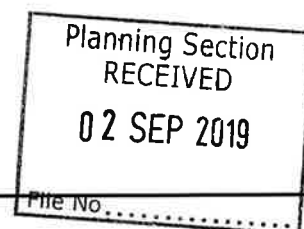


Antrim and Newtownabbey Borough Council,
Forward Planning Team,
Mossley Mill,
Carnmoney Road North,
Newtownabbey,
BT36 5QA



2nd September 2019

Dear Sharon,

The Housing Executive welcomes the publication of Antrim and Newtownabbey Borough Council's Local Development Plan (LDP) draft Plan Strategy (dPS). We believe that the publication of development plans provides opportunities to promote sustainable development, sustainable communities and place making.

The Housing Executive supports the aims and principles set out in the Regional Development Strategy (RDS), the Strategic Planning Policy Statement for Northern Ireland (SPPS) and the Sustainable Development Strategy. We are also committed to sustainable development and the creation of sustainable communities. These policy documents and their principles have informed our response to the dPS.

We believe the three pillars of sustainable development, the economy, social considerations and the environment are interlinked and support each other, and therefore, we support a balanced approach between the three elements, within the LDP.

We support the LDP Vision, Strategic Objectives and many of the policies contained within the dPS, in particular we welcome within policy that developer contributions may be required and that these can deliver affordable housing. Developer contributions for affordable housing would enable government to deliver housing to address unmet housing need, help to achieve balanced communities through mixed tenure housing, and would reduce the need for housing association grant. This reduction in grant would support a larger programme of new build development, thereby further helping to address housing need within the Borough. The Housing Executive would welcome an opportunity to meet with the Council to discuss this developer contribution policy for affordable housing and how it can be implemented.

Housing is central to our lives. When it is affordable, secure and in good condition, it provides a foundation for us to participate fully in and contribute to society. We believe that the dPS has a crucial role to support the delivery of affordable and high quality housing to

meet community need. However, we consider that some changes to housing policies are needed to fully realise the opportunity the LDP can make in providing this vital infrastructure, which influences people's quality of life, health and well-being, and to ensure that sustainable development is delivered.

However, the Housing Executive believes the proposed affordable housing policy is limited, estimated to provide only 13 units a year, leading to a shortfall in excess of 1,000 units to meet affordable housing need in the Council area over the next 15 years. Therefore, we believe that our Housing Needs Assessment was not given due weight in the housing allocation, as required by regional planning policy. As the evidence within the HNA does not seem to have informed the affordable housing policies, we would like further information on how this policy has been devised, and the evidence base to support it.

We would also like to see a policy, which requires the introduction of Lifetime Homes across all new developments, as opposed to only a proportion. Lifetime Homes support the changing needs of individuals and families at different stages of life, through the incorporation of 16 design criteria that can be universally applied to new homes at minimal cost.

While we have included objections within our representation, we would welcome further discussion with the Council to explain our concerns. We would also like to attend the Independent Examination to provide evidence and to present our position.

Please see our detailed consideration of the dPS policies, enclosed.

I trust this information is of assistance,

Yours faithfully,

Clark Bailie
Chief Executive

Housing Executive Response to Antrim and Newtownabbey Local Development Plan Draft Plan Strategy

Policy	Paragraph / Page	Representation / Support / Objection	Comments
1. Introduction			
Introduction	1.1 – 1.17	Representation	<p>The Housing Executive would like to see further information included in this section on how prematurity would be applied. The application of prematurity is supported by the Strategic Planning Policy Statement (SPPS), and the Joint Ministerial Statement (JMS) “Development Plans and Implementation of the Regional Development Strategy”. We believe the JMS remains a material consideration in the determination of planning applications.</p> <p>Previous Development Plans applied prematurity post publication of draft Plans. While we understand that there is no presumption that a Local Development Plan (LDP) is sound (Development Plan Practice Note 6), the option to apply prematurity is still included within the SPPS. The SPPS states that where any LDP is under preparation or review, it may be justifiable to refuse planning permission on grounds of prematurity, where development proposals would, individually or cumulatively, prejudice the outcome of the plan process. In addition, the SPPS does not include a statement that the weight attached depends on the stage of plan preparation, increasing as successive stages are reached.</p> <p>We believe that the dPS could be a material consideration in the determination of planning applications in Antrim and Newtownabbey, as the extant plans are now out of date. These extant Plans include the Antrim Area Plan 1984-2001 and its alterations, the Belfast Urban Area Plan 2001, the Carrickfergus Area Plan 2001, the Draft Newtownabbey Area Plan 2005 and the Draft Belfast Metropolitan Area Plan 2015. All of these were prepared before the publication of the current Regional Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
2. Setting the Context			
Setting the Context	2.5	Representation	<p>The Housing Executive would like to see reference made to Lifetime Opportunities – Government’s Anti-Poverty and Social Inclusion Strategy for Northern Ireland, as the Development Plan Practice Note (DPPN) 1 states this is a central strategy that a Council must have regard to in the formulation of LDPs. The Lifetime Opportunities Strategy aims to eliminate poverty and social exclusion and states that policies and programmes should be tailored to specific needs and targeted to those in greatest objective need. We believe that mixed tenure development and an adequate supply of affordable and accessible housing, and consequent balanced communities, can have a key role in the elimination of poverty and social exclusion.</p>
	2.27 & 2.28	Support	<p>The ability for all to be housed in an adequate home is a necessary prerequisite to achieve the objectives of Antrim & Newtownabbey’s Community Plan, Love Living Here, including the goal “our vulnerable people are supported” and the four outcomes, “Our citizens enjoy good health and wellbeing”, “Our citizens live in connected, safe, clean and vibrant places”, “Our citizens benefit from economic prosperity” and “Our citizens achieve their full potential”.</p> <p>An adequate home is defined by the UN as having:</p> <ul style="list-style-type: none"> • security of tenure; • availability of services, materials, facilities and infrastructure; • affordability; • habitability; • accessibility; • location (close to employment opportunities and social facilities) and • cultural adequacy. <p>We believe that the housing policies within the LDP should aim to ensure that new residential developments provide adequate homes, as defined by the UN, for all in the</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
	2.41 - 2.45	Representation	Antrim and Newtownabbey Borough Council area. Reducing inequalities is of particular pertinence to Antrim and Newtownabbey Borough as the Northern Ireland Multiple Deprivation Measure (NIMDM) 2017 indicated that “there are considerable inequalities throughout our Borough and approximately 19% of our Borough’s residents suffer from a long-term health problem or disability....” The Community Plan has identified “that it is common for health inequalities to exist between more affluent areas and those with higher levels of deprivation”. We support the statement that the LDP has an important role in facilitating a reasonable mix and balance of housing tenures and types in the overall provision of housing. We believe that mixed tenure development and an adequate supply of affordable and accessible housing can help achieve sustainable, balanced communities and contribute to poverty elimination and a reduction in health inequalities, which help meet the objectives of the Council’s Community Plan.
3. Plan Vision & Strategic Objectives			
Plan Vision	3.2	Representation	We support the Plan Vision. In particular, we welcome the phrase “housing availability and connectivity that meets the needs of our community”. We would like to see this ambition realised through a more evidence-based affordable housing policy.
	3.9	Representation	We welcome the statement “The LDP will also seek to encourage the delivery of affordable housing opportunities to help meet local needs, and ensure a diverse choice of housing for an ageing and changing population”, however, this needs to be supported by planning policies which meet affordable housing need and which provide sufficient Lifetime Homes and wheelchair housing.
Strategic Objectives	Pages 58 & 59	Support	We generally support the Strategic Objectives. In particular we would make the following comments:

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> We support Strategic Objective 1, which refers to the promotion of sustainable growth. The Housing Executive considers that sustainable growth needs to be supported by robust social, economic and environmental policies in equal measure. We strongly support the objective “to meet the needs of all our citizens.” While we welcome Strategic Objective 8 and the aim to “provide a diverse choice of housing”, we would like this Strategic Objective to explicitly mention affordable housing within a mixed tenure environment.
4. Sustainable Development			
SP 1.1 – 1.4	Pages 62 & 63	Representation	<p>The Housing Executive supports an approach where proposals will be granted planning permission where they contribute to sustainable development. Therefore, we would like proposals assessed with reference to the positive and negative effects they will have on economic, environmental and social factors. We believe a place making approach can help to ensure that the holistic effects of development are adequately assessed.</p> <p>We also support the precautionary principle outlined in SP 1.3. A precautionary principle is important when evidence of environmental or human health hazards is uncertain. We understand that the policy on the precautionary principle aligns with the SPPS, by containing an exception if there are reasons of overriding public interest. However, as planners have a social responsibility to protect the public from exposures to harm; if a proposal may present a potential risk to health, it should not be termed as having an overriding public interest. In addition, we would like to see a requirement that any adverse effects are mitigated.</p> <p>Under Development Impacts SP 1.4, we would like to see the inclusion of Health Impact Assessments for major development. The Housing Executive also recognises the importance of considering health as part of the planning process and that health impacts are considered in policy formulation. Health Impact Assessments are often a</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
SP 1.6 – 1.12		Representation	<p>requirement for planning applications in GB and they can help meet the SPPS and Community Planning objective to improve health and wellbeing.</p> <p>The Housing Executive would like to see the Spatial Growth Strategy primarily based on the RDS Spatial Framework, rather than existing commitments. While existing commitments may influence employment or housing development, this should not be a principle factor, and there should be an allowance to redefine development potential and settlement limits, if planning permission lapses.</p> <p>We welcome the support given to proposals that re-use brownfield land in SP 1.11, however, we would also like the Spatial Growth Strategy to refer to the RDS target that 60% of housing land should be on brownfield sites within the urban footprint, which encourages compact urban forms and promotes more housing within existing urban areas.</p> <p>We support the strategic approach in SP 1.10 and SP 1.12 to development in the countryside. We strongly support the RDS aim of sustaining rural communities but believe housing allocation within the countryside should be focused primarily on settlements, rather than the open countryside where accessibility to services can be difficult. This will better promote an aim of the draft Programme for Government to reduce travel demand and travel times, through the integration of land use planning and transport.</p> <p>We strongly support the introduction of Developer Contributions, within the dPS, which means that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The Housing Executive strongly welcomes the inclusion of the provision of affordable housing as a matter that may require contributions from developers. Developer contributions for affordable housing</p>
SP 1.14 – 1.17	4.9 – 4.10	Support	

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<p>would enable government to deliver housing to match unmet housing need, help to achieve balanced communities through mixed tenure housing, and would reduce the need for housing association grant. This reduction in grant would support a larger programme of new build development, thereby further helping to address housing need within the District. The Housing Executive would welcome an opportunity to meet with the Council to discuss a further progressing a developer contribution policy for affordable housing and how this could be implemented.</p> <p>However, it should be noted that under the current affordable housing policy, there would be limited opportunities to achieve a contribution for affordable housing and the benefits this would bring, would be lost for the majority of housing schemes.</p> <p>In addition, we believe a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.</p>
5. Employment			
SP 2.1 – 2.11, DM 1.1 – 1.7	5.6 – 5.16, 5.26 – 5.28	Support	<p>The Housing Executive is generally supportive of the dPS's economic policies. The Housing Executive welcomes the policy focus on enterprise and employment growth within the main towns across the Borough. The Housing Executive supports barrier-free employment locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. We also would like to see a sequential approach used to identify employment land, which directs employment to the Hubs and local towns first. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft Programme of Government delivery plans.</p> <p>We believe that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities. The Housing</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			Executive supports the presumption against the alternative use of land and premises within Strategic Employment Locations and Local Employment Sites, which aligns with the RDS principle to maintain an adequate supply of employment land throughout the Plan period. If employment land is to be released for alternative uses it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the Borough.
DM 2	5.29 – 5.31	Support	In respect of economic development in the countryside, we support the sequential approach for the location of economic development sites with land within settlements being considered first before open countryside sites are investigated to protect rural character.
SP 2.12 – 2.14, DM 6 & DM 7	5.17 – 5.20, 5.39 – 5.45	Support	The Housing Executive supports the retail hierarchy and policies and the “town centre first” approach for service provision across the Borough to help ensure that town centres are vibrant, mixed-use areas, which reflects the SPPS. We also support increasing the supply of affordable homes through town centre living initiatives, including Key Site Requirements (KSRs) for affordable housing within development opportunity sites and vacant sites, and by promoting “Living Over the Shops” (LOTS). Town centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration. This will help promote accessible retail and services, an important element of sustainable communities. In particular, we welcome the reference to housing as an acceptable use in town centres as this can help promote the vitality and viability of centres. We would like to see planning permission granted for town centre living accommodation where there is adequate access, and facilities for essential services such as refuse and fuel storage. In addition, we would like to see flexibility in car parking standards for these schemes.
	Page 81		We strongly welcome the Positive Planning Note: Adding Value, which encourages the

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			<p>innovative use of social clauses within the LDP to deliver positive social benefits. We support the Council's intention to collaborate with developers of Major Planning Applications/other significant employment generating schemes and uses to secure employment opportunities/training and skills development for local unemployed/underemployed residents. The use of social clauses is often practiced in Great Britain to provide employment or training opportunities for young people or the long-term unemployed. We note that the Department of Finance, in conjunction with the Construction Industry Forum for Northern Ireland, has drawn up guidance and model contracts on sustainable construction. The aim of which is "to promote social inclusion and equal opportunities, including the progression of people who are long term unemployed and those leaving education and training, as a key way of delivering social elements of sustainable development".</p> <p>As we strongly welcome the use of social clauses to provide training and employment opportunities, we believe that this should be strengthened by being included as a development management policy. We note that the use of social clauses in Great Britain is often secured by conditioning planning permission to provide employment and training to local unemployed people.</p>
6. Transportation and Infrastructure			
SP 3, DM 12	6.1 – 6.18, 6.26 – 6.29	Support	<p>The Housing Executive welcomes the promotion of accessibility and the encouragement of a modal shift away from car use towards more sustainable and active transport choices, particularly as 20% of the Borough's residents have no access to a private car. We note that reducing travel demand through the integration of land-use planning and transport is a key objective of the draft Programme for Government delivery plans and we support the measures outlined in policy SP 3.5 to help achieve this. We believe that new developments should be concentrated in locations with good access to public transport, walking and cycling facilities. As well as contributing to the reduction of</p>

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			greenhouse gases and promoting active lifestyles which are key aims in the SPPS, a reduction in car use can lead to communities that are more cohesive. Research shows that as people travel without cars, they interact with neighbours and use local shops and facilities. Developments should be promoted which reduce car dominance in local streets, encourage pedestrian and cycle journeys, and make it safer for children to walk to school and play outside. Designing developments where pedestrians and cyclists are given priority will help support better health outcomes. See also policy DM 25 – Urban Design.
DM 10	6.23	Representation	<p>The Housing Executive agrees with the policy approach (SP 3.4) to protect disused transport routes and promote opportunities for their reuse for transport or recreational purposes. Policies which support active travel can improve health and wellbeing. Disused Transport Routes or Community Greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles, also opening up the countryside, attracting visitors and providing economic benefits. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated, to create a network of traffic-free routes.</p> <p>In relation to policy DM 10, we would like some flexibility in the application of parking standards in affordable housing schemes, due to lower car ownership levels for social housing, than other tenures of development, (56% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).</p>
7. Homes			
Strategic Objectives for Housing	7.3	Representation	As stated in our response to the Plan Vision and Strategic Objectives, the Housing Executive supports the Strategic Objectives that relate to housing, especially Objective 8, to ensure a sufficient supply of land for new homes, provide a diverse choice of housing

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SP 4.2 - 4.6	7.6 - 7.17	Representation	<p>and strengthen community cohesion. We believe that robust and evidence based development management policies are required to achieve this Objective. Therefore, we would like to see changes to the affordable housing policy and the inclusion of a requirement for all houses to be built to Lifetime Home standards, and a proportion of wheelchair standard housing, to provide housing choice to meet the needs of local people.</p> <p>The total allocation of Housing Growth for rural areas within the Borough is just 13.3%. The Rural Needs Act (NI) 2016 requires that councils have due regard to meeting the social and economic needs of people in rural areas and we consider that such a low proportion of housing growth in rural areas is unlikely to support the creation and maintenance of sustainable rural communities. The Housing Executive would like to see a higher proportion of growth allocated to rural settlements. We would also like to see a reduction in the proportion of housing growth allocated to the open countryside as development within settlements provides access to services and facilities and would help deliver sustainable rural communities. We would like to see flexibility within the LPP to allocate further housing growth to rural settlements, should housing need increase.</p>
SP 4.2 - 4.6	7.6 - 7.17	Objection	<p>The text under Housing Growth and Allocation and the Identification of Land for Housing, makes no reference to the Housing Executive's Housing Need Assessment (HNA). The SPPS and the RDS clearly state that the HNA is a factor used to inform the allocation of housing land. Therefore, we believe that the HNA can provide an evidence base to support an increase of a housing allowance in the dPS above the HGI. As the HNA identifies an affordable housing need, in Crumlin, of 180 units for the 15 year period 2015-2030, we believe the total housing growth allocation of 350 units should be uplifted. Currently, the affordable housing need represents approximately 50% of all</p>

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			<p>housing growth. Should the required level of affordable housing be delivered, this would represent a high concentration of social housing in one location, undermining the aim for mixed tenure housing and balanced communities. Without a proportionate increase in the housing allocation for Crumlin, we believe that this would not facilitate a reasonable mix and balance of housing tenures, which the SPPS requires.</p> <p><u>Soundness Tests</u></p> <p>C1: Did the Council take account of the Regional Development Strategy?</p> <p>The RDS states development plans should take account of the HNA to “manage housing growth to achieve sustainable patterns of residential development”.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department?</p> <p>The SPPS states that the Housing Executive’s HNA provides an evidence base that must inform the housing allocation in LDPs, in order to influence a reasonable mix and balance of housing tenures and types.</p> <p>The Housing Executive objects to the DM 17 Homes in Settlements, due to the lack of affordable housing this policy can provide, to meet need.</p> <p>Legislation</p> <p>Section 5 of The Planning Act (Northern Ireland) 2011, states that any person who exercises any function in relation to Local Development Plans (LDP), must exercise that function with the objective of furthering sustainable development. The Strategic Planning Policy Statement (SPPS) identifies three pillars of sustainable development as social aspects, the economy and the environment and, in order for a Plan, policy or decision to be deemed sustainable, there needs to be an integration and balance between these three elements. The SPPS explicitly mentions facilitating sustainable housing growth, including delivery of social and affordable housing, as a societal factor, to ensure sustainable development is considered in plan making.</p>
SP 4.7, DM 17	7.20 - 7.24	Objection	

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<p>However, as the dPS Affordable Housing policy is expected to deliver 199 units, this leaves a shortfall of 1,073 units to meet affordable housing need; this demonstrates a lack of sufficient consideration of social factors within the dPS. This means, policies SP 4 and DM 17 does not contribute to furthering sustainable development, as required by legislation and policy. As a consequence we believe the affordable housing policy is unsound.</p> <p>Draft Programme for Government 2016-2021 (PfG)</p> <p>We welcome that the “Setting the Context” includes reference to the draft Programme for Government 2016-2021 and that the LDP has a supporting role to deliver the 14 Strategic Outcomes. However, we believe the lack of sufficient affordable housing provision in the dPS, means the LDP cannot contribute to the PfG indicators 8 and 48 to “turn the curve” in relation to the number of households in housing stress and to address the gap between the houses we need and the houses we have. These indicators have been identified as important to achieve Outcome 8 “We care for others and we help those in need” and Outcome 13 “We connect people and opportunities through our infrastructure”.</p> <p>Regional Planning Policy</p> <p>The Housing Executive believes that regional planning policy establishes a clear direction that LDPs should provide adequate provision of affordable housing, within mixed tenure developments, in order to meet the needs of the whole community. Therefore, we regard the proposed Affordable Housing Policy, which cannot address affordable housing need, as contrary to the RDS and the SPPS. Both the RDS and the SPPS, state that the provision of more social and affordable housing also helps to build strong balanced communities, facilitating the improvement of communities’ health and well-being.</p>

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			<p>A key aim of the RDS is to Strengthen Community Cohesion by encouraging “mixed housing development. Neighbourhoods with homes in a range of sizes and tenures will allow heterogeneous populations to live together. Diverse populations lead to more stable communities and can help reduce social isolation”.</p> <p>The RDS also contains a goal to “Manage housing growth to achieve sustainable patterns of residential development” and that the “varied housing needs of the whole community need to be met. This includes the availability of affordable and special needs housing.” Therefore, development plans must “Ensure an adequate and available supply of quality housing to meet the needs of everyone...They should also take account of need identified, in the Housing Needs Assessment/Housing Market Analysis when allocating housing land, including land for social and intermediate housing such as shared ownership and affordable housing”.</p> <p>The SPSS also states that the planning system through its influence on the type, location, siting and design of development, such as promoting mixed use developments, mixed tenure housing schemes and strong neighbourhood centres, supports the delivery of shared space. “Shared spaces are places where there is a sense of belonging for everyone, where relationships between people from different backgrounds are most likely to be positive, and where differences are valued and respected.” The SPSS states that an aim to create “well-linked, mixed-tenure neighbourhoods” by offering “a variety of house types, sizes and tenures in housing schemes will therefore help with meeting the diverse needs of all the community and enhance opportunities for shared neighbourhoods” supporting the delivery of good quality housing and the creation of more balanced communities.</p> <p>The SPSS states that the Regional Strategic Policy, which LDPs must reflect is:</p> <p>“to facilitate an adequate and available supply of quality housing to meet the</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<p>needs of everyone; promote more sustainable housing development within existing urban areas; and the provision of mixed housing development with homes in a range of sizes and tenures. This approach to housing will support the need to maximise the use of existing infrastructure and services, and the creation of more balanced sustainable communities.”</p> <p>The SPPS states that the Housing Executive’s HNA is one element which should inform the allocation of housing land within an LDP and the HNA:</p> <p>“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, social housing, supported housing and travellers accommodation. The HNA will influence how LDPs facilitate a reasonable mix and balance of housing tenures and types.”</p> <p>LDP</p> <p>While we support the Plan Objective “to ensure a sufficient supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion” we believe that draft policies SP 4 and DM 17, are not capable of meet this objective. In addition, we are concerned that the reference to ensure sufficient land for affordable housing contained in a POP Plan Objective, has now been removed, and we would like to see this reinstated in the adopted Strategy.</p> <p><u>Soundness Tests</u></p> <p>C1: Did the Council take account of the Regional Development Strategy?</p> <p>The RDS states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone.</p>

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<p>C3: Did the Council take account of policy and guidance issued by the Department? The SPPS and the Planning Act require LDPs to further sustainable development and facilitate and adequate supply of housing to meet the needs of everyone.</p> <p>C4: Has the Plan had regard to other relevant plans, policies and strategies, relating to the Council's districted or to any adjoin Council's district? The PfG Outcome 8 "We care for others and we help those in need" and Outcome 13 "We connect people and opportunities through our infrastructure" contain indicators 8 and 48 to "turn the curve" in relation to the number of households in housing stress and to address the gap between the houses we need and the houses we have.</p> <p>Preferred Options Paper (POP) While the Council held a meeting with the Housing Executive in December 2015, there was no sustained engagement with the Housing Executive to allow us to assist in the formulation of alternative strategies and options within the POP, especially in relation to meeting housing need (Regulation 9 of the Planning (Local Development Plans) Regulations (Northern Ireland) 2015). However, in April 2016, we submitted a "Housing Strategy" paper for Antrim and Newtownabbey, to the Council, which outlined the Housing Executive's preferred strategic policy options in relation to housing. As the POP published in January 2017, did not generate alternative options in relation to operational strategic housing policies including policy options for affordable housing, we are unaware of how the comments within this paper were considered. Despite the lack of operational options set out within the POP, the Housing Executive was content that the POP stated the principles "to provide for identified housing need" and "to ensure a mix of housing types, tenures and size in settlements" would guide the development of housing policy within the LDP. However, we believe that the housing policies in the dPS</p>

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			<p>do not adhere to these principles.</p> <p>Regulation 11 (4) of the Planning (Local Development Plans) Regulations (Northern Ireland) 2015 states that a council must take account of any representations before it prepares the dPS. In our response to the POP we put forward the Housing Executive's preferred option to meet housing need in Antrim and Newtownabbey. Our representation to the POP, in relation to affordable housing, included:</p> <ul style="list-style-type: none"> the LDP should adopt a definition of affordable housing that is in accordance with the definition included within the Strategic Planning Policy Statement (SPPS), as social housing and intermediate housing; there should be a comprehensive affordable housing policy within the Plan, which sets out the need and mechanism for delivery, and addresses issues such as design, location, site selection (if an allocation approach is to be applied) and that an condition or Article 76 planning agreement should be used to secure the delivery of affordable housing; a development management policy should be the primary mechanism to deliver affordable housing in Antrim and Newtownabbey. This would allow for a balanced delivery of units across the council area and can accommodate changing circumstances throughout the 15-year plan period. This best complies with soundness test CE4 "is the plan reasonably flexible to enable it to deal with changing circumstances?" the use of a development management policy should not preclude sites being zoned or containing a Key Site Requirement (KSR), for affordable housing, where there is acute housing need. A KSR, above the proportion set out in a development management system, could be applied to strategic sites. A zoned site could be identified on Housing Executive owned land or where there a few uncommitted housing sites; and the LDP should support mixed tenure residential development. Mixed tenure

Policy	Paragraph / Page	Representation / Support / Objection	Comments
			<p>development supports the development of sustainable and balanced communities. Balanced, cohesive and inclusive communities are aims of the Housing Executive's Corporate Plan and regional planning policy contained in the RDS, and the SPPS.</p> <p>The Council's Preferred Options Paper Public Consultation Report, published in June 2019, lacks detail on affordable housing representations and the Interim Consultation Report does not refer to representations on affordable housing, or our representation as a statutory consultee, under "Meeting the Needs of Society, Residential Development". As the dPS policy for affordable housing will mean there is a significant shortfall in sufficient land to meet affordable housing need, there is no indication that our representations to the POP, or subsequent papers, correspondence and evidence provided by the Housing Executive, have been given appropriate weight or have helped shape the policy proposals contained in the dPS.</p> <p><u>Soundness Test</u></p> <p>P2: Has the Council prepared its Preferred Options Paper (POP) and taken into account any representations made?</p> <p>There is no demonstration that the Council has taken account Housing Executive representations, in relation to affordable housing provision.</p> <p>Evidence</p> <p>Regulation 12 of the 2015 Local Development Plan Regulations, state that the policies contained a development plan document must contain a reasoned justification.</p> <p>The RDS states the LDP should take account of need identified, in the Housing Needs Assessment/Housing Market Analysis (HNA/HMA) when allocating housing land. As well as being established in planning policy, the Housing Executive has a statutory duty to assess housing need, as set out in the 1981 Housing Order and Schedule 3 of The</p>

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			<p>Planning (General Development Procedure) Order (Northern Ireland) 2015.</p> <p>The Housing Executive identified an affordable need of 1,272 units from 2015 to 2030. This relates to social housing need as an indicative need of 77 intermediate units each year, is currently being met by Co Ownership Housing Association. However, as we are aware that DFC is proposing to introduce new intermediate housing products, this need figure for intermediate housing will need to be revised as a new definition is likely to mean a higher level of intermediate housing need will be identified. The dPS policies SP 4 and DM 17 are predicted to provide 199 units, leaving a short fall of 1,073 units. This will deliver only 13 units per annum over a 15 year period, compared to the 85 units required each year to address social housing need. Therefore, as the dPS can only meet 15% of the affordable housing need we are not sure how affordable housing policy has been devised and the evidence base to support it.</p> <p>We would have liked to have had further engagement with the Council in relation to how affordable housing need could be met within the Council area, including proportion and thresholds within an Affordable Housing policy within the dPS and the proportion of affordable housing that could be allocated within the LPP. Without gaining sight of an urban capacity site study, the Housing Executive have stated to the Council that due to low numbers of uncommitted sites, a low threshold should be set, in order that more sites could come forward to meet need. In addition, the affordable housing need of 85 units per annum, represents 15% of the 554 in units per annum in the RDS and 13% of the 650 units per annum of the dPS housing growth figure. However, as the majority of total housing growth is allocated to committed sites, a higher affordable housing proportion than 13% will be required to meet affordable housing need.</p> <p>Paragraph 8.6 of “Evidence Paper 6 – Housing” references 190 programmed units to meet social housing need in the Council area. However, it should be noted that many of</p>

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			<p>the programmed units are not delivered, often due to the difficulties in gaining access to land. Therefore, we believe the dPS is crucial to secure land to meet housing needs. Paragraph 8.6 also states that 350 social housing units have been delivered since 2015 and that social housing units are being delivered at a “healthy rate”. However, despite this rate of new build, social housing need is still increasing, with our 5 year HNA for 2018-23 recording a need of 847 units. The four HNAs since 2015 have recorded an average social housing new build need of 850 units over 5 years. We would like to emphasise that the HNA considers new social housing supply. The Housing Evidence Paper, paragraph 8.7, also states that Housing Executive land could be used to deliver social housing development. However, it should be noted that there are few Housing Executive developable sites in areas of social housing need remaining, where there is land in areas of social housing need (for example, Ballyclare), this has been taken into account in our Housing Need Assessment.</p> <p><u>Soundness Test</u></p> <p>CE2: The strategy, policies and allocations, are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.</p> <p>As the proposed Affordable Housing Policy is expected produce a significant shortfall to meet need, we would like to see the evidence base used in the preparation of draft policies SP 4 and DM 17.</p> <p>The Housing Executive supports a development management approach, as the primary approach to identify land for affordable housing. Therefore, we object to the threshold within the proposal “In residential developments of 40 units or more, affordable housing should be provided at a rate not less than 10% of the total number of units”. As there will be few applications containing 40 or more housing units, the policy will have limited capability of meeting housing needs across the district, especially in rural areas. We</p>

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			<p>would like to see a lower threshold, due to high numbers of committed sites, to meet affordable housing need in rural areas and to promote mixed tenure development. A lower threshold would better meet the statutory obligation to “have due regard to rural needs” as set out in the Rural Needs Act.</p> <p>The Housing Executive’s preferred approach to meeting affordable housing need is a development management approach, which can better provide mixed tenure development across the council area from the adoption of the Plan Strategy. While we believe that an allocation approach could be used in areas of high housing need, we believe a development management approach is more flexible to meet need. A development management policy offers a number of benefits:</p> <ul style="list-style-type: none"> • Only a proportion of the total units on a site will be specified for affordable housing, therefore, it allows for the development of mixed tenure housing; • There are a high number of committed zoned housing sites, to which a KSR cannot be retrospectively applied. The lack of uncommitted sites will limit the number of affordable housing units than can be delivered by an allocation approach; • A DM policy can require a proportion of affordable housing from windfall sites that could come forward during the life of the plan. Windfall can amount to a significant element of housing growth within the life of the plan; • A DM policy can apply to sites with lapsed planning permission or to applications for a renewal or amendment to planning permission; • As the policy is delivered through the development management process it may have a higher chance of delivery than zonings or KSRs, as a planning application has been submitted, indicating an intention on behalf of the developer to bring forward a scheme on the site; • It can provide access to sites in areas where housing associations have traditionally struggled to acquire land for development;

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			<ul style="list-style-type: none"> • A DM policy can also be considered more equitable than other methods of contribution, as all developers of a scheme over the set threshold may have to provide affordable housing; and • KSRs are a snap shot of housing need at a time and they do not provide a mechanism to require a proportion of housing from windfall housing or lapsed sites (including housing zonings with affordable housing provision), should need arise. They may also encourage developers to deliver windfall housing over planned and zoned housing sites in order to avoid a requirement to provide affordable housing. <p>The Local Development Plan timetable, although out of date, establishes a five year time frame from the publication of the draft Plan Strategy, to the adoption of the Local Policies Plan. This means that the LPP may not be in place, or enacted until 2024/25. The affordable housing allowance provided by the draft Plan is able to meet the affordable housing need (calculated on a 15 year basis) for just over two years. This means there will be no planning mechanism capable of addressing affordable need for the remaining two plus years. Therefore, this draft Policy, cannot meet the RDS requirement to “Ensure an adequate and available supply of quality housing to meet the needs of everyone”.</p> <p>In addition, during this timeframe, we believe that a high proportion of the few existing uncommitted sites will become committed as they become subject to planning approvals or pending applications. The lack of uncommitted housing zonings will further curtail the supply of affordable housing sites that the LPP can identify, limiting the LDP’s ability to address the full affordable housing need and therefore the legislative requirement to further sustainable development. If the LPP seeks to address a proportion of affordable housing need through the identification of land, the small number of uncommitted housing zonings, may mean that the whole site is needed for affordable housing. This</p>

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			<p>approach for affordable housing will hinder mixed tenure development and consequently the RDS and SPPS aims to deliver of balanced and sustainable communities.</p> <p>Paragraph 8.8 of “Evidence Paper 6 – Housing” states that the Council will “give consideration” to the zoning of land for social housing at the LPP stage. The Housing Executive would like to see a commitment from the Council that any shortfall <u>will be</u> addressed at the LPP stage.</p> <p><u>Soundness Test</u> CE4: It is reasonable flexible to enable it to deal with changing circumstances We would like additional flexibility to meet affordable housing need, over the plan period than offered by a Key Site Requirement/allocation approach.</p> <p>The Housing Executive welcomes the statement that where new housing land is required, the Council will give preference to previously developed land. We would like this to include Housing Executive land where there has been housing development but housing units have been demolished and the land is now grassed over.</p> <p>While we acknowledge that Policies SP 4 and DM 17 aim to “meet the evolving needs of residents over their lifetimes” and “ensure that new developments are accessible to all”, we would like to see the introduction of Lifetime Homes for all new developments, as opposed to only a proportion of developments of 20 units or more, and that a proportion of wheelchair standard units are required. Lifetime Homes support the changing needs of individuals and families at different stages of life, through the incorporation of 16 design criteria that can be universally applied to new homes at minimal cost.</p>
SP 4	7.18	Support	
SP 4, DM 17	7.40, 7.41	Objection	

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			<p>Policy DM 17.1(d) appears to confuse the provision of Lifetime Homes with wheelchair units, we would like the policy to clearly refer to the provision of both Lifetime Homes and wheelchair standard units. Paragraph 7.39 states "To help meet the full range of housing needs advocated in the SPPS, the Council will also encourage the "Lifetime Homes" approach, as well as delivery of wheelchair accessible housing." We believe that this would be more robust if "encourage" was replaced with "adopt".</p> <p>Currently, demand from people with a disability who wish to own their own homes cannot readily be met, as there is no requirement for market housing to provide Lifetime Homes or wheelchair accessible homes. Accessible housing will allow older and disabled people to feel safe and secure, and to be fully integrated within the community. This is especially important in an aging society.</p> <p>We believe accessible housing policies can help achieve regional policy objectives. One of the eight aims of the RDS is to "Promote development which improves the health and well-being of communities". Regional guidance also aims to strengthen community cohesion by encouraging mixed housing development to allow heterogeneous populations to live together, reducing social isolation, and creating a sense of belonging to everyone.</p> <p>The SPPS identifies an important factor of sustainable development, in relation to the needs and aspirations of our society, is to facilitate sustainable housing growth in response to changing housing need and to progress policies, plans and proposals that can improve the health and wellbeing of local communities, helping to build a strong and shared society. The SPPS contains five core-planning principles, one of which is "Improving Health and Wellbeing", which states that when plan making and decision-making, planning authorities should contribute positively to health and wellbeing. This</p>

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			<p>includes providing for safe and secure age-friendly environments, and by supporting the delivery of homes to meet the full range of housing needs. This core principle also acknowledges how a building can be designed to have a positive impact on how people feel. The core principle to Create and Enhance Shared Space recognises that offering a variety of house types, sizes, and tenures will help meet the diverse needs of the community and provide opportunities for shared and balanced communities. An additional core principle Supporting Good Design and Wellbeing states that “good design can change lives... for the better”; and can promote healthier living, accessibility, and inclusivity.</p> <p>An increased provision of Lifetime Homes and wheelchair units can contribute to achieving outcomes of the draft Programme for Government’s Delivery Plan, (October 2016). These include:</p> <ul style="list-style-type: none"> • We live long and healthy lives; • We care for others and help those in need; • We are a shared society which respects diversity; and • We connect people and opportunities through our infrastructure. <p>Indicators are set out under each outcome. Three related indicators are:</p> <ul style="list-style-type: none"> • Improving the quality of life for people with disabilities and their families; • The number of households in housing stress; and • The gap between the number of houses we need and the number of houses we have. <p>The Delivery Plan states that there is an under-supply of appropriate housing for particular groups, including housing for older people. It also states that there should be more accessible homes for wheelchair users within the private rented and owner occupied sectors.</p>

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			<p>We believe that an increased number of accessible homes can support the outcomes of the Antrim and Newtownabbey Community Plan “Love Living Here” contains “Our citizens enjoy good health and wellbeing”, “Our citizens achieve their full potential” and the “Wildly Important Goal - Our vulnerable people are supported”. Priorities under these outcomes include:</p> <ul style="list-style-type: none"> • The particular needs of an ageing population are met so that our citizens can live long, healthy and independent lives in their own homes if that is their wish. • Our ageing population is supported to live active lives as part of their community. • Our ageing population is supported to live as contentedly and independently as possible for as long as possible. <p>Adequate housing is a human right, essential to human dignity, security, and wellbeing. The UN’s Committee on Economic, Social and Cultural Rights, states that for housing to be adequate, a number of criteria need to be met, including “Accessibility”. Housing is considered inadequate if the specific needs of disadvantaged and marginalized groups are not taken into account. Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, to have due regard to the need to promote equality of opportunity between nine equality categories, including persons with a disability.</p> <p><u>Soundness Tests</u></p> <p>C1: Did the Council take account of the Regional Development Strategy The RDS under RG8 states that the varied housing needs of the whole community need to be met. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone.</p> <p>C2: Did the Council take account of its Community Plan</p>

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			<p>The Community Plan contains outcomes and priorities to support independent living for vulnerable people, and for an aging society.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department</p> <p>The SPPS states that sites should be zoned in larger settlements for housing and Housing Policy Areas in smaller settlements should meet the full range of identified need. It also states that sites or areas within settlements should be identified within the LDP, where a site or part of a site is required to meet one or more category of need.</p> <p>C4: Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining councils' district</p> <p>The draft Programme for Government's Delivery Plan, indicators state that there is an under-supply of appropriate housing for older people. To address this, it states actions should be established, to improve independent living and the provision of suitable homes, including more accessible homes for wheelchair users within the private rented and owner occupied sectors.</p> <p>The Housing Executive supports the requirement for the provision of adequate public open space in new residential developments of 25 units/1 hectare or more which is well designed, safe and accessible and where long term management arrangements have been put in place. We believe the provision of open space is important in the creation of sustainable communities, as it is greatly beneficial to peoples' health and wellbeing and encourages community cohesion. We also support the requirement for adequate private open space provision in new residential developments, in a variety of formats dependent on the type of residential unit proposed, provision of which is particularly important for new family dwellings.</p>
DM 17.6 - 17.8	7.40 & 7.41	Support	

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			<p>Local planning policies have a major impact on the provision of accessible spaces where children and young people can play in safety in their neighbourhoods. This requires the provision of a variety of playable spaces on children's doorsteps, and within easy walking and cycling distance of children's homes and schools. These spaces, and safe routes to them, should be explicitly planned into residential areas and town centres.</p> <p>The Housing Executive recognises play is critical to the lives of children and young people, contributing to their social, physical and emotional health and well-being as well as supporting learning and skills development. The Right to Play is enshrined in the UN Convention on the Rights of the Child (UNCRC 1989), Article 31 which states that all children and young people have the right to play and engage in recreational activities appropriate to their age. As signatories to the UNCRC, all branches of UK government have a responsibility to work towards delivery of the Right to Play.</p> <p>This commitment to delivering the Right to Play is emphasised regionally through The Children's Services Co-operation Act (2015) and The emerging Children and Young Peoples Strategy (2017 to 2027). Additionally one of the draft Programme for Government key high level outcomes is "We give our children and young people the best start in life"; many of the other PfG outcomes are related by the right to play in cross cutting benefits to health, education and the environment.</p> <p>We support the promotion of Town Centre Living initiatives, including LOTS, which can stimulate additional activity and footfall within town centres, thereby assisting regeneration. This will promote accessible retail and services, an important element of sustainable communities. We welcome the reference to the support of residential proposals above other shops and other settlements as this can help promote the vitality and viability of centres. We would encourage LOTS where there is space and facilities to support residential development for example, adequate waste storage or fuel storage</p>
DM 17.9	n/a	Support	

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DM 18G	7.62 – 7.64	Support	<p>places. We would also like to see flexibility parking standards for residential development in town centre locations.</p> <p>We support the aim of policy DM18 to “facilitate sustainable forms of residential development in the countryside of the Borough”, and the Council’s commitment to “balancing the need for additional residential development in the countryside required to sustain our rural communities, with the need to protect and enhance the intrinsic value of the countryside.”</p> <p>We welcome the retention of a rural exceptions policy where a need has been identified by the Housing Executive. While the Housing Executive prefers affordable housing to be delivered through planned development, the inclusion of policy DM 18G will provide flexibility should need rise over the Plan period.</p>
DM 20	7.67 – 7.69	Support	<p>We welcome this policy to ensure that Travellers’ needs are adequately catered for within the LDP. As well as referring to the Design Guide for Traveller Sites in Northern Ireland, the new Model Licence Conditions 2019 for Caravan Sites (published by Department for Infrastructure) and Draft Design Guide for Travellers’ Sites 2019 (published by Department for Communities) will be of relevance, once adopted. Adherence to relevant guidance will assist in the delivery of high quality designed sites, improving living standards for Travellers, thereby improving health and wellbeing.</p>
DM 21	7.70, 7.71	Representation	<p>We welcome this policy to meet the range of accommodation needs of those individuals whose needs cannot be readily met through the provision of general housing. Specialist residential accommodation is needed for those who cannot live independently in their own home. We especially support developing special needs housing such as ExtraCare and dementia friendly homes, to avoid the cost and disruption of adaptations.</p>

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DM 22	7.72 – 7.80	Support	<p>This policy should acknowledge that Supported Housing schemes should be prioritised, within the development management process and flexibility should be applied in the application of residential design standards due to the specific nature of supported accommodation.</p> <p>The Housing Executive supports the criteria in relation to residential extensions.</p>
8. Community Infrastructure			
SP 5, DM 23, DM 24	8.4 – 8.20	Support	<p>The Housing Executive supports these policies to provide good quality, accessible community infrastructure/facilities and to protect areas of existing open space. Open space is important in the creation of sustainable communities, as it is greatly beneficial to peoples' health and wellbeing and encourages community cohesion.</p> <p>The Housing Executive strongly supports open space, especially green open space, which evidence shows brings significant benefits for people's health and wellbeing, helps to create a quality living environment, provides opportunities for play, helps alleviate flood risk and promotes community cohesion. Therefore, we support the open space policies, for the provision and protection of open space.</p> <p>New development should usually conserve wildlife habitats, existing trees and quality vegetation. It should promote further biodiversity by providing open space with uncultivated areas and green corridors. It should also consider the creation of allotments and community gardens, which can encourage healthy lifestyles. Planting of native species in housing developments should also be encouraged, including the promotion of tree-lined streets. We also support the use of landscape strategies within residential developments to ensure that open space is adequate, well designed and is well integrated as part of the development.</p>

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			<p>However, in some circumstances, the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. The Housing Executive therefore strongly welcomes the acknowledgement in paragraph 8.18 that social housing is a “significant community benefit”. In the interests of consistency with other policies within the dPS, we consider that “social housing” should be replaced with “affordable housing”. We refer to the SPPS definition that affordable housing refers to social and intermediate housing and we would like to see the SPPS definition used consistently within the Plan, or in line with any new definition determined by DfC, which is the subject of a recently opened consultation exercise (Definition of Affordable Housing Consultation Paper, DfC June 2019).</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the operation of the open space exception policy in PPS 8. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p> <p>We welcome the reference in paragraph 8.27 to the requirement for developer contributions towards the demand arising for new or enhanced community infrastructure as a result of new development.</p>
9. Placemaking and Good Design			
SP 6, DM 25, DM 27 & DM 28	9.1 - 9.33	Support	<p>The Housing Executive welcomes the adoption of a placemaking approach to development as this can lead to successful places. Placemaking is a people-centred approach to the planning, design and management of places to strengthen the connections between people and the places they share. This links to urban design, as placemaking advocates that buildings should not be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of</p>

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			<p>an area. We support policy DM 25 which requires all development “to deliver high quality design in its layout and appearance” in accordance with the specified criteria, and we welcome the requirement in DM 25.2 that all development proposals should demonstrate that they have taken into account the supplementary planning guidance “Living Places Urban Stewardship and Design Guide” .</p> <p>We support the policy requirement for the submission of Design and Access Statements with applications will help foster placemaking and high quality design, however, we would like to see this requirement applied to all residential development proposals, rather than those for 10 dwellings or more, as even smaller scale residential development should adhere to the core principles of placemaking. SP 6.1 states “The Council will seek to ensure that the principles of placemaking and good design are central to the consideration of all new development proposals in our Borough”, and “All development proposals will be expected to respond to and enhance local character, help create a sense of place and reflect the distinctiveness of the unique places of our Borough”. The requirement to submit Design and Access Statements for residential developments of all sizes would help to encourage the submission of high quality, well designed proposals from the outset.</p> <p>We welcome the Positive Planning Note: Adding Value (page 186) which encourages developers to undertake pre-application community consultation for schemes, irrespective of their size. We consider that community involvement in the development process will enhance design proposals, provide a sense of place, attract investment and improve well-being by providing an opportunity to shape the development of a place to ensure that it meets community needs. The use of models, such as the Place Standard Tool in Scotland can be used to help structure community involvement, as well as aiding planners to take a placemaking approach.</p>

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			<p>As the Home Energy Conservation Authority for Northern Ireland, we welcome policy DM 25.1 - Environmental Resilience. We support the requirement in paragraph 9.17 for all development to demonstrate the ways in which it is responsive to the threat of climate change (and we also note policy SP 10 - Environmental Resilience), through the incorporation of renewable energy/enhanced energy efficiency measures and environmental resilience to the impacts of climate change, especially flooding. We would like to see more detail added to this policy, as the Plan Strategy provides an opportunity to promote the integration of on-site renewable generation, as well as the provision of energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. Developers should be expected to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals.</p> <p>The Housing Executive supports a “fabric-first” approach to energy efficiency in new development, which can help alleviate fuel poverty and deliver quality, sustainable housing.</p> <p>The Committee of Climate Changes Mitigation and Adaptation’s report “UK housing fit for the future?”, published in February 2019, states without a near elimination of greenhouse gas emissions from UK buildings, the UK’s legally binding climate change targets will not be met. It also states that energy use in homes accounts for 14% of UK total emissions. The Housing Executive believes that new homes should be designed to be energy efficient, low carbon, water efficient, and climate resilient.</p>
10. Historic Environment			
SP7, DM 30 - 36	10.1 – 10.75	Support	<p>The Housing Executive supports policies that protect our built environment and heritage. These will help promote and enhance a sense of place and belonging to an area, aid the wellbeing of residents, attract tourists, act as a stimulus for regeneration and provide</p>

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			leisure and educational value.
11. Natural Heritage			
SP 8, DM 37 - 42	11.1 – 11.53	Support	<p>The Housing Executive supports policies that protect our natural heritage assets and resources. These will help contribute to the quality of life of residents, promote and maintain local identity, and provide opportunities for recreation, education and tourism.</p> <p>We welcome the “Positive Planning Note: Adding Value” on page 248, which suggests the use of Swift nest bricks or nest boxes within new development schemes as a means of promoting biodiversity by reversing the decline of the swift, which has been declared the “Bird of the Borough” by the Council. While we are supportive of the content of the “Positive Planning Note”, we are unsure what weight this can be given in the development management process, therefore we would like to see the proposals for this and other “Positive Planning Notes” embedded in planning policy.</p> <p>We strongly welcome policy DM 42: Trees and Development. Northern Ireland is the least wooded region in Europe, with 7% wood cover, compared to a European average of 44%. Of the trees in Northern Ireland, 80% are recent conifer plantations, as opposed to native species, which can better support wildlife and biodiversity. The provision of trees and green open space include can aid flood protection and water management, increase biodiversity, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.</p> <p>The Housing Executive believes it is important to protect and create woodland and to increase the number of trees within cities and towns. A recent report by UCD stated that tree lined streets increase the value of homes, increase wellbeing of people and raise the IQ of children. We would like policy DM 42 to encourage tree lined streets</p>

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			<p>within new developments, this urban greening would help to achieve the aim set out in paragraph 11.47: “the policy promotes the achievement of a net gain in tree numbers by virtue of new development” and can result in both health and environmental benefits.</p> <p>We welcome that DM 42.3 allows the Council to require supplementary replacement planning, where trees are lost due to the development proposal. However, we also note that increasing numbers of applicants are removing trees before submitting a planning application. In these instances, where trees have been recently removed we would like to see conditions attached to planning permission also requiring supplementary tree planting.</p>
12. Natural Resources			
SP 9, DM 45	12.1 – 12.3, 12.10 & 12.11, 12.22 – 12.32	Support	The Housing Executive, as the Home Energy Conservation Authority for Northern Ireland, supports maximising the opportunities to develop renewable energy generation facilities in appropriate locations, as these can bring many social, economic and environmental benefits. Renewable energy schemes can reduce fuel poverty for local people and help improve air quality, thereby increasing health and wellbeing.
13. Environmental Resilience and Protection			
SP 10, DM 46 – 52	13.1 – 13.55	Support	<p>Section 3 of 2011 Planning Act states councils should keep a review of matters; which may be expected to affect the development of its district. These matters include the potential impact of climate change; therefore, we strongly welcome policies, which aim to address environmental challenges through the LDP, such as climate change, greenhouse gas emissions, waste production, land contamination and flooding.</p> <p>We support the integration of transport and patterns of development, which reduce the need to travel, to promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times. We note that reducing travel demand through integration of land-use planning and transport is a key</p>

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			<p>objective of the draft PFG delivery plans.</p> <p>The Housing Executive supports a “fabric-first” approach to energy efficiency in new development, which can help alleviate fuel poverty and deliver quality, sustainable housing.</p> <p>We welcome the Positive Planning Note: Adding Value (page 283) and we would like to see more detail and for the proposal to be included in policy, to give it sufficient weight in the development management process. The Plan Strategy provides an opportunity to promote the integration of on-site renewable generation, as well as the provision of energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. Developers should be <i>expected</i> to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals, rather than simply encouraged.</p> <p>Flooding causes a detrimental effect on people’s health and wellbeing, on the local environment and the economy. We welcome policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome the promotion of the use of Sustainable Urban Drainage Systems and the need for drainage assessments to be provided for all new residential developments in areas where there is evidence of/potential for surface water flooding and in other circumstances as specified in policy DM 47.</p> <p>We welcome policy DM 50: Pollution. The impacts and dangers associated with air pollution are becoming increasingly recognised. Poor air quality is the largest</p>

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			<p>environmental risk to public health in the UK. Long-term exposure can cause cardiovascular and respiratory diseases and lung cancer, reducing life years. Short-term exposure to higher levels of air pollution can affect lung function, asthma, and cardiovascular and respiratory systems. The WHO estimates that “Most sources of outdoor air pollution are beyond the control of individuals and demands concerted action by local, national and regional level policy-makers”. Measures to tackle air pollution should be taken at the local, national and international levels, taking effective action to reduce pollution at source.</p> <p>We also support policy DM 52: Contaminated Land, and recognise that site investigations and risk assessments with remediation measures where necessary are important to ensure there is no unacceptable risk to health or the natural environment as a result of development, particularly on brownfield land.</p>
14. Monitoring of Our Plan			
Monitoring of Our Plan	14.1 – 14.12	Support	<p>We welcome the inclusion of the number of new homes by tenure delivered as an indicator, however, we would like the Housing Executive’s Housing Needs Assessment also included as a measure to demonstrate need trends, whether there is increasing or decreasing need, over the monitoring period, which may need to trigger a Plan Amendment.</p> <p>We also welcome the inclusion of an indicator to measure the number of Lifetime Homes approved, however, we would also like to see the number of wheelchair units approved included as an indicator.</p>

