,480</b>	<b>6,320</b>	<b>4,890</b>	<b>42,690</b>

Source: NIHE SHMA – Belfast Metropolitan HMA Report

Note: The SHMA NI Summary Report provides an overall new dwelling requirement within NMDDC. This is set out in Section 7.

## **7.0 Draft Plan Strategy Policy Approach**

- 7.1 Taking account of the population and household profile of the district, projected future growth and housing needs, the LDP Plan Strategy brings forward a range of strategic proposals and policies to meet the anticipated need over the lifetime of the Plan.
- 7.2 The NMDDC policy approach to housing in the district's settlements is guided by and aligns with the regional policy as set out in paragraph 6.136 of the RDS:
- a) Facilitate an adequate and available supply of quality housing to meet the needs of everyone;
  - b) Promote more sustainable housing development within existing urban areas; and
  - c) Provide an appropriate mix of housing development with houses in a range of size and tenures.
- 7.3 The NMDDC policy approach to housing in the countryside also aligns with overarching aim of the SPPS:
- 7.4 To manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting rural communities consistent with the RDS.
- 7.5 This section subsequently sets out the evidence base for the Plan Strategy strategic proposals and policies aligned to the regional policy requirements as highlighted above.

### **Strategic Housing Allocation**

- 7.6 The draft Plan Strategy Strategic Housing Allocation is set out in Strategic Proposal HS1 within the Spatial Growth Strategy and has been informed by the following SPPS criteria:

#### **1. RDS Housing Growth Indicators (HGIs)**

- 7.7 The RDS expresses regional housing needs as Housing Growth Indicators (HGIs), which are produced as a guide for the preparation of Local Development Plans. The HGI is an estimate of the new dwelling requirement for the Council area over most of the Plan period. The figures are based on current population/household formation trends making the assumption that these trends will continue in the future.

- 7.8 They are therefore guidance, rather than a cap on housing development in the area or a target to be achieved. In addition to the household projections, the HGIs also use data on vacant housing stock, second homes and net conversions/closures/ demolitions (net stock loss) to produce the final figure.
- 7.9 In September 2019 the Department for Infrastructure published revised Housing Growth Indicators figure of 10,000 for Newry, Mourne and Down for the period 2016-2030.
- 7.10 In considering the level of housing need over the Plan period the Council looked at a number of different approaches. This included simply applying the same level of need (10,000 units) over a different 15 year time period (2020-2035) and extending the HGIs to 2035.
- 7.11 Extending the HGI period to 2035 includes four years (2016-2019) that are not relevant to the Plan period, this approach was not considered appropriate and ruled out. Whilst the HGI and LDP both cover a 15-year period the HGIs do not take account of the decreasing trend in the increase in the level of annual household change in the second half of the LDP period. NISRA 2016 based population projections indicate a downward trend in the level of household growth from an additional 586 households in 2027-28 to an additional 395 households in 2034-35.
- 7.12 Given the importance of the HGIs in informing the level of housing need the Council commissioned a Review of its housing evidence base and an examination of the robustness of the RDS HGIs. This review has taken account of the downward trend and identified a need for 9,965 dwellings between 2020-2035. This was subsequently rounded to 10,000 and so aligned with the HGI figure for the 2016-2030 period.
- 7.13 There is a requirement for the council to ensure that the identified HGI figure can be met. The review of the LDP evidence base recommended a 10% flexibility allowance be applied to the housing requirement. A buffer of 10% over-supply has consequently been applied to the HGI baseline figure which takes into consideration the possibility that an element of the identified potential might not come forward during the plan period. This gives a resultant figure of 11,000 units and provides the overall strategic housing allocation (SHA).

## **2. Use of the RDS Housing Evaluation Framework**

- 7.14 The next stage in the housing allocation process involved applying the RDS Housing Evaluation Framework (HEF). The RDS states that the broad



evaluation framework (set out in Table 3.2 RDS) is to be used to assist judgements on the allocation of housing growth.

- 7.15 The six tests within the HEF are based on the capacity of a settlement to accommodate additional housing growth, with the overall aim of ensuring that the concept of sustainable development is built into the housing allocation process.

**Table 18: RDS Housing Evaluation Framework**

<b>TABLE 3.2: Housing Evaluation Framework</b>	
<b>Resource Test</b>	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
<b>Environmental Capacity Test</b>	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
<b>Transport Test</b>	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.
<b>Economic Development Test</b>	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
<b>Urban and Rural Character Test</b>	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
<b>Community Services Test</b>	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

- 7.16 The district's settlements have been assessed against the RDS Housing Evaluation Framework and details of this assessment are contained in the settlement appraisals which are contained within Technical Supplement 7 – Countryside Assessment.
- 7.17 The assessment reaffirmed the position of the majority of settlements within the hierarchy. Newry City sits at the top of the hierarchy along with the main town of Downpatrick. There are eight towns, 23 villages and 51 small settlements (see Table 7.2).

**Table 19: The Settlement Hierarchy**

Settlement Hierarchy		Newry, Mourne & Down Settlement Populations		
Tier 1 –City & Main Town	Main hubs will be the focus of development for housing, employment, retail, leisure and community facilities.			
		Newry (26,893)		
		Downpatrick (10,874)		
Tier 2 - Local & Small Towns	Smaller towns providing a range of retail, services, leisure and community facilities.	Warrenpoint/Burren (8,721)	Saintfield (3,406)	
		Newcastle 7,743	Killyleagh (2,928)	
		Kilkeel (6,521)	Castlewellan (2,792)	
		Ballynahinch (5,715)	Crossmaglen (1,608)	
Tier 3 - Villages	Local service centres providing goods, services and facilities to meet the daily needs of the rural area.	Rostrevor (2,788)	Newtownhamilton(800)	Clough (279)
		Bessbrook (2,739)	Meigh (770)	
		Crossgar (1,892)	Annsborough (767)	
		Annalong (1,796)	Ballyholland (664)	
		Hilltown (1,698)	Mullaghbane (596)	
		Ardglass (1,643)	Ballymartin (506)	
		Dundrum (1,551)	Forkhill (498)	
		Drumaness (1,344)	Strangford (495)	
		Camlough (1,081)	Jonesborough (465)	
		Mayobridge (1,068)	Ballykinler (447)	
		Killough (843)	Cullyhanna (326)	
Tier 4 - Small Settlements	A focal point for the rural community which usually contain a limited level of goods, services, or community resources.	The Spa (583)	Loughinisland (218)	Killeen (108)
		Darragh Cross (490)	Maghera (211)	Saul (97)
		Newtowncloghoge (457)	Burrenbridge (199)	Ballymadeerfy (69)
		Shrigley (437)	Kilclief (191)	Coney Island (57)
		Ballyhornan (369)	Clonvaraghan (186)	Altnamacken ***
		Belleek (375)	Drumaroad (183)	Ballymoyer ***
		Whitecross (352)	Lislea (180)	Ballyward***
		Drumintee (337)	Attical (171)	
		Kilcoo (335)	Ballynoe (169)	Chapeltown ***
			Glassdrumman, Co Armagh (165)	Dechomet***
		Sheeptown (333)		
		Annacloy (318)	Dunnaval/Ballyardle (161)	
		Raholp (315)	Glen (147)	Dorsey ***
		Kilmore (310)	Longstone (147)	
		Bryansford (306)	Barnmeen (136)	Finnis***
		Lurganare (294)	Ballyalton (132)	Greencastle ***
		Seaforde (263)	Mullaghglass (125)	Jerrettspass ***
		Cullaville (232)	Leitrim (121)	
		Killowen (230)	Silverbridge (112)	
			Glassdrumman / Mullartown (110)	
		Creggan (227)		

### 3. Allowance for Existing Housing Commitments

- 7.18 Regional policy as set out in the SPPS requires an allowance for existing commitments. This includes dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved. As part of the housing allocation process, in line with the SPPS requirement, account has been taken of the level of housing commitment across the district.
- 7.19 Figures for housing commitments are set out in table 7.7. This includes dwellings completed over the period 2020-23, sites with a live planning permission where work has not commenced or where development has commenced and is on-going. Figures for uncommitted zoned housing sites are also included as it is considered there is a high likelihood that these will come forward over the Plan period.
- 7.20 Over the period 2020-23 1,339 dwellings have been built within the district's settlements while 390 dwellings have been built in the countryside. Replacement dwellings have been excluded from the countryside figures as they represent no net gain (see Table 4.6).
- 7.21 Within the district's city and towns the Council's annual Housing Monitor (April 2023) identified a total commitment of 2,467 units (both commenced and not started) alongside a further 3,117 units remaining on zoned land which was not committed. This figure excludes phase 2 lands zoned in Downpatrick (411) and Ballynahinch (427). The zoning of phase 2 lands in Ballynahinch was recommend in the review of the Council's housing evidence base. The overall total for commitments and uncommitted zoned sites within the district's city and towns is 5,606 excluding phase 2 sites or 6,444 including phase 2 sites.
- 7.22 The housing monitor for 2023 indicated that that committed sites alongside uncommitted zoned sites across all the district's settlements could provide 7,384 units excluding phase 2 sites or 8,222 including phase 2 sites (see table 7.7). It is recognised that these may not all be built and as the LDP process moves forward some of the current live planning permissions may lapse and other planning permissions will come forward. The level of commitments will be reviewed again at the Local Policies Plan stage.

**Table 20: Housing Units Completions in Settlements 2020-23**

	2020-21	2021-22	2022-23	Total
<b>City/Main Town</b>				
Newry	138	122	152	412
Downpatrick	7	136	30	173
<b>Sub Total</b>	<b>145</b>	<b>258</b>	<b>182</b>	<b>585</b>
<b>Towns</b>				
Newcastle	32	29	25	86
Warrenpoint/Burren	2	23	16	41
Kilkeel	18	4	9	31
Ballynahinch	40	5	40	85
Saintfield	3	2	2	7
Killyleagh	1	8	4	13
Castlewellan	10	5	0	15
Crossmaglen	0	10	14	24
<b>Sub Total</b>	<b>106</b>	<b>86</b>	<b>110</b>	<b>302</b>
<b>Villages</b>				
Annalong	29	23	23	75
Annsborough	0	26	1	27
Ardglass	0	23	1	24
Ballyholland	0	1	0	1
Ballykinler	0	0	6	6
Ballymartin	0	0	0	0
Bessbrook	0	0	1	1
Camlough	0	1	2	3
Clough	0	1	1	2
Crossgar	6	1	0	7
Cullyhanna	0	0	4	4
Drumaness	1	0	0	1
Dundrum	0	4	1	5
Forkhill	1	0	0	1
Hilltown	8	16	10	34
Jonesborough	0	3	13	16
Killough	0	10	37	47
Mayobridge	15	1	0	16
Meigh	0	0	0	0
Mullaghbane	0	0	1	1
Newtownhamilton	0	0	0	0
Rostrevor	5	1	2	8
Strangford	1	5	10	16
<b>Sub Total</b>	<b>66</b>	<b>116</b>	<b>113</b>	<b>295</b>

	2020-21	2021-22	2022-23	Total
<b>Small Settlements</b>				
Altnamacken/Corntamlet	0	0	2	2
Annacloy	2	5	15	22
Attical	1	5	0	6
Ballyalton	0	6	2	8
Ballyhornan	0	5	7	12
Ballymaderphy	0	0	9	9
Ballymoyer	0	0	0	0
Ballynoe	0	0	0	0
Ballyward	0	0	0	0
Barnmeen	3	5	0	8
Belleek	0	0	0	0
Bryansford	0	4	0	4
Burrenbridge	0	0	0	0
Carricknab	0	0	0	0
Chapeltown	0	0	0	0
Clonvaraghan	0	0	0	0
Coney Island	0	0	0	0
Creggan	0	0	0	0
Cullaville	0	0	0	0
Darragh Cross	8	0	0	8
Decomet	2	0	0	2
Derryboye	0	0	0	0
Dorsey	0	0	0	0
Drumaghlis	0	0	0	0
Drumaroad	0	0	0	0
Drumintee	0	0	0	0
Dunnaval/Ballyardle	1	1	1	3
Finnis	0	0	0	0
Glassdrumman Co Armagh	1	0	0	1
Glassdrumman/Mullartown	0	0	0	0
Glen	0	0	11	11
Greencastle	0	0	0	0
Jerrettspass	0	0	0	0
Kilclief	0	0	0	0
Kilcoo	7	2	2	11
Kileen	0	0	0	0
Killowen	1	0	0	1
Kilmore	0	0	0	0

	2020-21	2021-22	2022-23	Total
<b>Small Settlements</b>				
Leitrim	0	0	0	0
Lislea	0	0	0	0
Longstone	4	0	0	4
Loughinisland	0	0	0	0
Lurganare	0	0	0	0
Maghera	0	0	9	9
Mullaghglass	0	0	0	0
Newtownclogogue	2	7	5	14
Raholp	0	2	0	2
Saul	1	0	1	2
Seaforde	0	6	0	6
Sheeptown	1	0	0	1
Shrigley	0	0	0	0
Silverbridge	0	0	0	0
The Spa	4	1	0	5
Tullyherron	0	0	0	0
Whitecross	0	5	1	6
<b>Sub Total</b>	<b>38</b>	<b>54</b>	<b>65</b>	<b>157</b>
<b>Total</b>	<b>355</b>	<b>514</b>	<b>470</b>	<b>1,339</b>

Those settlements highlighted in red are proposed to be de-designated under the revised LDP settlement hierarchy.

- 7.23 Table 7.3 above highlights that between April 2020 and April 2023 1,339 housing units have been completed within settlements.

## 4. Urban Capacity Study

- 7.24 The SPPS states that Councils should assess the potential for future housing growth within the urban footprint and the capacity for different types and densities. An interim urban capacity has been undertaken to inform the Plan Strategy Housing Growth Strategy, this study will be updated later in the process as part of the evidence base to inform the Local Policies Plan. The interim urban capacity study has been undertaken within the City, main and towns over 5,000 population and entails the identification of sites within the urban footprint that are considered suitable for new residential development. The study sets out the potential yield from these identified sites along with an estimate of potential yield from unidentified 'windfall' sites.
- 7.25 The RDS requirement is to locate 60% of future housing growth within the urban footprints of settlements in excess of 5,000. A significant proportion of the larger urban capacity sites that were zoned in the ADAP 2015 and BNMAP 2015 have been developed, as a consequence the majority of remaining capacity on zoned sites within the district's larger settlements is located within the urban fringe (75%).
- 7.26 The urban capacity study, based on the 2020 Housing Monitor, estimated that urban capacity sites over 0.1 ha could provide approximately an additional 681 units on unzoned land. The majority of this capacity (425 (62%)) is located within Newry and Downpatrick.

**Table 21: Summary of Urban Capacity Results**

Settlement	Type 1 Area (ha)	Type 1 Estimated Yield	Windfall all Type 3	Windfall Type 4	Total Windfall	Total Yield (Type 1 & Windfall)
Newry	7.21	257	93	33	126	383
Downpatrick	9.51	168	43	11	54	222
Newcastle	3.18	63	39	0	39	102
Warrenpoint	0.71	19	26	24	50	69
Kilkeel	5.49	106	42	10	52	158
Ballynahinch	3.51	68	27	16	43	111
<b>Total</b>	<b>29.61</b>	<b>681</b>	<b>270</b>	<b>94</b>	<b>364</b>	<b>1,045</b>

## 5. Allowance for Windfall Housing

- 7.27 The SPPS highlights that windfall potential arising from previously developed land within the urban footprint is central to the assessment of future housing land requirement and is a key element of the urban capacity. An initial estimate of the potential housing return from previously developed land and smaller vacant pieces of land within the urban footprint which might become available for housing during the lifespan of the LDP indicates approximately 364 additional housing units within the district's city and town over 5,000 population.
- 7.28 It is expected that there will also be some windfall completions that will occur outside the larger settlements, however settlements under 5,000 are not included in the urban capacity exercise. In order to establish what level of windfall might be appropriate within these smaller settlements a review of past completions on small, unzoned sites was undertaken.

**Table 22: Historical Windfall: Completions outside of housing zonings within the urban footprint between August 2010 and March 2023.**

Settlement	Total Completions (Units)	Completions on Unzoned Land		Sites 0.1 ha and < 5 units	
		Units	% Total Completions	Units	% Total Completions
Newry	1,426	600	42.1%	113	7.92%
Downpatrick	488	227	46.5%	45	9.22%
Ballynahinch	409	188	45.96%	10	2.44%
Kilkeel	216	105	48.61%	44	20.37%
Newcastle	444	288	64.86%	59	13.29%
Warrenpoint/Burren	179	77	43.02%	62	34.63%
Saintfield	168	153	91.07%	7	4.17%
Killyleagh	73	27	36.99%	11	15.07%
Castlewellan	128	94	73.44%	7	5.47%
Crossmaglen	104	8	7.69%	7	6.73%
<b>Total</b>	<b>3,635</b>	<b>1,767</b>		<b>365</b>	
<b>Average</b>			<b>50.02%</b>		<b>11.9%</b>

- 7.29 The Housing Review suggested the application of a percentage allowance based on the average of all completions (see urban capacity study). As detailed in Table 7.6 the application of a 12% allowance to settlements under 5,000 results in an additional windfall allowance of 277 dwellings.



**Table 23: Windfall Supply from settlements with less than 5,000 population**

<b>Settlement</b>	<b>Potential (commitments and zoned)</b>	<b>Potential less non-implementation allowance</b>	<b>Windfall assumption (12% of potential delivery)</b>
Saintfield	43	39	5
Killyleagh	105	98	12
Castlewellan	26	25	3
Crossmaglen	215	204	24
Villages	1,563	1,452	174
Small Settlements	509	490	59
<b>Total</b>	<b>3,635</b>	<b>365</b>	<b>277</b>

Source: Lichfields' analysis

## **6. Application of a Sequential Approach and Identification of Suitable Sites for Settlements Over 5,000 Population**

- 7.30 The Regional Development Strategy 2035 (RDS) sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites within the urban footprint of settlements greater than 5,000 population. The RDS defines the urban footprint as the continuous built-up area of the settlement. This includes land at the edge of the settlement where it forms part of the curtilage of a building however undeveloped zoned land at the edge of the settlement is excluded.
- 7.31 The SPPS states that housing allocations in LDPs should be informed by the application of a sequential approach to housing development in those settlements with a population over 5,000, in order to maximise development opportunities within the urban footprint and deliver compact urban forms.
- 7.32 As is highlighted in proposed settlement hierarchy the district contains a number of settlements that exceed this 5,000 threshold, these include: Newry City, Warrenpoint/ Burren, Kilkeel, Downpatrick, Ballynahinch and Newcastle.

### **Uncommitted zoned housing sites from current extant area plans**

- 7.33 Approximately 179 hectares of uncommitted zoned housing lands (no extant planning permission) exist within the district's city and towns over 5,000 population. This includes land within the urban footprint and the urban fringe. It is estimated that these lands could accommodate approximately 3,733 housing units. Breaking down this figure by settlement we see that Newry has the potential for 713 units while Downpatrick has potential for 1,581 units.

Ballynahinch also has a significant level of uncommitted zoned housing land that could deliver 595 units.

**Table 24: Uncommitted Zoned Sites HM 2020**

Settlement	Uncommitted Zoned Sites	
	Area	Units
Newry	26.8	713
Downpatrick	74.94	1,581
Newcastle	4.62	96
Warrenpoint/Burren	17	372
Kilkeel	21.57	376
Ballynahinch	34.42	595
<b>Total</b>	<b>179.35</b>	<b>3,733</b>

Source: Housing Monitor 2020

- 7.34 Table 25 below sets out an estimate of the total housing potential within the district's settlements over 5,000 population. This highlights that some 3,095 units (approximately 42%) out of a total potential of 7,454 would be delivered within the urban footprint.

**Table 25: Housing Potential urban capacity, windfall, urban fringe lands and committed sites (HM 2020)**

	Committed			Uncommitted Zoned			UC Units	Total Windfall
	Urban Footprint	Urban Fringe	Total	Urban Footprint	Urban Fringe	Total		
Newry	368	919	1287	489	224	713	257	126
Downpatrick	347	101	448	152	1,429	1,581	168	54
Newcastle	145	58	203	4	92	96	63	39
Warrenpoint/Burren	122	65	187	122	250	372	19	50
Kilkeel	81	75	156	177	199	376	106	52
Ballynahinch	43	352	395	0	595	595	68	43
<b>Total</b>	<b>1,106</b>	<b>1,570</b>	<b>2,676</b>	<b>944</b>	<b>2,789</b>	<b>3,733</b>	<b>681</b>	<b>364</b>

Source: Housing Monitor 2020 and Urban Capacity Study

## 7. NIHE Housing Needs Assessment and Strategic Housing Market Analysis (SHMA)

### Strategic Housing Market Analysis: NI Summary

- 7.35 As detailed in Section 4 the Newry, Mourne and Down LGD includes all of the Newry HMA while the remainder forms part of the Belfast Metropolitan HMA. Section 4 of this document provides an overview of the NIHE SHMA methodology used to identify housing need and details the need across these two market areas. The NI summary report subsequently sets out projected housing need by LGA and this has been used to inform the level of housing need across the district over the 15 year LDP period.
- 7.36 Based on the projected trend in household growth, for Northern Ireland as a whole, new dwelling requirements over the decade 2020 to 2030 are projected to average 6,240 per annum, falling to 4,460 per annum in the five years between 2030 and 2035. As a point of comparison, it is noted that, over the historical 10-year period from 2010 to 2020, new dwelling completions across Northern Ireland averaged 6,280 per annum.
- 7.37 Within Newry, Mourne and Down District the NIHE SHMA notes that the trajectory of annualised new dwelling requirements follows the Northern Ireland pattern, i.e. higher in the first 10 years from 2020 to 2030 and slower in the five years from 2030 to 2035.

**Table 26 NMDDC New Dwelling Requirement, net stock model, no backlog, 2020-2035**

	Annualised			Total
	2020-2030	2030-2035	2020-2035	2020-2035
Newry, Mourne and Down	690	520	630	9,490
N Ireland	6,240	4,460	5,640	84,670

Source: NIHE SHMA

**Table 27: New dwelling requirement and components by LGD, net stock model with backlog, LGDs, medium household growth scenario, 2020-2035**

	Households	Net backlog	Other changes	Total
Newry, Mourne and Down	8,490	1,140	1,000	10,630
N Ireland	68,610	10,940	16,060	95,620

Source: NIHE SHMA

**Table 28: New dwelling requirement by tenure, LGDs, including backlog, medium household growth scenario, 2020-2035**

	Market		Intermediate		Social		All
Newry, Mourne and Down	6,540	69%	1,570	17%	2,520	14%	10,630
N Ireland	54,890	65%	15,450	18%	25,280	17%	95,620

Source: NIHE SHMA

### Allocation of Housing to Settlement Tiers and the Countryside

- 7.38 As set out in the Key Issue 3 of the POP the proposed growth strategy seeks to make progress towards achieving the RDS target of 60% focusing large scale housing in the hubs and towns. It also seeks to sustain the villages with a degree of housing development whilst providing for small scale development and infilling within small settlements.
- 7.39 In order to ensure the housing requirement can be met, the Plan Strategy proposes an indicative strategic housing allocation of 12, 863 units. This takes account of completions, existing commitments and includes an allowance for urban capacity and windfall.

**Table 29: Housing Allocation to Settlements Tiers and the Countryside**

Tier	Allocation (%)	Allocation (Number) 2020-2035
City/Main Town	38%	4,923
Town	27%	3,497
Villages	16%	2,032
Small Settlements	6%	725
Countryside	13%	1,689
	100%	12,863

**Table 30: Housing Land Supply**

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
Camlough	3	22	14	41				77	80
Mayobridge	16	3	1	19				23	39
Killough	47	16	12	0				28	75

Newtownhamilton	0	4	21	40				65	65
Meigh	0	2	9	0				11	11
Annsborough	27	14	0	0				14	41
Ballyholland	1	0	14	31				45	46
Mullaghbane	1	0	0	11				11	12
Ballymartin	0	9	0	0				9	9
Forkhill	1	5	6	45				56	57
Strangford	16	38	6	0				44	60
Jonesborough	16	15	4	18				37	53
Ballykinler	6	17	2	0				19	25
Cullyhanna	4	8	7	21				36	40
Clough	2	5	8	0				13	15
Sub Total	<b>295</b>	<b>453</b>	<b>308</b>	<b>530</b>	<b>272</b>		<b>174</b>	<b>1,737</b>	<b>2,032</b>
Small Settlement	<b>157</b>	<b>321</b>	<b>143</b>	<b>45</b>	<b>0</b>		<b>59</b>	<b>568</b>	<b>725</b>
<b>Settlement Total</b>	<b>1,339</b>	<b>1,834</b>	<b>1,858</b>	<b>3,692 (4,530)</b>	<b>294</b>	<b>681</b>	<b>641</b>	<b>9,000(9,838)</b>	<b>10,339 (11,177)</b>
<b>Countryside</b>	<b>390</b>	N/A	N/A	N/A		N/A	N/A	<b>1,296</b>	<b>1,686</b>
<b>District Total</b>	<b>1,729</b>	<b>1,834</b>	<b>1,858</b>	<b>3,692 (4,530)</b>	<b>294</b>	<b>681</b>	<b>641</b>	<b>10,296 (11,134)</b>	<b>12,025 (12,863)</b>

**Table 31: Housing Supply Adjustments for Non-Implementation**

		No. Dwellings	Non-Implementation Allowance		Expected Delivery
Completions 2020-2023	Settlements	1,339	0%	-	1,339
	Countryside	390		-	390
Commitments	Under Construction	1,834	10%	-	1,834
	Extant Permission	1,858		186	1,672
Zoned Sites	Phase 1	3,709		369	3,338
	Phase 2	838		84	754
Mixed Use Zoning		294		29	265
Urban Capacity Study		681		68	613
Windfalls		641	0%	-	641
Countryside Supply		1,296	0%	-	1,296
Total including Phase 2		<b>12,863</b>		<b>736</b>	<b>12,127</b>
Total excluding Phase 2		<b>12,025</b>		<b>652</b>	<b>11,373</b>

## 8.0 Strategic Housing Policies

- 8.1 The following section sets out selected housing policies where a different approach has been taken to that indicated in the POP preferred option or key issue, and/or where amendments to existing planning policies have been made which were not identified in the POP Policy Review table. Table 8.1 below also sets out housing policies alongside current policy provision within planning policy statements and the SPPS.

### Housing in Settlements

#### Policy HOU5 Affordable Housing

- 8.2 The preferred approach set out at POP stage was to require all housing sites over a certain threshold to provide a proportion of social housing. NIHE initially suggested that a 20% proportion could be required for developments of 50 units or more (1 hectare or more) or 25 in urban areas experiencing high need and 10 units or more in rural areas.
- 8.3 Following feedback from the NIHE during the public consultation on the POP and subsequent discussions, the thresholds as set out in the POP were subject to further review and analysis.
- 8.4 The NIHE expressed the view that a lower threshold than 50 should be considered to assist the delivery of mixed tenure developments and ensure that windfall development would contribute to meeting affordable housing need.
- 8.5 Using the 2020 housing monitor an analysis of committed housing sites and zoned sites across the settlement tiers was undertaken to assess how different thresholds would have influenced the delivery of affordable housing had they been in place. This analysis supported a two tier approach as suggested by the NIHE and assisted in the identification of thresholds that aligned with the size of housing schemes being delivered across the Council area as follows:
- Within Newry City and the district's towns, on sites of 0.5ha or comprising of 10 units or more, provision should be made for a minimum of 20% affordable housing.
  - Within the district's villages and small settlements on sites of 0.2ha or comprising of 5 residential units or more, provision should be made for a minimum 20% affordable housing.



## Policy HOU7 Adaptable and Accessible Homes

- 8.6 The preferred approach set out at POP stage was the requirement for at least 20% of homes across all tenures, on sites of 50 or more dwellings to be built to lifetime homes standards. This would also require that 5% of units on sites of 50 or more should be wheelchair accessible.
- 8.7 In responding to the POP the NIHE stated that there would not be sufficient schemes of this size to meet the demand for lifetime homes standard housing. Due to the projected increase in the age profile of the district they expressed the view that all new housing should meet lifetime homes standards and highlighted that lifetime homes standard housing is often a requirement for all housing in development plans in GB.
- 8.8 Existing NI Building Regulations as set out in Technical Booklet R do require a certain level of accessibility and address a number of aspects including:
- An access ramp to dwellings;
  - Internal movement in terms of the width of ground floor hall/entrance corridor;
  - The provision of downstairs WC; and
  - Specified height of switches and sockets.
- 8.9 Within the English Building Control Regulations similar to Northern Ireland there is a requirement for all dwellings to provide suitable access to those visiting the property. The English regulations however go further, optional requirements M4(2) and M4(3) set higher design standards in terms of an adaptable and accessible buildings. An optional requirement will only apply where a condition that one or more dwellings should meet the relevant optional requirement is imposed on new development as part of the process of granting planning permission. There is therefore a mechanism through which lifetime homes standards are conditioned through the Plan process and signed off by building control.
- 8.10 There currently is no similar provision covering optional requirements and linking them to planning approval within Technical Guidance 'R' of the NI Building regulations. It was subsequently concluded that an update to the Building Regulations would be required to enable the delivery of full lifetime homes standard dwellings through the Planning system.
- 8.11 The proposed policy approach will seek to deliver dwellings that are flexible, adaptable and accessible with consideration being given at design stage to the dwelling type, internal room layout and plot size. The policy will require

10% of dwellings on developments of 10 dwellings or more to provide a wheelchair accessible environment.

## **Housing in the Countryside**

### **Policy COU1 Dwellings in Existing Cluster**

- 8.15 In reviewing the policy provision for the development of a dwelling within an existing cluster the lack of any justification and amplification text to this policy was considered to be an omission that should be addressed to assist understanding and interpretation of the policy.
- 8.16 Greater clarity has now been provided by setting out the definition of a cluster of development; highlighting that a focal point will be expected to be a focus of community activity; stating that sites at a junction of private road and laneway will not be eligible for consideration under the policy and indicating that proposals physically separated from the cluster will not be considered eligible under the policy.

### **Policy COU3 Affordable Housing in the Countryside**

- 8.17 The district continues to face challenges in meeting affordable housing need across the whole council area and particular in the smaller settlements and rural areas. As highlighted in paragraphs 8.9-8.14 above, a new affordable housing policy to address need within our settlements has been brought forward. This provision has been enhanced by carrying forward and amending current policy as set out within Policy CTY5 which allows for the development of no more than 14 dwellings adjacent to or near a small settlement.
- 8.18 The council recognise that CTY5 is an exceptions policy and in line with the LDP Housing Strategy the majority of land for housing will be located within the district's settlements. Nonetheless the Council consider CTY5 has a role to play in addressing affordable housing need in the district's rural areas and should be brought forward.
- 8.19 Through discussion with Members at the rural planning policy workshops and in discussion with the NIHE a revised approach more closely aligned to the size of the district's rural settlements has been developed. The current threshold of 14 dwellings has been revised to allow for up to a maximum of 20 dwellings in the case of a village whilst for small settlements a maximum of 14 dwellings will continue to apply.
- 8.20 The revised policy also enables a broader range of providers to bring forward affordable housing proposals. Community led housing organisations and other

housing providers, partners or initiatives supported buy the NIHE will be able to make applications under the council's updated policy.

- 8.21 A further enhancement to the policy allows for more than one group of dwellings to be provided, consideration will be given to more than one group of dwellings provided the combined total is no greater than the permitted maximum allowed under the policy. This will support the delivery of smaller schemes and enable the consideration of alternative or additional site.

### **Policy COU6 Ribbon Development**

- 8.22 At POP stage it was proposed that consideration would be given to defining the size of the gap site as well as what constitutes a build-up frontage. Through discussion with officers within the Planning Development Management section and the rural policy workshops it was concluded that setting out the size of a small gap would not be desirable as it could make the assessment a more mathematical based approach that would reduce flexibility in decision making.
- 8.23 Additional clarity has been provided in respect of what constitutes a continuously built-up frontage. The reference to a line of three or more buildings is carried forward and enhanced with the addition of reference to permanent construction and the requirement that at least two of the buildings must be dwellings.
- 8.24 Within the justification and amplification to the policy additional clarity has been provided on the visual linkage of buildings, the extent of a building's curtilage and instances where an access does not form part of a frontage.

### **Policy COU8 Dwellings on Farms**

- 8.25 During the Member's workshops there was discussion on the policy wording covering development opportunities being sold off or transferred. The subdivision of farms amongst siblings and in other genuine circumstances was raised as an issue. It was acknowledged that the subdivision of an estate can occur as part of inheritance or gifting and it would be reasonable to allow for this as an exception within the policy. Within the justification and amplification clarity has subsequently been provided on the transfer or subdivision of lands. The new wording within the justification and amplification states that the transfer of land occurring as part of the division of an estate among benefactors or as a gift will be treated as an exception to the policy.
- 8.26 Discussion at Member's workshops also covered the requirements for an active and established business and highlighted that there were instances

where farms had fallen below the required period of activity due to illness, bereavement or for other reasons beyond the control of the farmer. As part of the discussion it was indicated that the PAC had allowed appeals where an appellant was able to demonstrate the required level of activity had been sustained prior to this situation occurring. Following consideration of this issue the clarification text under active and established farm business has been expanded to advise applicants to account for any period of time where the farm business was not active and not in receipt of single farm payment due to circumstances beyond their control.

- 8.27 Further clarity has been provided in respect of the running of equine businesses and qualification under this policy. Those businesses that involve horse breeding are will be afforded the same benefits as a active and established farm however other equine related businesses such as horse training and the operation of livery yards, trekking centres and riding schools will not be eligible for consideration under this policy and will be assessed under Policy COU5 Dwellings for Non-Agricultural Rural Enterprises.

## 9.0 Soundness

- 9.1 The draft Plan Strategy has been prepared to take due regard to the meeting the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the strategic policies and proposals for housing development is regarded as sound because it meets the various tests of soundness summarised below.

**Table 32: Soundness**

<b>Procedural Tests</b>	
P2	Strategic policies HS1 Housing Allocation, HS2 Protection of Zoned Housing Land and HS3 Management of Housing Supply, CS1 Development in the Countryside and the housing operational policies (HOU1-HOU9) have evolved following from the position set out in the POP and as outlined in the POP Consultation Report. Section 3 of this document sets out how the POP Key Issues on Housing have been subsequently taken forward and finalised for inclusion in the LDP draft Plan Strategy.
P3	The housing strategy and operational housing policies have been subject to the Sustainability Appraisal. Further detail are set out in the Sustainability Appraisal Report.
<b>Consistency Tests</b>	
C1	The housing strategy and operational housing policies have taken account of the RDS particularly RG6 -8 and SFG 12-13. Together with the revised HGI figures published by DFI in September 2019.
C2	The housing strategy and operational housing policies have taken account of Newry, Mourne and Down's Community Plan, particularly in relation to outcome which seeks to deliver a clean, quality and sustainable environment. The level of quality housing is an indicator for this outcome.
C3	The housing strategy and operational housing policies have taken account of the SPPS, in particular paragraphs 6.136-6.147 and 6.73.
C4	The housing strategy and operational housing policies have had regard to the existing development plans insofar as they relate to housing development.
<b>Coherence and effectiveness Tests</b>	
CE1	The housing strategy and operational housing policies have taken account of adopted and emerging LDPs
CE2	The housing strategy and operational housing policies are based on a robust evidence base including POP and consideration of representations, urban capacity study, NIHE reports (HIP and SHMA) and engagement with statutory stakeholders.
CE3	The monitoring framework within Chapter 7 of the draft Plan Strategy outlines the following objectives in relation to housing: To provide for approximately 11,000 new homes by 2035 across a mix of housing type, size and tenure in accessible locations.
CE4	Housing provision will be reviewed at Plan Review stage, with the potential for the re-designation of phase 1 housing land and the release of phase 2 housing land in larger settlements to take account of changing circumstances. Housing policies will also be reviewed to assess whether they are achieving their intended aims.

## 10.0 Evolution of Policies

Existing Policy	Regional Planning Policy	POP Preferred Option	Comments received to POP	Draft Plan Strategy Policy
<p>The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015 Taking into account the RDS Broad Evaluation Framework and the Plan's overall growth strategy housing has been allocated to focus residential development on the hubs and sustain, consolidate and regenerate the smaller towns and villages.</p> <p>Newry &amp; Mourne Newry City – 4,655 Local Towns – 2,530 Villages – 2,250 Small Settlements - 820 Open Countryside – 1,995 N&amp;M Total 12,250</p> <p>The Ards and Down Area Plan 2015 The RDS allocates 10,500 as an appropriate Housing Growth</p>	<p>6.139 of the SPPS states that housing allocations in Local Development Plans should be informed by: RDS Housing Growth Indicators; Use of the RDS Housing Evaluation Framework; Allowance for existing commitments; Urban capacity studies; Allowance for windfall housing; Application of sequential approach; Housing Needs Assessment/Housing Market Analysis; and Transport assessments.</p>	<p><b>Key Issue 2 – Quantity of Housing Land</b> Retain the current level of zoned housing land.</p> <p><b>Key Issue 3 – Distribution of Housing Land</b> City/Main town 32% Towns 30% Villages 12% Small Settlements 5% Countryside 21%</p>	<p>There was general consensus that the projected DfI HGI figure of 15,092 was too restrictive, HGIs were for guidance and did not represent a cap.</p> <p>There was broad support for a balanced approach to the distribution of housing land, however there was a general concern that too much housing would be allocated to the countryside under the Council's preferred option.</p> <p><b>DfI Strategic Planning</b> The Department highlighted that the options provided related to the distribution of the HGI rather than the distribution of housing land. They also highlighted the RDS</p>	<p>Revised HGIs published after the POP have subsequently guided the Council's policy approach.</p> <p>In response to comments received further analysis of the levels of committed housing within settlements was undertaken, including an urban capacity exercise together with a review of completions in the countryside.</p> <p>This resulted in a revised approach as set out below: <b>HS1 Housing Land Allocation</b> City/Main Town 38% Towns 27% Villages 16% Small Settlements 6% Countryside 13%</p> <p>An independent review of the Council's housing need over the plan period was commissioned and this reinforced the level of need as set out in the RDS Housing Growth Indicators.</p>

<p>Indicator for the Down District for the period 1998-2015. It is the task of the Plan to distribute growth allocated to each district in accordance with the strategic planning guidance in the RDS.</p> <p>A total of 240 hectares of land are zoned for housing in the Down District.</p> <p>Downpatrick – 141 hectares  Ballynahinch - 68 hectares  Newcastle – 31 Hectares</p> <p>Land in Phase 2 in Downpatrick will not be released until the transportation infrastructure associated with the Phase 1 housing has been completed.</p> <p>Within the settlement limits as designated for the villages there is capacity to accommodate approximately 2,500 dwellings.</p>			<p>objective of reinforcing the leading roles of Hubs.</p> <p><b>DfI Transport Planning and Modelling Unit</b>  TPMU disagreed with the Council's preferred option stating that 21% of housing in the countryside did not equate to sustainable development.</p> <p><b>NI Housing Executive</b>  The NIHE indicated they would support a combination of option two and three with growth directed to the hubs and towns and the open countryside receiving a smaller proportion of growth than under the preferred option.</p>	
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<p>The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015</p> <p>Ards and Down Area Plan 2015.</p>	<p>6.136 of the SPPS states that the policy approach to housing must be to facilitate an adequate and available supply of quality housing to meet the needs of everyone.</p>	<p>Not raised</p>	<p>Not raised</p>	<p><b>HS2 Protection of Zoned Housing Land</b></p> <p>The Plan will support the development of non-residential uses on land zoned for housing only in the following circumstances: where the proposed use forms part of a major housing development and is both ancillary and integral to that development.</p>
<p>The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015</p> <p>Ards and Down Area Plan 2015.</p>	<p>6.140 of the SPPS states that a plan monitor and manage approach is necessary to ensure</p>	<p><b>Key Issue 2 – Quantity of Housing Land</b></p> <p>Under this issue it was indicated that a phased approach to the release of housing land would be introduced with surplus land held in reserve to meet long term-housing need.</p>	<p>Mixed views were expressed in terms of a phased approach to zoning. Some stated that a phased approach was wrong and was akin to de-zoning others felt that de-zoning should be considered.</p>	<p><b>HS3 Management of Housing Supply</b></p> <p>The Plan will support the management of housing supply over the Plan period, through zoned housing land within Newry City and the district's towns which will be released in two phases.</p>
<p><b>Planning Policy Statement 7 – Quality Residential Environments</b></p>				
<p><b>QD1: Quality in New Residential Development</b></p> <p>Sets out policy criteria for the assessment of new residential</p>	<p>6.136 of the SPPS sets out a broad strategic policy approach to promote more sustainable housing development and provide for mixed housing development</p>	<p>Not raised as key issue in POP.</p> <p>Preliminary review of Operational Planning Policy (PROPP) -</p>	<p><b>DfI</b> - The Department welcomes policy approaches that support the SPPS objective of good quality housing that supports the creation of</p>	<p><b>HOU1: Quality in Residential Development.</b> See Plan Strategy document.</p>



development in relation to site context, characteristics, layout, neighbourhood facilities, form, material and detailing, density, landscape design, open space. Movement, parking, privacy and security from crime.	to support more balanced communities. 6.137 details what Planning Authorities must deliver and refers to increased housing density without town cramming, sustainable forms of development, good design and balanced communities. 6.139 outlines the brad methodology for allocating housing land through the LDP.	Carry forward Policy QD1 taking account of the provisions of the SPPS.	balanced communities and offers a variety of house types and tenures	
<b>QD2: Design Concept Statements, Concept Master Plans and Comprehensive Planning</b> Sets out the criteria for the submission of design concept statements, concept master plans and comprehensive planning as tools in achieving high quality housing schemes that are design led and responsive to site characteristics and opportunities.	6.137 of the SPPS states that a design concept statement should be sought and agreed with the developer . The SPPS does not provide the same level of detail as policy QD2 and it does not differentiate between design concept statements for all housing development and concept master plans for larger developments.	Not raised as key issue in POP.  PROPP – Carry forward Policy QD2 taking account of the provisions of the SPPS. The thresholds within QD2 for submission of a design masterplan will be reviewed.	No comments received to this policy.	<b>HOU2: Design Concept Statements</b> The Council will require submission of a Design Concept Statement, or where appropriate a Concept Master Plan, to accompany all planning applications for residential development. A Concept Master Plan will be required for planning applications involving: a) 50 dwellings or more; or b) The development, in part or full, of sites of 2ha or more zoned for housing in the local development plan; or c) Residential development on any other site of 2ha or more.

				<p>In the case of proposals for the partial development of a site zoned for housing the Concept Master Plan will be expected to demonstrate how the comprehensive planning of the entire zoned area is to be undertaken.</p> <p>Any proposal for housing that would result in unsatisfactory piecemeal development will not be permitted, even on land identified for residential use in the local development plan.</p>
<b>Addendum to PPS7: Residential Extensions and Alterations</b>				
EXT1: Residential Extensions and Alterations	6.137 of the SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential developments including residential extensions and alterations.	<p>Not raised as key issue in POP.</p> <p>PROPP – Carry forward Policy EXT1 taking account of the provisions of the SPPS.</p> <p>Consideration will be given as to whether further clarification is required in regard to ancillary accommodation and inclusion of criteria on bin storage.</p>	No comments received to this policy.	<p><b>HOU3: Residential Extensions and Alterations</b></p> <p>Planning permission will be granted for a proposal to extend or alter a residential property, including those located in the countryside, where all of the following criteria are met:</p> <p>(a) The scale, massing, design and external materials of the proposal are sympathetic with the built form and appearance of the existing property and will not detract from the appearance and character of the surrounding area;</p>

		It is proposed to remove Annex B and C.		<p>(b) The proposal does not unduly affect the privacy or amenity of neighbouring residents;</p> <p>(c) The proposal will not cause the unacceptable loss of, or damage to trees or other landscape features which contribute significantly to local environmental quality; and</p> <p>(d) Sufficient space remains within the curtilage of the property for recreational and domestic purposes including the parking and manoeuvring of vehicles.</p> <p>Proposals to extend or alter other residential uses, such as residential/nursing homes, hostels and holiday accommodation, as well as proposals to develop ancillary accommodation (within existing residential units), are also required to meet the above criteria.</p>
<b>Annex A: Guidance for Residential</b>	Detail not provided in the SPPS.	PROPP – Carry forward	No comments received.	Supplementary Planning Guidance

<b>Extensions and Alterations</b>				
<b>Addendum to PPS7: Safeguarding the Character of Residential Areas</b>				
<b>LC1: Protecting Local Character, Environmental Quality and Residential Amenity (in addition to Policy QD1)</b> Sets out criteria in relation to density, pattern of development as well as specifying space standards for new dwellings and apartments.	The SPPS is more strategic and less prescriptive than the PPS7 addendum. It generally accords with Policy LC1 but does not provide space standards.	Not raised as key issue in POP.  PROPP – Carry forward Policy LC1 taking account of the provisions of the SPPS.	No comments received to this policy.	Policy LC1 has been included within <b>HOU1: Quality in Residential Development.</b>
<b>LC2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments (in addition to QD1).</b> Sets out five criteria that must be met: No adverse effect on local character; Maintains or enhances the form, character, features, design and setting; Original property greater than 150 square metres; All flats or apartments are self-contained; and	The SPPS is more strategic and less prescriptive than the PPS7 addendum. It does however encourage sustainable forms of development.	Not raised as key issue in POP.  PROPP – Carry forward Policy LC2 taking account of the provisions of the SPPS.	No comments received to this policy.	<b>HOU4: Conversion or Change of Use of Existing Buildings to Flats or Apartments</b> Planning permission will only be granted for the conversion or change of use of existing buildings to flats or apartments (including living over the shop and those for houses in multiple occupation ) where all the criteria set out in Policy HOU1, and all the additional criteria below are met: <ul style="list-style-type: none"> <li>There is no adverse effect on the local character, environmental quality, or</li> </ul>

No flat or apartment wholly to the rear of the property.				<p>residential amenity of the surrounding area;</p> <ul style="list-style-type: none"> <li>• The proposal maintains or enhances the form, character and architectural features, design and setting of the existing building;</li> <li>• The original property is greater than 150 square metres gross internal floorspace;</li> <li>• All flats or apartments (with the exception of Houses in Multiple Occupation (HMOs) are self-contained (i.e. having separate bathroom, wc and kitchen available for use only by the occupiers);</li> <li>• The development does not contain any flat or apartment which is wholly in the rear of the property and without access to the public street;</li> <li>• There is adequate provision for waste and recycling storage areas that are designed to safeguard amenity; and</li> <li>• Proposals above shops and other business premises do not prejudice the operations of any commercial business below.</li> </ul>
<b>LC3: Permeable Paving in New</b>	6.136 of the SPPS states that a design concept statement	Key Issue 24 addresses flood risk	There was broad support expressed for the use of	New Policy FRD6: Sustainable Drainage Systems

<p><b>Residential Development</b> Promotes the use of permeable paving within new residential development to reduce the risk of flooding.</p>	<p>should be submitted with proposals and it should incorporate sustainable elements such as the use of Sustainable Drainage Systems. The use of SuDS is generally promoted throughout the SPPS.</p>	<p>management. The Preferred Option was to require the use of SuDS through key site requirements or introduce a new policy requiring all new development to incorporate SuDS to address surface water flooding.</p>	<p>Sustainable Drainage Systems, with some respondents suggesting these should be compulsory while others considered this should be encouraged. Different suggestions were also made as to how SuDS should be managed and maintained.</p> <p><b>DfI Water &amp; Drainage Policy Division</b> welcomed the references made to the use of SuDS to help deliver effective drainage at source and reduce flood risk.</p> <p><b>NIHE</b> supported the Council approach detailed in respect of mitigation and climate change and suggested that SuDS should be required in all developments.</p> <p><b>DAERA Natural Environment Division</b> agreed SuDS should be incorporated into the drainage design of new development where appropriate.</p>	
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<b>Annex A: Space Standards</b> Internal floor space standards for apartments and dwellings.	Detail not provided in the SPPS.	Not raised as key issue in POP. PROPP – Carry forward approach.	No comments received.	Supplementary Planning Guidance
<b>Annex E: Definition of an Established Residential Area.</b>	Detail not provided in the SPPS.	Not raised as key issue in POP. PROPP – Carry forward approach.	No comments received.	Supplementary Planning Guidance
<b>PPS12: Housing in Settlements</b>				
<b>PCP1: Increased Density Without Town Cramming</b> A principle rather than a policy but relates to HS1: Living Over the Shops and PPS7. Promotes increased density in housing developments by encouraging compact urban forms and promoting more housing within existing urban areas.	6.137 of the SPPS promotes higher density housing developments in town and city centres and in other locations that benefit from high accessibility to public transport facilities.	Not raised as key issue in POP.  PROPP – Carry forward approach.	No comments received.	<b>HOU3 Residential Extensions and Alterations</b> <b>HOU4 Conversion or Change of Use of Existing Buildings to Flats or Apartments.</b>
<b>PCP2: Good Design</b> A principle rather than a policy and reiterates PPS7. Promotes that all new housing should demonstrate a high quality of design, layout and landscaping.	4.23 – 4.36 of the SPPS outlines good design and place shaping as core planning principles. 6.137 reflects PCP2 and states that all new housing development should demonstrate a high quality of	Not raised as key issue in POP.  PROPP – Carry forward approach.	<b>NIHE</b> - urban design can be important in promoting the principle of a shared society and should be promoted by using guidance, such as, Lifetime Neighbourhoods, Building for Life and	The principle of good design is set out in Strategic Policy <b>SP2 Enhancing Design and Place Shaping</b> and <b>GP1 General Policy</b> . Strategic Policy <b>SP1 Sustainable Development and Climate Change</b> also

	design, layout and landscaping.		Inclusion by Design (all published by the Design Council) <b>DfC HED</b> - Reference is made to 'Dwellings in the Mournes: A Design Guide' which may provide valuable information for the LDP's evidence base. <b>RSPB</b> – Within the POP there is currently no evidence on how the LDP proposes to utilise urban design to mitigate and adapt to climate change.	incorporates design requirements.
<b>PCP3: Sustainable Forms of Development</b> A principle rather than a policy, it reiterates PPS7 in promoting the reuse of brownfield land and the recycling of buildings.	3.1 – 3.9 of the SPPS outlines how sustainable development is at the heart of the SPPS and the Planning System.	Promotes sustainability through the Plan Vision & Objectives.	<b>RSPB</b> - welcomes reference to sustainable development however consider that it does not go far enough in meeting the Council's legislative requirement of furthering sustainable development.	Achieving sustainable development is at the core of the Plan Strategy. The Plan Strategy has brought forward Strategic Policy <b>SP1 Sustainable Development and Climate Change</b> .
<b>PCP4: Balanced Communities</b> A principle rather than a policy but relates to Policies HS2-HS4.  Promotes the provision of social housing within larger developments,	6.137 of the SPPS highlights that the provision of good quality housing offering a variety of house types, sizes and tenures to meet different needs, and development that provides opportunities for the community to share in local employment, shopping,	Key Issue 6 – Social Housing Need Key Issue 8 – Future Proofing and Housing for All	<b>DfI</b> - The Department welcomes policy approaches that support the SPPS objective of good quality housing that supports the creation of balanced communities and offers a variety of house types and tenures.	The principle of balanced communities will be delivered through the following operational policies: <b>HOU5 Affordable Housing (in settlements);</b> <b>COU3 Affordable Housing in the Countryside;</b>



travellers accommodation where there is an identified need and a range of house types and sizes as a means of achieving balanced communities.	leisure and social facilities, is fundamental to the building of more balanced communities.		<p><b>NIHE</b> would welcome a policy for supported housing which would promote both self-contained and shared accommodation. As supported housing need is not projected on a long-term basis NIHE recommend that a development management policy in respect of supported housing is included within the LDP which provides flexibility and prioritisation for such schemes</p> <p><b>NIHE</b> would welcome the replication of the Travellers policy within SPPS.</p>	<p><b>HOU6 Housing Type, Size and Tenure;</b>  <b>HOU7 Adaptable and Accessible Homes;</b>  <b>HOU8 Specialist Residential Accommodation;</b> and  <b>HOU9 Accommodation for the Travelling Community;</b></p>
<p><b>HS1: Living Over the Shop</b>  Promotes the sustainable reuse of existing buildings in order to provide residential use above shops and other businesses. Proposals are subject to the provision of a suitable</p>	6.137 of the SPPS states that residential use above shops and other business should be facilitated where appropriate.	PROPP – Carry forward Policy HS1 taking account of the provisions of the SPPS.	No comments received to this policy.	<p><b>Policy HS1</b> has been included within <b>Policy HOU4: Conversion or Change of Use to Flats or Apartments</b> (see above).</p>

living environment, adequate refuse storage space and acceptable design and materials.				
<p><b>HS2: Social Housing</b>  Outlines that social housing should be provided as an integral element of new residential development. This should be delivered through the provision of a mix of house types and size to promote choice and assist in meeting community needs in locations where a need has been established by the NIHE.</p>	<p>6.143 of the SPPS states that the development plan process will be the primary vehicle to facilitate any identified social/affordable housing need by zoning land or through key site requirements.</p>	<p>Key Issue 6 – Social Housing Need  The preferred approach was to set out a strategic policy requiring all housing sites over a certain threshold to provide a proportion of social housing.</p> <p>In addition zone sites for social housing (not large scale) and facilitate social housing as a proportion of larger housing schemes through key site requirements.</p>	<p><b>NIHE</b> would like the text and options to state 'affordable housing' rather than 'social housing'  <b>NIHE</b> would welcome an affordable housing policy which promotes affordable housing in mixed tenure developments as this can assist in the elimination of social exclusion, area based deprivation and poverty.  Policy should be written in such a way to prevent sites being artificially divided to avoid providing an element of affordable housing.  Policy must also ensure that any subsequent phases should contain the affordable housing numbers calculated based on the whole site and that the provision would not be concentrated in one area.</p>	<p><b>HOU5: Affordable Housing</b>  See Plan Strategy document. New policy wording is brought forward, tailored to meet the affordable housing needs of the district.</p> <p>Planning permission will only be granted for residential development proposals subject to the following criteria:  a) Within Newry City and the district's towns, on sites of 0.5ha or comprising of 10 units or more, provision should be made for a minimum of 20% affordable housing; or  b) Within the district's villages and small settlements, on sites of 0.2ha or comprising of 5 residential units or more, provision should be made for a minimum 20% affordable housing.</p> <p>By exception, proposals for affordable housing may be permitted on land identified as Open Space in accordance with</p>

			<p>Following a review of the high number of committed housing sites the HE have suggested that the threshold for sites which must provide a level of social/affordable housing should be lowered from the originally suggested 50 units. This approach would help deliver mixed tenure developments and ensure that windfall developments would also be required to contribute to meeting affordable housing need.</p> <p><b>DfI Strategic Planning</b> Consideration should be given to exploring with NIHE whether a projection of social housing need can be provided over a longer period to align with the lifetime of the plan.</p>	<p>Policy OS1 where it can be demonstrated that all of the following criteria are met:</p> <ul style="list-style-type: none"> <li>i. A need has been identified by the NIHE;</li> <li>ii. The application is made by a registered Housing Association or the NIHE; and</li> <li>iii. The proposal will bring substantial community benefits that decisively outweigh the loss of the open space.</li> </ul>
<b>HS3: Travellers Accommodation (as amended)</b>	6.144 of the SPPS largely reflects Policy HS3 and states where the HNA/HMA identifies a demonstrable	Not raised as key issue in POP.	<b>NIHE</b> would welcome the replication of the Travellers policy within SPPS.	<b>HOU9 Accommodation for the Travelling Community.</b> This policy provides for the assessment of future proposals

Provides criteria for the assessment of Travellers Accommodation through either a grouped housing scheme, a serviced site or a transit site.	need for Travellers specific accommodation, planning permission will be granted for a suitable facility to meet this need. This may be provided through a grouped housing scheme, a serviced site or a transit site, subject to meeting the same criteria set out in HS3.	PROPP – Carry forward Policy HS3 taking account of the provisions of the SPPS.		for the provision of suitable facilities if a need is identified.
<b>HS4: House Types and Size</b> This policy compliments PPS7 and requires that new residential development over 25 units/on sites 1 hectares or above should deliver a mix of house types and sizes to promote balanced communities and create variety and interest.	6.137 of the SPPS addresses balanced communities and highlights that the provision of good quality housing offering a variety of house types, sizes and tenures to meet different needs, and development that provides opportunities for the community to share in local employment, shopping, leisure and social facilities, is fundamental to the building of more balanced communities.	Key Issue 8 – Future Proofing and Housing for All  PROPP – Carry forward Policy HS3 taking account of the provisions of the SPPS.	<b>DfI Strategic Planning</b> The Department welcomes policy approaches that support the SPPS objective of good quality housing that supports the creation of balanced communities and offers a variety of house types and tenures.  <b>NIHE</b> - would like to see an option that requires all new housing developed to Lifetime Home standards In addition they would like to see 5% of new private sector housing developed to wheelchair standards which is especially important in the context of an aging population.	<b>HOU6: Housing Type, Size and Tenure</b> Planning permission will be granted for new residential development of 25 or more units, or on sites of one or more hectare where a mix of house types and sizes are provided. In smaller schemes the need to provide greater variety in type and size will be considered on its merits. The required mix of house types and sizes will be negotiated with developers, taking account of the specific characteristics of the development, the site and its context and the nature of the local housing need. In locations where apartment development of 25 or more units is considered acceptable, variety in the size of the units will be required.

				<p><b>HOU7: Adaptable and Accessible Homes</b></p> <p>Planning permission will be granted for development proposals which include a range of dwellings houses which are flexible, adaptable and accessible in order to be responsive to a lifetime of need. Due consideration should be given to dwelling type, internal room layout and overall plot size to ensure that units are adaptable to as wide a range of people as possible, or capable of future adaptation.</p> <p>The design of dwellings should ensure that they are capable of providing accommodation that is wheelchair accessible for those in society who are mobility impaired and be in accordance with space standards for wheelchair housing set out in Annex A of the Supplementary Planning Guidance.</p> <p>Additionally, where a wheelchair accessible dwelling, designed in accordance with the wheelchair space standards, has car parking within its individual plot boundary, at least one parking</p>
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				<p>space should be capable of enlargement to achieve a minimum width of 3300mm. Where communal parking is proposed at least two out of every 20 spaces should have a width of at least 3300mm (in accordance with Lifetime Home Standards (LHS).</p> <p>Applicants must state within their application that they have complied with the above criteria and demonstrate how the criteria have been met.</p>
<b>Planning Policy Statement 21: Sustainable Development in the Countryside</b>				
<p><b>CTY1: Development in the Countryside</b></p> <p>A directional policy that signposts the types of development which are considered acceptable in principle in the countryside.</p>	<p>The SPPS does not have an overarching policy like Policy CTY1 but does have other regional strategic policies that largely align with those policies within PPS21. SPPS omits any reference to Dispersed Rural Communities, these are specifically referred to in Policy CTY1.</p>	<p>PROPP – Carry forward Policy HS1 taking account of the provisions of the SPPS.</p>		<p>Countryside Strategy <b>CS1 Development in the Countryside</b> sets out the types of development which are considered acceptable in principle in the countryside.</p>
<p><b>CTY2: Development in Dispersed Rural Communities</b></p> <p>Sets out circumstances where development will be permitted in designated DRCs. Allows</p>	<p>There is no provision for DRCs in the SPPS.</p>	<p>PROPP – It is not proposed to carry forward Policy CTY2 as there are no Dispersed Rural Communities</p>	<p>Only 1 respondent referenced this - O'Callaghan Planning</p> <p>Provision should be made for Dispersed Rural Communities</p>	<p><b>Policy CTY2</b> has not been brought forward as there are no Dispersed Rural Communities identified in the district and none are proposed.</p>

for small cluster or clachan style development of up to 6 houses at a focal point in a DRC.		identified in the district.		
<b>CTY2a: New Dwellings in Existing Clusters</b> Provides opportunities for a new dwelling in an existing rural cluster provided the cluster is outside of a farm and consists of 4 or more buildings, 3 of which must be dwellings. The cluster must appear as a visual entity in the landscape and must be associated with a focal point e.g. community building or is located at a cross roads.	6.73 bullet point one of the SPPS states provision should be made for a dwelling at an existing cluster of development which lies outside a farm provided it appears as a visual entity in the landscape; and is associated with a focal point; and the development can be absorbed into the existing cluster through rounding off and consolidation and will not significantly alter its existing character, or visually intrude into the open countryside.	PROPP – Carry forward Policy CTY2a taking account of the provisions of the SPPS.  Consideration will be given to providing clarification on what is considered to be a focal point.	No comments received.	<b>COU1: Dwellings in Existing Clusters</b>  Policy wording has largely been carried forward. Additional clarification added to policy to indicate must be a cohesive grouping of buildings of permanent construction. The cluster appears as a visual entity in the landscape.  J&A text added.  Planning permission will be granted for a dwelling at an existing cluster of development provided all of the following criteria are met: <ul style="list-style-type: none"> <li>• The cluster of development lies outside of a farm and consists of a cohesive grouping of four or more buildings of permanent construction (excluding ancillary buildings such as garages, outbuildings and open sided</li> </ul>

				<p>structures) of which at least three are dwellings;</p> <ul style="list-style-type: none"> <li>• The cluster appears as a visual entity in the local landscape;</li> <li>• The cluster is visually associated with an established focal point (such as social/ community building/ facility), or is located at a public road junction;</li> <li>• The identified site provides a suitable degree of enclosure and is directly bound by other development in the cluster on at least two sides; and</li> <li>• Development of the site can be absorbed into the existing cluster through rounding off and consolidation and will not significantly alter its existing character and should integrate visually into the open countryside.</li> </ul>
<p><b>CTY3: Replacement Dwellings</b></p> <p>Provides policy for the provision of replacement dwellings where the dwelling to be replaced exhibits the essential characteristics of a dwelling and all external</p>	<p>6.73 bullet point two of the SPPS states that the building to be replaced should exhibit the essential characteristics of a dwelling and, as a minimum all external structural walls are substantially intact. Replacement dwellings are</p>	<p>PROPP – Carry forward Policy CTY3 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing clarification on what</p>	<p><b>DfC HED</b> believe there is an opportunity for the LDP to recreate stronger policy tests with regard to replacement dwellings, enabling opportunities for non-designated heritage assets to be enhanced or preserved and/or</p>	<p><b>COU2: Replacement Dwellings</b></p> <p>Policy wording has largely been carried forward. Additional clarification added to policy indicating that the dwelling must be of permanent construction.</p>



<p>structural walls are substantially intact. Agricultural buildings or buildings of a temporary construction will not be eligible for replacement. Outlines when a non-residential building can be replaced with a dwelling and deals with replacement of fire damaged dwellings. Seeks to retain non-listed vernacular dwellings and promote their sympathetic renovation and continued use rather than replacement. Sets out criteria that all replacement dwellings must meet including siting, visual impact, high quality design, provision of services and safe access.</p>	<p>also required to be located within the curtilage of the original dwelling where practicable, or at an alternative position nearby where there are demonstrable benefits in doing so. Replacement dwellings must not have a visual impact significantly greater than the existing building. In cases where the original building is retained, it will not be eligible for replacement again. Planning permission will not be granted for the replacement of a listed dwelling unless there are exceptional circumstances;</p>	<p>constitutes a replacement dwelling.</p>	<p>consideration of the safeguarding of non-designated heritage assets - this may include requiring stronger evidence to indicate a structure is structurally unsound or removal or the economic test. Heritage assets in the countryside can make an important contribution to rural housing through sustainable re-use rather than replacement. HED believe there is the opportunity for council to create stronger policy tests with regards to replacement dwellings and enhancing and protecting non-designated heritage assets</p>	<p>J&amp;A expanded on to provide greater clarity on the meaning of 'essential characteristics', the retention of landscape features and retention of rural character.</p> <p>Reference to supplementary planning guidance added.</p> <p>See Plan Strategy document for full wording.</p>
<p><b>CTY4: The Conversion and Reuse of Existing Buildings</b> Provides for the conversion of a suitable building to a variety of uses, including as a single dwelling.</p>	<p>Within 6.73 the SPPS separates the policy into one for residential use and another for non-residential use. The policy text in the SPPS has been revised and refers to a locally important building</p>	<p>Key Issue 21: Non-Designated Heritage Assets PROPP – Carry forward Policy CTY3 taking account of the provisions of the SPPS.</p>	<p><b>DfC HED</b> While HED acknowledge the council's evaluation process they consider that the adoption of creating a list of non-designated heritage assets as the preferred option.</p>	<p>CTY4 is addressed under HE14: The re-use of Non-Listed Vernacular and Locally Important Buildings.</p>

Proposals have to be of high design quality and meet certain criteria, this includes the building being of permanent construction, proposals maintaining or enhancing the building, no affect on amenity of nearby residents, non-residential use should be appropriate to the countryside location and all proposals should provide necessary services and safe access.	rather than a suitable building as stated in CTY4. The SPPS makes it clear that in cases where the former dwelling is retained as an ancillary building to the new dwelling it will not be eligible for conversion back to a dwelling. The SPPS does not provide detailed criteria and simply states that conversions to residential use should be appropriate in nature and scale to its countryside location.	Consideration will be given to providing additional clarification to policy where appropriate.	HED advise council to consider reviewing the publication 'Building on Tradition: A Sense of Loss Survival of Rural Traditional Buildings in NI'  <b>National Trust</b> The plan should set out a policy to promote and encourage the conversion of redundant vernacular buildings into residential use.  <b>Mourne Heritage Trust</b> Little evidence that the SPPS and other policies have been successful in the retention and re-use of vernacular buildings.	
<b>CTY5: Social and Affordable Housing</b>  Allows for registered Housing Associations to development of up to 14 dwellings subject to specific social/affordable housing need being demonstrated by the NIHE which cannot be	6.73 of the SPPS is not as prescriptive as Policy CTY5 and refers to development of a small group where the number will depend upon the identified need and the ability to integrate with its surroundings rather than 'no more than 14 dwellings.'  Unlike CTY5 it does not state that applications must be	PROPP – Carry forward Policy CTY5 taking account of the provisions of the SPPS.  Consideration will be given to providing a definition of what constitutes a small group of dwellings that will be	<b>NIHE</b> would like the text and options to state 'affordable housing' rather than 'social housing' NIHE would welcome an affordable housing policy which promotes affordable housing in mixed tenure developments as this can assist in the elimination of social exclusion, area	<b>COU3: Affordable Housing in the Countryside</b>  Existing policy wording carried forward and enhanced to allow for up to 20 dwellings in the case of a village and 14 in the case of a small settlement. Greater scope for other suitable providers to make an application such as community led housing organisations or other not for

<p>met within an existing settlement.</p> <p>Proposals have to be adjacent or near to a small settlement and a sequential test is applied in terms of location. Proposals must be sited and designed to integrate with their surroundings and meet other planning criteria and policy.</p> <p>Criteria relating to Dispersed Rural Communities is also provided.</p> <p>The policy states that only one group will generally be permitted in close proximity to any particular settlement.</p>	<p>made by registered Housing Associations, nor does it set out a sequential test in terms of locating a suitable site.</p> <p>The SPPS also does not limit such proposals to only one group in close proximity to any particular rural settlement.</p>	<p>permitted and whether more than one housing group should be permitted.</p>	<p>based deprivation and poverty.</p> <p>Policy should be written in such a way to prevent sites being artificially divided to avoid providing an element of affordable housing.</p> <p>Policy must also ensure that any subsequent phases should contain the affordable housing numbers calculated based on the whole site and that the provision would not be concentrated in one area.</p>	<p>profit providers subject to NIHE support.</p> <p>Reference to Dispersed Rural Communities removed.</p> <p>Planning permission may be granted for a group of dwellings adjacent to or near a village or small settlement to provide affordable housing to meet the needs of the rural community. Planning Permission will only be granted provided all the following criteria are met:</p> <ul style="list-style-type: none"> <li>• A need has been identified by the Northern Ireland Housing Executive (NIHE) or the relevant housing authority which cannot readily be met within an existing settlement in the locality;</li> <li>• If the nearest settlement is a village a group up to maximum of 20 dwellings, or if the nearest settlement is a small settlement a group up to a maximum of 14 dwellings may be allowed;</li> <li>• Applications are made by a; Registered Housing Association; Community led housing organisation supported by the</li> </ul>
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				<p>NIHE, or; Other suitable not-for-profit housing provider, partnership or initiative supported by the NIHE.</p> <p>In assessing the acceptability of sites outside a settlement, the following sequential test in terms of location will be applied:</p> <p>(a) Land adjacent to the existing settlement limit, subject to amenity and environmental considerations;</p> <p>(b) A site close to the settlement limits which currently contains buildings or where the site is already in a degraded or derelict state and there is an opportunity to improve the environment;</p> <p>(c) An undeveloped site in close proximity to the settlement where the development could be visually integrated into the landscape.</p> <p>Subject to the above sequential test, generally only one group will be permitted adjacent to or near a village or small settlement. Exceptionally, consideration will be given to more than one group of dwellings provided the combined total number of dwellings is no</p>
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				greater than the permitted maximum allowed under this policy adjacent to or near the village or small settlement (20 units or 14 units respectively).
<p><b>CTY6: Personal and Domestic Circumstances</b></p> <p>This policy permits dwellings in the countryside for those who have special or personal domestic circumstances.</p> <p>Includes criteria which requires the applicant to demonstrate compelling and site specific reasons as to why they need a dwelling in a particular rural location.</p>	<p>6.73 of the SPPS is not as prescriptive as Policy CTY6. Whilst it still requires the applicant to demonstrate compelling and site specific reasons for a dwelling as well as demonstrating there are no alternative solutions, it does not refer to the level/type of detail required.</p>	<p>PROPP – Carry forward Policy CTY6 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>	<p>No comments received.</p>	<p><b>COU4: Personal and Domestic Circumstances in the countryside</b></p> <p>Existing policy wording has largely been carried forward. Amended to reflect the SPPS wording referencing individual needs rather than the applicant. Clarification provided indicating where the need for care is short term the use of temporary accommodation will be favoured.</p> <p>Planning permission will be granted for a dwelling in the countryside to meet the long-term needs of a person where there are compelling, and site specific reasons for this related to the person's personal or domestic circumstances and provided the following criteria are met:</p> <ul style="list-style-type: none"> <li>• The person can provide satisfactory evidence that a new dwelling is a necessary response to the particular circumstances</li> </ul>

				<p>of the case and that genuine hardship would be caused if planning permission were refused; and</p> <ul style="list-style-type: none"> <li>• There are no alternative solutions to meet the particular circumstances of the case, such as: an extension or annex attached to the existing dwelling; the conversion or reuse of another building within the curtilage of the property; or the use of a temporary mobile home for a limited period to deal with the immediate short term circumstances.</li> </ul> <p>All permissions granted under this policy will be subject to a condition restricting the occupation of the dwelling to a named individual and their dependents.</p>
<p><b>CTY7: Dwellings for Non-Agricultural Business Enterprises</b></p> <p>This policy provides opportunity for an established non-agricultural business in the countryside to secure</p>	<p>6.73 of the SPPS is not as prescriptive as Policy CTY7. The SPPS does not include criteria relating to siting or integration and does not refer to approvals being subject to an occupancy condition.</p>	<p>PROPP – Carry forward Policy CTY7 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing additional</p>	<p>No comments received.</p>	<p><b>COU5: Dwellings for Non-Agricultural Business Enterprises</b></p> <p>Existing policy wording largely brought forward Amended to reflect the SPPS wording in respect of a site specific need existing.</p>

<p>permission for a dwelling in circumstances where one of the firm's employees must live on site.</p> <p>Site specific need for a dwelling must be demonstrated and if the business has been operating successfully without a dwelling the need for accommodation must be justified.</p> <p>The dwelling should be located</p>		<p>clarification to policy where appropriate.</p>		<p>Planning permission will be granted for a dwelling house in connection with an established non-agricultural business enterprise where it can be clearly demonstrated that a site specific need exists that makes it essential for an employee of the business to live at the site of their work.</p> <p>Where such a need is accepted the dwelling will need to be located beside, or within, the boundaries of the business enterprise and integrate with the buildings on the site.</p> <p>Planning permission granted under this policy will be subject to a condition restricting occupation of the dwelling for the use of the business.</p>
<p><b>CTY8: Ribbon Development</b></p> <p>The policy resists ribbon development in the countryside but allows for the development of a small gap site, sufficient only to accommodate up to a maximum of two dwellings within a substantial and continuously built up</p>	<p>6.73 of the SPPS is similar but less detailed than Policy CTY7. This states that councils may bring forward policies in respect of the development of a small gap site within an otherwise substantial and continuously built up frontage.</p> <p>The SPPS does not define the size of an acceptable gap,</p>	<p>PROPP – Carry forward Policy CTY8 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to defining the size of a gap site as well as what constitutes a built up frontage.</p>	<p>See post POP consideration under paragraph 8.22-8.24 above.</p>	<p><b>COU6: Ribbon Development</b></p> <p>Existing policy wording largely brought forward, clarification provided to state what constitutes 'a substantial and continuously built up frontage.'</p> <p>J&amp;A enhanced with fuller explanation of frontage and the buildings that make up a</p>

frontage and provided this respects existing development patterns. Substantial and continuously built up frontage is defined as a line of three or more buildings along a road frontage (including footpaths or private lanes) without accompanying development to the rear. In relation to economic development provision is also made for infilling a small gap with an appropriate economic development proposal. Such a proposal must be four criteria.	<p>nor provide a definition of a substantial and continuously built up frontage unlike CTY8.</p> <p>The SPPS does not have provision for the infilling of a gap site with an economic development proposal.</p>			<p>substantial and continuously built-up frontage.</p> <p>Planning permission will be refused for a building which will:</p> <p>a) Create a ribbon of development or:</p> <p>b) Adds to an existing ribbon of development.</p> <p>An exception will be permitted for the infilling of a small gap site, sufficient only to accommodate up to a maximum of two dwellings, within an otherwise substantial and continuously built-up frontage and provided this respects the existing development pattern along the frontage in terms of size, scale, siting, plot size and plot width.</p> <p>For the purposes of this policy a substantial and continuously built-up frontage is a line of three or more visually linked buildings of permanent construction (of which at least two are dwellings) along a road frontage.</p>
<b>CTY9: Residential Caravans and Mobile Homes</b>	6.73 of the SPPS uses similar wording to Policy CTY9. It sets out the same two	PROPP – Carry forward Policy CTY9 taking account of		COU7: Residential Caravans and Mobile Homes



<p>The policy sets out two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside: when it is for the provision of temporary accommodation pending development of a permanent dwelling or there are compelling and site specific reasons related to personal or domestic circumstances.</p>	<p>circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside.</p> <p>The SPPS does not specify that permissions will be subject to a 3-year time limit.</p>	<p>the provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>		<p>Existing policy wording brought forward.</p> <p>Planning permission may be granted for a residential caravan or mobile home, for a temporary period only, in exceptional circumstances.</p> <p>These exceptional circumstances include:</p> <ul style="list-style-type: none"> <li>• Pending the development of a permanent dwelling; or</li> <li>• Where there are compelling and site-specific reasons related to personal or domestic circumstances (see Policy COU4 Personal and Domestic Circumstances).</li> </ul> <p>All permissions will normally be subject to conditions imposing a three-year time limit. However, this may be extended having regard to the particular circumstances of the case.</p> <p>The siting of a residential caravan or mobile home will be subject to the same planning and environmental considerations as a permanent dwelling. Permission will depend on the ability to integrate the unit within an existing building</p>
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				group and screen the unit from public view. Residential caravans or mobile homes on farms will be required to be visually linked or sited to cluster with an established group of buildings on the farm.
<p><b>CTY10: Dwellings on Farms</b></p> <p>The policy sets out three criteria that must be met for dwelling on a farm: the farm business must be currently active and established for at least six years; no dwellings or development opportunities should have been sold off from the holding in the previous 10 years and the new building should visually link/cluster with a group of buildings on the farm.</p> <p>Provision is included for siting elsewhere on the farm in two cases, either for health and safety reasons or if there are verifiable plans to expand the farm</p>	<p>6.73 of the SPPS reflects the thrust of Policy CTY10 and includes the three criteria that must be met.</p> <p>The requirement to visually link or site the dwelling to cluster with an existing group of buildings is included however the SPPS does not provide the option of an alternative site away from the from buildings.</p> <p>The SPPS is silent on the assessment of a dwelling for those involved in keeping horses for commercial purposes.</p>	<p>PROPP – Carry forward Policy CTY10 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>	<p>See post POP consideration under paragraph 8.25-8.27</p>	<p>COU8: Dwellings on Farms</p> <p>Existing policy wording largely brought forward and amended to reflect the SPPS wording. Clarification that policy will accommodate those engaged in farm business and other rural dwellers. No development opportunities have been transferred. A proposal for keeping and breeding of horses for commercial purposes will not be assessed under this policy but under policy COU5.</p> <p>J&amp;A expanded on to provide clarification on an active and established farm and development opportunities being sold off or transferred.</p> <p>Planning permission will be granted for a dwelling house on a farm to accommodate those engaged in the farm business or</p>

<p>business at the existing building group. A dwelling under this policy will only be acceptable once every 10 years. This policy is also used to assess proposals for a dwelling by those involved in the keeping and breeding horses.</p>				<p>other rural dwellers where all of the following criteria can be met:</p> <p>(a) The farm business is currently active and has been established for a minimum of 6 years;</p> <p>(b) No dwellings or development opportunities out-with settlement limits have been sold off, or transferred from, the farm holding within 10 years of the date of the application; and</p> <p>(c) The proposed dwelling is visually linked or sited to cluster with an established group of buildings on the farm holding, and where practicable, access to the dwelling should be obtained from an existing lane.</p> <p>Exceptionally, consideration may be given to an alternative site elsewhere on the farm, provided there are no other sites available at another group of buildings on the farm and where there are either:</p> <ul style="list-style-type: none"> <li>• Demonstrable health and safety reasons; or</li> <li>• Verifiable plans to expand the farm business at an existing building group on the farm.</li> </ul>
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				<p>Planning permission granted under this policy will only be acceptable once every 10 years. A proposal for a dwelling by those involved in the keeping or breeding of horses for commercial purposes will be assessed under Policy COU5 Dwellings for Non-Agricultural Business Enterprises.</p>
<p><b>CTY13: Integration and Design of Buildings in the Countryside</b></p> <p>This policy seeks to ensure that all buildings in the countryside are visually integrated and are of an appropriate design.</p> <p>It sets out seven circumstances when a new building will be unacceptable: when it is prominent; lacks natural boundaries; relies on new landscaping; ancillary works do not integrate; design is inappropriate; fails to blend with the landform or where the proposal is</p>	<p>6.70 of the SPPS is less detailed than Policy CTY13 and states that development in the countryside must integrate into its setting, respect rural character and be appropriately designed.</p>	<p>PROPP – Carry forward Policy CTY13 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>		<p><b>COU9: Design and Integration of Buildings in the Countryside</b></p> <p>All development in the countryside must be sited and appropriately designed to integrate sympathetically with their surroundings. A new building will be unacceptable where:</p> <ul style="list-style-type: none"> <li>a) It is a prominent feature in the landscape when viewed from critical viewpoints along public roads, paths or shared private laneways; or</li> <li>b) The site lacks long established natural boundaries or is unable to provide a suitable degree of enclosure for the building to integrate into the landscape; or</li> </ul>

for a dwelling o a farm it is not visually linked or cluster with an established group of buildings.				<p>c) It relies primarily on the use of new landscaping for integration; or</p> <p>d) Ancillary works do not integrate with their surroundings; or</p> <p>e) The design of the building is inappropriate for the site and its locality; or</p> <p>f) It fails to blend with the landform, existing trees, buildings, slopes and other natural features which provide a backdrop; or</p> <p>g) In the case of a proposed dwelling on a farm (see Policy COU8) it is not visually linked or sited to cluster with an established group of buildings on the farm.</p> <p>All proposals for buildings in the countryside must be accompanied by a statement setting out how they have taken account of the Department's Publication – 'Building on Tradition', and how they respect any distinctive local traditions for design and siting.</p>
<b>CTY14: Rural Character</b> This policy seeks to ensure all buildings do	6.70 of the SPPS is less detailed than Policy CTY13 and states that development in the countryside must	PROPP – Carry forward Policy CTY13 taking account of the		<b>COU10: Rural Character</b> All development in the countryside must not have an

<p>not result in a detrimental change to or further erode rural character.</p> <p>The policy sets out five circumstances when a new building will be unacceptable: where it be unduly prominent; would result in a suburban style build-up; does not respect traditional settlement patterns; would create or add to a ribbon of development or ancillary works would damage rural character.</p>	<p>integrate into its setting, respect rural character and be appropriately designed.</p>	<p>provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>		<p>adverse impact on the rural character of the area. A new building will be unacceptable where:</p> <p>a) It is unduly prominent in the landscape; or</p> <p>b) It results in a suburban style build-up of development when viewed with existing and approved buildings; or</p> <p>c) It does not respect the traditional pattern of settlement exhibited in that area; or</p> <p>d )It creates or adds to a ribbon of development (see Policy COU6); or</p> <p>e)The impact of ancillary works (with the exception of necessary visibility splays) would damage rural character.</p>
<p><b>CTY15: The Setting of Settlements</b></p> <p>The policy states that planning permission will be refused for development that mars the distinction between a settlement and the surrounding countryside or that otherwise results in urban sprawl.</p>	<p>6.71 of the SPPS uses similar wording to Policy CTY15 in that development in the countryside must not mar the distinction between a settlement and the surrounding countryside, or result in urban sprawl.</p>	<p>PROPP – Carry forward Policy CTY13 taking account of the provisions of the SPPS.</p> <p>Consideration will be given to providing additional clarification to policy where appropriate.</p>		<p>COU11: Setting of Settlements</p> <p>Planning permission will be refused for development that mars the distinction between a settlement and the surrounding countryside or that otherwise results in urban sprawl.</p>

## **Appendices**

Appendix A Urban Capacity Study

Appendix B Lichfields Housing Need and Supply Review

Appendix C NIHE Housing Investment Plan 2023-2026

Appendix D NIHE Housing Investment Plan Update 2024

Appendix E NIHE Strategic Housing Market Area - NI Summary

Appendix F NIHE Strategic Housing Market Area – South Eastern Report

Appendix G NIHE Strategic Housing Market Area – Belfast Report

Note: All the above appendices are separate documents and can be viewed on the draft Plan Strategy evidence base section of the Council website.

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