
Local Development Plan Team
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

5th December 2019

Dear Michael

The Housing Executive welcomes the publication of Mid and East Antrim Borough Council's Local Development Plan (LDP) draft Plan Strategy (dPS). We support the Vision and Strategic Objectives and many of the policies contained within the dPS, and believe these will provide a positive direction for the development and growth of Mid and East Antrim, to 2030. We believe this policy document will be central to promoting sustainable development, sustainable communities and place making.

As the Council has engaged and consulted with the Housing Executive on affordable housing in the LDP, we are largely content with the housing policy aims, and the majority of housing policies within the dPS. We especially welcome the dPS aims:

- "To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs"; and
- To promote high quality design standards in all development so as to reflect local distinctiveness and further positive placemaking."

We strongly support Policy HOU5, which by requiring a 20% proportion of affordable housing, in main and small towns and a 10% proportion in villages and small settlements in developments of 10 units or more, or 0.2 hectares or more, will help meet affordable housing need throughout the Borough. The implementation of this Policy can help achieve the Regional Development Strategy's (RDS) objectives to meet the housing needs of the whole community, including affordable and special needs housing and to encourage mixed housing development as a way to strengthen community cohesion.

While we have included an objection, we would welcome discussing this with the Council to explain our concern and potentially, agree a joint position before an Independent Examination. In addition, we would like an opportunity to assist the Council and provide information on how Policy HOU5 can be best implemented.

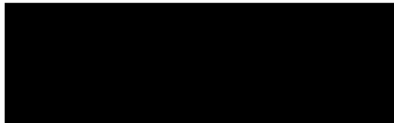
As we strongly support many of the Policies within the dPS, we believe that these should be implemented at present, on prematurity grounds. This is supported by the Strategic

Planning Policy Statement (SPPS) and the Joint Ministerial Statement (JMS)
'Development Plans and Implementation of the Regional Development Strategy', which we
believe remains a material consideration in the determination of planning applications.
We would also like to attend an Independent Examination to present evidence and
information associated with our representation.

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

I trust this information is of assistance,

Yours sincerely

A solid black rectangular box used to redact the signature of Clark Bailie.

 **Clark Bailie**
Chief Executive

Housing Executive Response to Mid and East Antrim Local Development Plan Draft Plan Strategy

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Prematurity			<p>The Housing Executive would like further information on how prematurity could 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.</p> <p>We believe that the dPS should be a material consideration in the determination of planning applications in Mid and East Antrim, as the extant plans (Ballymena Area Plan 1986-2001, Larne Area Plan 2010, and the Carrickfergus Area Plan 2001) and the draft Belfast Metropolitan Area Plan 2015 are now out of date and were prepared before the publication of the current Regional Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p>
Developer			<p>We strongly support the introduction of Developer Contributions, within the dPS, which</p>

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Contributions			<p>means that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The Housing Executive would also like to see a developer contribution to help provide affordable housing. Developer contributions for affordable housing 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 Borough. 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>In addition, we believe a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.</p>
PART 1			
Setting the Context			
Setting the Context	26 - 31	Support	<p>The Lifetime Opportunities – Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland 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> <p>We believe that the housing policies within the LDP should aim to ensure that new residential developments provide adequate homes, for all in the Mid and East Antrim Borough Council area.</p>

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			<p>The UN defines an adequate home 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>The ability for all to be housed in an adequate home is a necessary prerequisite to achieve the outcomes and strategic priorities of each theme within the Community Plan “Putting People First”.</p> <p>We believe that mixed tenure development and an adequate supply of affordable and accessible housing can help achieve sustainable, balanced and cohesive communities and contribute to a sense of belonging and a reduction in health inequalities, which help meet the objectives of the Council’s Community Plan.</p>
Plan Vision & Strategic Objectives			
Plan Vision	42	Support	<p>The Housing Executive welcomes that the LDP vision is primarily based on the vision of the MEA Community Plan as this will to encourage synergy between the two plans. We also support that LDP vision has been tailored to include an emphasis on place making.</p>
Strategic Objectives	44-46	Support	<p>We support the Strategic Objectives, of particular importance to the Housing Executive are:</p> <ul style="list-style-type: none"> • Economic objective G “To support the generation of energy, particularly from renewable sources, in a balanced way that takes due account of environmental impacts

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			<p>and on sensitive or vulnerable landscapes.”</p> <ul style="list-style-type: none"> • Social Objectives C and D “To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs” and “To deliver quality residential environments (including associated public open space and linkages to green infrastructure networks);” and • Environmental Objective 1 “To promote high quality design standards in all development so as to reflect local distinctiveness and further positive placemaking.”
Spatial Growth Strategy and Countryside Strategy			
Spatial Growth Strategy (SGS1)	50-55	Support	<p>The Housing Executive supports the Spatial Growth Strategy, which is closely linked to the RDS Spatial Framework Guidance and the acknowledgement that this will influence the allocation of land for development and housing and the Local Polices Plan. We believe the proposed SGS will help promote sustainable development in the Council area.</p> <p>We also support the statement that housing zonings will ensure land availability over the plan period to meet housing needs. We welcome that in main towns’ residential development will be focused within the urban fabric and brownfield land, which will encourage compact urban forms and accessibility to services, and that appropriately scaled residential development, can be accommodated in villages and small settlements.</p>
Settlement Hierarchy (SGS2)	58	Support	<p>The Housing Executive generally supports the proposed settlement hierarchy and the identification of the settlements for each tier. While we understand that Portlengone does not have the population of 5,000 to be defined as a small town, according to the NISRA definition, we do believe that Portlengone has a level of services and facilities to be described as a small town in the RDSs Hierarchy of Settlements and Related Infrastructure.</p>

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Strategic Housing Allocation to Settlements (SGS3)	62	Support	<p>Therefore we believe that Portglenone could be treated an exceptional case, within the Spatial Framework as a village which could support further growth, beyond other villages.</p> <p>The Housing Executive believes the allocation of housing to settlements is logical and takes adequate account of the Housing Evaluation Framework contained in the RDS. However, we would like to see some flexibility to the allocation figures over the plan period, especially in settlements where there is an existing or arising affordable housing need as identified by the Housing Executive's Housing Need Assessments. We believe that the proposed "plan, monitor and manage" approach can help ensure that there is sufficient housing land, including land for affordable housing, over the Plan period.</p>
Strategic Projection of Zoned Housing Land (SGS4)	64	Support	<p>The Housing Executive supports this policy, which will protect housing land, in order to meet housing need over the Plan period and to ensure there is adequate housing land to meet need. We understand this policy will be enacted once the PS is adopted and that extant housing zonings will be protected. However, we believe that the protection of any current housing sites, prior to LPP adoption, which do not meet the sequential test or undermine the achievement of sustainable development, may be undesirable. In these instances, we would like to see sustainable development included as a material consideration in the assessment of planning applications.</p>
Management of Housing Supply (SGS5)	67	Representation	<p>The Housing Executive generally supports the management of housing supply, which includes a sequential approach and the phasing of housing land in the three main towns and Greenisland. We specifically welcome the statements in paragraphs 5.3.18 and 5.3.20 that allow the allocation of additional land and Phase 1 land outside urban footprints to meet affordable housing need, as identified by the Housing Executive, where it cannot be readily met elsewhere. However, while we welcome this exception set out in point D</p>

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Economic Development Strategy (SG56)	75	Support	<p>within the Policy box under “Remaining Small Towns”, we would also like to see this set out as an additional point within the policy box for “Main towns and Greenisland”. This would make the policy box consistent with the text in paragraph 5.3.18.</p> <p>The Housing Executive supports the Strategic Allocation of Land for Economic Development, which focuses economic zonings in the three main hubs. We believe that these towns will be accessible to the majority of residents in Mid and East Antrim, and are well served by public transport. We welcome opportunities for business growth within the settlement limits and would like to see a sequential approach to the allocation of employment land where land outside development limits is only considered where there are no suitable sites available in towns and villages, and is of an appropriate scale.</p>
Retail Strategy (SG57)	76	Support	<p>The Housing Executive supports the retail hierarchy, and the town centre first approach. As town centres are more accessible by all forms of transport, we believe this approach will ensure local people can readily access services and facilities in a sustainable manner. We also support the designation of local centres, as this will help to define and protect their role in meeting the day-to-day needs of their surrounding hinterland.</p>
Transport Strategy	82 & 83	Support	<p>The Housing Executive strongly supports the Transport Objectives. We believe these will promote the integration of transport and patterns of development, which reduce the need to travel, 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 the plan objective to reduce travel demand through integration of land-use planning and transport aligns with a key objective of the draft PfG delivery plans.</p>
			Due to different car ownership levels for social housing, than other tenures of

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Open Space Strategy (SGS9)	86	Support	<p>development (55% of social housing tenants do not have access to a car, NIHE 2018) we strongly support the promotion of public transport and active travel networks to provide accessibility and connectivity for all.</p> <p>The Housing Executive supports the intention to provide a strategic policy framework for the provision and protection of green and blue infrastructure within the Borough. We note Belfast City Council have produced a draft Green and Blue Infrastructure Strategy, an Open Space Strategy, and propose a range of new strategies and plans for Belfast on the open space typologies set out under SGS9. Therefore, while we support the SGS09 we believe there may be an opportunity for the Council to develop further comprehensive open space strategies.</p> <p>The Housing Executive believes that master planning would provide a strategic approach in the creation of new open space that forms part of a network. We believe that in strategic development sites, and in areas which are in an 'accessibility hot spot', potential open space areas could be allocated and protected within the Local Policies Plan of the LDP. The delivery of these sites could be funded by developer contributions. This would ensure a cohesive approach in the delivery of new spaces, which are not subject to a reactive and possibly piecemeal approach.</p> <p>The Housing Executive supports the policy aims to facilitate development that contributes to a sustainable rural economy and to protect and conserve the rural landscape, heritage assets and the environment. However, we would like to see the policy aims expanded to allow development that also contributes to a sustainable rural community, not solely the rural economy. This would better promote sustainable development, where equal weight should be given to social, economic and environmental factors.</p>
Countryside Strategy	92 & 93	Representation	

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Special Countryside Area (CS2)	93	Support	The Housing Executive supports this policy to protect sensitive landscapes from excessive and inappropriate development. We would like to see affordable housing need met within settlement limits within these locations, as a rural exceptions policy may not be suitable within Special Countryside Areas. Therefore, we may wish to examine at the Local Policies Plan stage zoning land for affordable housing or revising the proportion for affordable housing on housing land through a Key Site Requirement. Currently, there is a social housing need in Carnlough, so we would like to see if there is an opportunity to uplift the proportion for affordable housing in this location, due to local circumstances, at LPP stage.
Rural Landscape Wedges (CS4)	99	Support	The Housing Executive supports rural landscape wedges, which can help promote compact urban forms where amenities and services are closer to the communities they serve.
Antrim Coast and Glens AONB (CS5)	100	Support	The Housing Executive supports we support this policy, which seeks to protect, conserve, and where possible enhance the scenic quality and distinctive character of the Antrim Coast and Glens AONB from inappropriate development. This will help conserve the natural beauty and landscape of the area, thereby, contributing to the well-being of local people and visitors.
Developed Coast (CS6)	102	Support	The Housing Executive welcomes this policy which will help protect the coast from unacceptable development but would allow flood defences, and development to provide public access and environmental benefit. This will assist the regeneration of coastal areas and will encourage recreation leading to active lifestyles, promoting health and well-being of communities.
Local Landscape	104	Support	The Housing Executive supports LLPAs that protect environmental assets. This helps

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Policy Areas (CS7)			enhance a sense of place and promotes quality development.
Protection of Main River Corridors (CS8)	106	Support	We support the protection of river corridors to maintain or enhance biodiversity, water quality and to restrict development that could result in increased flooding.
Land Instability and Coastal Erosion (CS 9)	109	Support	The Housing Executive welcomes the policy to ensure safe development that minimises the risk to health and safety.
PART 2			
General Policy for All Development			
General Policy for All Development (GP1)	114-116	Representation	<p>The Housing Executive welcomes this policy, which ensures quality developments that protect the environment and provide benefits to local people. The Housing Executive supports an approach where proposals will be granted planning permission where they contribute to sustainable development. Therefore, we would like to see proposals assessed with reference to the positive and negative effects they will have on economic, environmental and social factors.</p> <p>While we welcome criteria e) v., to take account of the efficient use of energy, water and other resources, we would like to see more detail added to this policy, or a new policy dedicated to climate change and resilience developed. We would like to see developers expected to demonstrate that measures to reduce energy consumption and sustainable design solutions have been considered and incorporated into their proposals.</p> <p>We also support the precautionary principle, where evidence of environmental or human</p>

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			<p>health hazards is uncertain. We would like to see a restriction for development that may present a potential risk to health, protecting the public from exposures to harm; and that any adverse effects are mitigated.</p> <p>In addition, we would like to see the inclusion of Health Impact Assessments for major development. The Housing Executive 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 requirement for planning applications in GB and they can help meet the SPPS and Community Planning objective to improve health and wellbeing.</p>
Sustainable Economic Growth			
Sustainable Economic Growth	121	Representation	<p>The Housing Executive is supportive of the dps's economic policies. However we would like to see a policy that encourages the use of social clauses, for major development to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed to 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>
Economic Development in	124	Support	<p>The Housing Executive welcomes the policy focus on enterprise and employment growth within the main towns across the Borough. We welcome the sequential approach used to</p>

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Settlements (ECD1)			identify employment land, which directs employment to the Hubs and local towns first. 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. Therefore, we would like to see a statement which explicitly states that economic development sites that are accessible by public transport will be included in a sequential test. 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.
Retention of Economic Development Land (ECD2)	126	Support	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 Executive supports the presumption against the alternative use of land zoned for economic development, which aligns with the RDS principle to maintain an adequate supply of employment land throughout the Plan period. We would also like to see the Policy state that 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.
Development incompatible with Economic Development Uses	127	Support	We welcome this policy which by not permitting adjacent incompatible uses to economic development can protect residential amenity. This will ensure that local residents are not adversely affected by any industrial emissions, noise or heavy traffic.
Economic Development in the Countryside	128	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. This will help protect

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(ECD4)			rural character.
Retailing and Town Centres, (RET1- RET4)	132-139	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 policy within the SPPs. We welcome that paragraph 7.29.9 states that the LDP will promote diversity in the range of town centre uses, including residential use under policies HOU2 and HOU4.
New and Extended Holiday Parks in the Countryside (TOU7)	150	Representation	This policy could direct applicants to the new "Model Licence Conditions 2019", for caravan sites, published by the Department for Infrastructure.
Building Sustainable Communities			
Quality in New Residential Developments (HOU1)	172	Representation	<p>The Housing Executive supports this policy, which will aid good design and place making. We also welcome a policy, which allows for increased density where appropriate and where close to services, this will reduce the need to travel and will enable sustainable development.</p> <p>While we welcome the proposal that all new dwellings in established residential areas should be built to a size standard, set out in Appendix F, we believe these standards should be adopted for all new housing. These standards accord to social housing space standards, which ensure that homes are large enough to meet the needs of occupiers. The Royal Institute of British Architects states space in housing has a significant ongoing effect on</p>

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			<p>quality of life and “A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, and exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion”.</p> <p>We also support the proposal that all residential units should be accompanied by a concept statement.</p> <p>We support the requirement for adequate open space provision in new residential developments, which is particularly important for new family dwellings. We would welcome a statement stating that open space should be in a variety of formats dependent on the type of residential units proposed. In addition, we would like to see planting of native species in housing developments encouraged, including the promotion of tree-lined streets.</p> <p>The Housing Executive believes there is an opportunity for the Policy to promote energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. We note that in England, fossil fuel boilers in new homes are being phased out by 2025, so we would like to see renewable heating sources and carbon neutral homes encouraged within the dps.</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 UKs legally binding climate change targets will not be met. It also states that energy use in homes, excluding heating, accounts for 14% of UK total emissions. As the Home Energy Conservation Authority for Northern Ireland, the</p>

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			Housing Executive believes that new homes should be designed to be energy efficient, low carbon, water efficient, and climate resilient. A future proofed home looking holistically to meet the changed climate, and demographic and social needs, will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate the environmental impacts of housing.
The Conversion or Change of Use of Existing Buildings to Flats or Apartments (HOU2)	175	Support	The Housing Executive supports this policy and we specifically welcome the reference to Living Over The Shops, which can help promote the regeneration of town centres.
Residential Extensions and Alterations (HOU3)	176	Support	The Housing Executive supports the proposed policy on extensions and alterations, which can enhance the flexibility, resilience, and endurance of a dwelling, allowing it to adapt to different users and their needs.
Protected Town Centre Living Areas (HOU 4)	177	Support	We strongly support increasing the supply of affordable homes through protecting town centre living areas, by 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

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Affordable Housing in Settlements (HOU5)	178	Support	<p>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.</p> <p>We strongly support the affordable housing policy which meets the aims of the RDS, SPPS, and the LDP of providing a mix of tenures, to meet need and to create cohesive and balanced communities.</p> <p>We support the threshold of ten or more dwelling units, or on a site of 0.2 hectares, or more and the minimum 20% in towns and the 10% requirement in villages and small settlements. We believe this will address affordable housing need, while respecting the draft Plan's Spatial Growth Strategy. As there is a high level of committed housing sites, we believe that the ten unit threshold is appropriate to maximise the number of sites to which the policy can be applied.</p> <p>This policy approach will help ensure mixed tenure development and sustainable communities. This will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area based deprivation.</p> <p>Currently, we support the definition of affordable housing as defined by the SPPS. We understand the number of intermediate products may be expanded in the future, following the DFC consultation on the Definition of Affordable Housing. We would like any change to the definition to include the following criteria:</p> <ul style="list-style-type: none"> the affordable housing is delivered by a registered housing association; the affordable housing is allocated by a housing association to eligible households

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			<p>who cannot access market housing; and</p> <ul style="list-style-type: none"> the affordable housing units should remain at an affordable price for future eligible households or if these restrictions are lifted, the subsidy shall be recycled for alternative affordable housing provision. <p>We welcome that it is stated that the Housing Executive has a role in the identification of need and the applicant is advised to liaise closely with a Housing Association to discuss the affordable housing requirement.</p> <p>We support the statement in paragraph 8.1.39 that in some instances there may be the potential for a higher proportion of affordable housing and that the proportion of affordable housing can be adjusted through a key site requirement within the Local Policies Plan, which will be important in areas where there is an acute housing need.</p> <p>We would support the delivery of affordable housing being secured by a Section 76 planning agreement, with conditions used on outline applications, and some small schemes only. A planning agreement can include more detail, better ensuring the units are compliant with policy.</p> <p>We would welcome some additional statements:</p> <ul style="list-style-type: none"> The development should be tenure blind and integrated with market housing. This will ensure that there is a genuine housing mix, promoting more cohesive communities; and The social housing is delivered to DFC's Housing Association Guide Standards. <p>We believe that supplementary planning guidance will help effective implementation of the policy and the development of units to meet need, and we would welcome assisting</p>

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Housing Mix (HOU6)	180	Support	<p>the Council in the preparation of guidance.</p> <p>The Housing Executive strongly supports this policy, which will help meet housing needs in the borough and will promote mixed tenure development to help ensure balanced communities. Well-designed neighbourhoods provide a variety and choice of homes to suit all needs and ages, this includes people who require affordable housing, families, older people, students and people with physical difficulties or mental health needs.</p>
Adaptable and Accessible Homes (HOU7)	181	Support	<p>The Housing Executive strongly supports the policy criteria to help ensure new homes are adaptable, which will help the Council meet the SPPS and RDS requirements to meet the housing needs for all, and to promote development, which improves health and well-being. These homes will also promote social inclusion and meet the needs of people of different ages and abilities.</p>
		Objection	<p>However, we would like to see a requirement for a proportion of wheelchair standard dwellings to be delivered as these units can better meet the needs of wheelchair users. 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 wheelchair accessible homes.</p> <p>A proportion of social housing schemes are now required to provide wheelchair standard units, with a target of 10% to be developed by 2020/2021, therefore, we believe it is reasonable that a similar proportion is required of the private sector to help meet the needs of wheelchair users who wish to own their own homes.</p> <p>In addition, we would like to see a policy with the dps for Supported Housing. Supported housing is for individuals who cannot live independently in their own home. They require</p>

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			<p>extra housing support and/or an element of care in addition to a home. Accommodation can take the form of self-contained or shared accommodation. The term 'shared housing' is used to describe accommodation for two or more persons with shared facilities, e.g. bathroom, kitchen, communal living room or dining room. Shared housing can include clusters of dwellings, group homes or hostels.</p> <p>Supported housing need is identified, for a three-year programme, through a commissioning process with partners including the Housing Executive, the Health and Social Care Board, Health Trusts and the Probation Board.</p> <p>As Supported housing need is not projected on a long-term basis, we would recommend that a development management policy in respect of Supported housing is included within the LDP. This policy should acknowledge that Supported housing schemes should be prioritised and flexibility should be applied in the application of residential design standards due to the specific nature of supported accommodation.</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. Therefore we believe a wheelchair standard housing requirement and a Supported Housing Policy would help promote sustainable development.</p> <p>An increased provision wheelchair units and Supported housing can contribute to achieving outcomes of the draft Programme for Government's Delivery Plan, (October 2016). These include:</p>

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			<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> <p>We note there is a statutory link between LDPs and Community Plans, therefore, we would like to see the LDP help achieve Mid and East Antrim Community Plan's "Putting People First" priorities:</p> <ul style="list-style-type: none"> • Our older people are active, respected and supported by their community; • Our people are able to enjoy longer and healthier lives; • Our people feel safe in their community and have a sense of belonging to an area; and • Our borough has vibrant, shared and cohesive communities. <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</p>

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			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>Soundness Tests</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 The Community Plan states that infrastructure projects being considered include housing developments and supported living to support the needs of older people and those with disabilities, to support independent living for vulnerable people, and for an aging society". We believe the Plan Strategy can have an important role to help deliver this Community Plan action.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department 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.</p> <p>C4: Has the plan had regard to other relevant plans, policies and strategies relating to</p>

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			<p>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>
Travellers' Accommodation (HOU8)	182	Support	<p>We welcome this policy to ensure that Travellers' needs are adequately catered for within the LDP. There is an opportunity for the Policy to refer 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). Adherence to relevant guidance will assist in the delivery of high quality designed sites, improving living standards for Travellers, thereby improving health and wellbeing. It should be noted that the Housing Need Assessment, carried out by the Housing Executive, for Travellers, is in relation to the housing needs of Irish Travellers, only.</p>
Affordable Housing in the Countryside (HOU16)	193	Support	<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 HOU16 will provide flexibility should need rise over the Plan period. We support the restriction that planning permission will only be given where applications are submitted by a Housing Association but we would also welcome the inclusion of the Housing Executive within this statement. For clarification, we would like to see the Policy state that while the Housing Executive identifies affordable housing need; the onus will be upon the applicant to demonstrate there are no alternative available sites within settlement limits. The Housing Executive, in</p>

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			conjunction with DOE, produced a Joint Protocol for the implementation of CTY5 of PPS 21. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when applying for planning permission under this Policy.
Open Space, Sport and Leisure			
OSL1 Protection of Open Space	194	Support / Representation	<p>The Housing Executive supports these policies to provide good quality, accessible public open space 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, helps to create a quality living environment, provides opportunities for play, helps alleviate flood risk and encourages community cohesion. It can also support wildlife and biodiversity, improve connectivity and attract investment in the Borough's economy.</p> <p>However, we recognise that 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 supports the general presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space. However, we would like to see the provision of affordable housing included as an example of a substantial community benefit. We would like to see the Justification and Amplification state that generally the community should be in support of the development and that applications should demonstrate they have consulted the community, even if the development is not classified as 'major' and how community views have been taken into account. 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</p>

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OSL2 Greenways	196	Support	<p>implementing an exception to this policy.</p> <p>The Housing Executive agrees with the policy approach (OSL2) to protect and enhance greenways across the Borough, which will form part of a multi-functional green and blue infrastructure network. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion, pollution and greenhouse gas emissions. 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, providing wildlife corridors, 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. In order to promote further the use of greenways, we believe that bike hire stations along greenways could further connect people, and encourage people to cycle, over a longer distance than walking.</p>
OSL3 New Open Space Provision, OSL4 Public Open Space in New Residential Development, OSL5 Sport and Outdoor Recreation Facilities	196 - 202	Support	<p>The Housing Executive welcomes these policies in relation to the provision of public open space. We support the requirement for the provision of adequate, integral public open space in new residential developments of 25 units/1 hectare or more. We believe the provision of open space and its long-term maintenance and management is important in the creation of sustainable communities, as it is greatly beneficial to peoples' health and wellbeing and encourages community cohesion. Paragraph 8.2.11 states that 'It is important, that children's play areas and facilities are located within a reasonable walking distance of where they live', we would like to see a requirement that such play areas are easily accessible, to meet the needs of disabled people and that children can access them safely, for example, using pedestrian crossings. These spaces, and safe routes to them,</p>

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			<p>should be explicitly planned into residential areas and town centres.</p> <p>The Housing Executive recognises that 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 welcome the reference in paragraph 8.2.11 to the potential for developer contributions to be sought for new or upgraded play facilities in the locality and note that a guidance framework on planning agreements and developer contributions will be developed by Council in the future as stated in paragraph 8.2.16.</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. Natural rewilding is an effective way of producing rich habitats and can recover biodiversity loss.</p>

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OSL6 Community Growing Spaces and Allotments	206	Support	We strongly support the development of Community Growing Spaces and Allotments, which can encourage healthy lifestyles and promote community cohesion.
COM1 Education, Health, Community and Cultural Facilities	209	Support	<p>We support the allocation of land for education, health, community and cultural facilities within COM1. The Housing Executive supports this Policy to protect land for community and cultural facilities and public services. These services and facilities are necessary components of sustainable communities.</p> <p>In addition, we would like to see a developer contribution policy, where the uplift in land values generated by the granting of planning permission should help fund additional community infrastructure that is needed to contribute to the development of sustainable communities and their well-being.</p>
Transportation, Infrastructure and Connectivity			
TR4 Disused Transport Routes	219	Support	The Housing Executive agrees with the policy aim to protect disused transport routes identified in the Plan for re-use for transport purposes, or for alternative appropriate recreational, nature conservation or tourism related uses which will deliver environmental, social or economic benefits. Policies which support active travel can improve health and wellbeing and help mitigate the effects of climate change by promoting a modal shift away from the car.
TR5 Active Travel	220	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 76% of the Borough's residents travel to work by car (2011 Census figures).</p> <p>We note that reducing travel demand through the integration of land-use planning and</p>

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TR6 Parking and Servicing	221	Representation	<p>transport is a key objective of the draft Programme for Government delivery plans and we support the measures outlined in the Transport Strategy (5.7, pages 82 and 83) and policy TR5 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 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.</p> <p>In relation to policy TR6, 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, (55% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).</p>
Flood Risk and Drainage			
FRD1 – FRD6 Flooding	226 - 235	Support	<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 support actions which can increase resilience to climate change and which are important ways to assist flood prevention. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome the need for drainage assessments to be provided for all new residential developments in areas where there is evidence of/potential for surface water</p>

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Renewable Energy			
RE1 Renewable Energy Development	238	Support	<p>flooding and in other circumstances as specified in policy FRD3. We support the promotion of the use of Sustainable Urban Drainage Systems, which can be used effectively to manage surface water run-off by, for example, the use of green roofs/walls, tree pits and swales, which help integrate green and blue infrastructure into the public realm/buildings and enhance nature conservation and biodiversity.</p> <p>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 and protecting health and wellbeing.</p>
Telecommunications and Overhead Cables			
TOC1 Telecommunications Development and Overhead Cables	244	Support	<p>We recognise that access to high-speed broadband is essential for sustainable economic development and can help reduce social isolation and provide access to services. We therefore support this policy, which aims to facilitate the development of telecommunications and utilities infrastructure in appropriate locations while minimising the environmental impact of such infrastructure.</p>
Water and Wastewater (Sewerage) Infrastructure			
WW1 Development Relying on Non-Mains Wastewater	249	Support	<p>The Housing Executive supports this policy, which seeks to ensure that proposals for new development relying on non-mains wastewater infrastructure, either individually or cumulatively do not increase the risk of pollution, which is in the interests of sustainable development. We support the requirement for developer contributions towards infrastructure upgrade costs to facilitate development.</p>

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Infrastructure			
Stewardship of Our Built Environment and Creating Places			
HE1 – HE9 Historic Environment Policies	263 – 283	Support	<p>We support the Historic Environment policies which aim to 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 leisure and educational value.</p> <p>We believe that underused and vacant unlisted locally important buildings or vernacular buildings have the potential to become catalysts for regeneration, through sympathetic adaptive reuse. This sustainable approach preserves important elements of identity and local distinctiveness.</p>
SFA1 Strategic Focus Areas	293	Support	<p>The Housing Executive supports the place-making approach set out within this policy as this can lead to successful places. Place making links with urban design, as this approach 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 an area. We support the policy approach of designating distinctive urban areas as Strategic Focus Areas, in order to promote good place-making in such areas and support their successful and sustainable development. However, we would like to see a place making approach being delivered in all areas.</p>
Safeguarding our Natural Environment			
NAT1 – NAT5 Natural Heritage Policies	295 - 303	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>

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			<p>We welcome the commitment to the conservation, protection and where possible, enhancement of biodiversity in policy NAT5 including the use of The NI Biodiversity Checklist (paragraph 11.1.16) to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests. The consideration of biodiversity issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be 'built in' to a project by developers and will also assist planning authorities in considering the potential impacts of development proposals on biodiversity and natural heritage interests.</p> <p>We support the inclusion of trees and woodland as natural heritage features worthy of protection in policy NAT5, however, we would like to see more detail included on the protection and planting of trees. We note that Appendix D (page 330 & 331) sets out existing guidance in relation to Landscape Design, however, we would like to see a detailed development management policy in relation to trees and development.</p> <p>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</p>

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			<p>IQ of children. We would like policy to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.</p> <p>We welcome the reference to the Council's Local Biodiversity Action Plan; however, we consider that an opportunity exists within the dPS to proactively enhance biodiversity through the development management process. We believe that additional biodiversity can be supported by providing habitats for animals and birds, for example, through the incorporation swift nest bricks in new developments.</p>
Appendices	315-363	Support	The Housing Executive is generally supportive of the information contained in the Appendices, especially Appendix D Guidance for New Residential Development in Settlements. We would like to see these Appendices explicitly set out as Supplementary Guidance and to be given weight in the determination of planning applications.
Monitoring	N/A	Representation	We would also welcome information in relation to how the dPS will be monitored to ensure the Council's Vision and Objectives are being met.

Housing Executive Response to Mid and East Antrim Local Development Plan Draft Plan Strategy

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Prematurity			<p>The Housing Executive would like further information on how prematurity could 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.</p> <p>We believe that the dPS should be a material consideration in the determination of planning applications in Mid and East Antrim, as the extant plans (Ballymena Area Plan 1986-2001, Larne Area Plan 2010, and the Carrickfergus Area Plan 2001) and the draft Belfast Metropolitan Area Plan 2015 are now out of date and were prepared before the publication of the current Regional Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p>

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Developer Contributions			<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 would also like to see a developer contribution to help provide affordable housing. Developer contributions for affordable housing 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 Borough. 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>In addition, we believe a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.</p>
PART 1			
Setting the Context			
Setting the Context	26 - 31	Support	<p>The Lifetime Opportunities – Government’s Anti-Poverty and Social Inclusion Strategy for Northern Ireland 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>

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			<p>We believe that the housing policies within the LDP should aim to ensure that new residential developments provide adequate homes, for all in the Mid and East Antrim Borough Council area.</p> <p>The UN defines an adequate home 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>The ability for all to be housed in an adequate home is a necessary prerequisite to achieve the outcomes and strategic priorities of each theme within the Community Plan “Putting People First”.</p> <p>We believe that mixed tenure development and an adequate supply of affordable and accessible housing can help achieve sustainable, balanced and cohesive communities and contribute to a sense of belonging and a reduction in health inequalities, which help meet the objectives of the Council’s Community Plan.</p>
Plan Vision & Strategic Objectives			
Plan Vision	42	Support	<p>The Housing Executive welcomes that the LDP vision is primarily based on the vision of the MEA Community Plan as this will to encourage synergy between the two plans. We also support that LDP vision has been tailored to include an emphasis on place making.</p>

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Strategic Objectives	44-46	Support	<p>We support the Strategic Objectives, of particular importance to the Housing Executive are:</p> <ul style="list-style-type: none"> • Economic objective G <i>“To support the generation of energy, particularly from renewable sources, in a balanced way that takes due account of environmental impacts and on sensitive or vulnerable landscapes.”</i> • Social Objectives C and D <i>“To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs”</i> and <i>“To deliver quality residential environments (including associated public open space and linkages to green infrastructure networks)”</i>; and • Environmental Objective I <i>“To promote high quality design standards in all development so as to reflect local distinctiveness and further positive placemaking.”</i>
Spatial Growth Strategy and Countryside Strategy			
Spatial Growth Strategy (SGS1)	50-55	Support	<p>The Housing Executive supports the Spatial Growth Strategy, which is closely linked to the RDS Spatial Framework Guidance and the acknowledgement that this will influence the allocation of land for development and housing and the Local Policies Plan. We believe the proposed SGS will help promote sustainable development in the Council area.</p> <p>We also support the statement that housing zonings will ensure land availability over the plan period to meet housing needs. We welcome that in main towns’ residential development will be focused within the urban fabric and brownfield land, which will encourage compact urban forms and accessibility to services, and that appropriately scaled residential development, can be accommodated in villages and small settlements.</p>
	58	Support	<p>The Housing Executive generally supports the proposed settlement hierarchy and the identification of the settlements for each tier. While we understand that Portglenone does</p>

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Settlement Hierarchy (SGS2)			not have the population of 5,000 to be defined as a small town, according to the NISRA definition, we do believe that Portglenone has a level of services and facilities to be described as a small town in the RDSs Hierarchy of Settlements and Related Infrastructure. Therefore we believe that Portglenone could be treated an exceptional case, within the Spatial Framework as a village which could support further growth, beyond other villages.
Strategic Housing Allocation to Settlements (SGS3)	62	Support	The Housing Executive believes the allocation of housing to settlements is logical and takes adequate account of the Housing Evaluation Framework contained in the RDS. However, we would like to see some flexibility to the allocation figures over the plan period, especially in settlements where there is an existing or arising affordable housing need as identified by the Housing Executive's Housing Need Assessments. We believe that the proposed "plan, monitor and manage" approach can help ensure that there is sufficient housing land, including land for affordable housing, over the Plan period.
Strategic Projection of Zoned Housing Land (SGS4)	64	Support	The Housing Executive supports this policy, which will protect housing land, in order to meet housing need over the Plan period and to ensure there is adequate housing land to meet need. We understand this policy will be enacted once the PS is adopted and that extant housing zonings will be protected. However, we believe that the protection of any current housing sites, prior to LPP adoption, which do not meet the sequential test or undermine the achievement of sustainable development, may be undesirable. In these instances, we would like to see sustainable development included as a material consideration in the assessment of planning applications.
	67	Representation	The Housing Executive generally supports the management of housing supply, which includes a sequential approach and the phasing of housing land in the three main towns and Greenisland. We specifically welcome the statements in paragraphs 5.3.18 and 5.3.20 that

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Management of Housing Supply (SGS5)	75	Support	allow the allocation of additional land and Phase 1 land outside urban footprints to meet affordable housing need, as identified by the Housing Executive, where it cannot be readily met elsewhere. However, while we welcome this exception set out in point D within the Policy box under “Remaining Small Towns”, we would also like to see this set out as an additional point within the policy box for “Main towns and Greenisland”. This would make the policy box consistent with the text in paragraph 5.3.18.
Economic Development Strategy (SGS6)			The Housing Executive supports the Strategic Allocation of Land for Economic Development, which focuses economic zonings in the three main hubs. We believe that these towns will be accessible to the majority of residents in Mid and East Antrim, and are well served by public transport. We welcome opportunities for business growth within the settlement limits and would like to see a sequential approach to the allocation of employment land where land outside development limits is only considered where there are no suitable sites available in towns and villages, and is of an appropriate scale.
Retail Strategy (SGS7)	76	Support	The Housing Executive supports the retail hierarchy, and the town centre first approach. As town centres are more accessible by all forms of transport, we believe this approach will ensure local people can readily access services and facilities in a sustainable manner. We also support the designation of local centres, as this will help to define and protect their role in meeting the day-to-day needs of their surrounding hinterland.
Transport Strategy	82 & 83	Support	The Housing Executive strongly supports the Transport Objectives. We believe these will promote the integration of transport and patterns of development, which reduce the need to travel, 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 the plan

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Open Space Strategy (SGS9)	86	Support	<p>objective to reduce travel demand through integration of land-use planning and transport aligns with a key objective of the draft PfG delivery plans.</p> <p>Due to different car ownership levels for social housing, than other tenures of development (55% of social housing tenants do not have access to a car, NIHE 2018) we strongly support the promotion of public transport and active travel networks to provide accessibility and connectivity for all.</p> <p>The Housing Executive supports the intention to provide a strategic policy framework for the provision and protection of green and blue infrastructure within the Borough. We note Belfast City Council have produced a draft Green and Blue Infrastructure Strategy, an Open Space Strategy, and propose a range of new strategies and plans for Belfast on the open space typologies set out under SGS9. Therefore, while we support the SGS09 we believe there may be an opportunity for the Council to develop further comprehensive open space strategies.</p> <p>The Housing Executive believes that master planning would provide a strategic approach in the creation of new open space that forms part of a network. We believe that in strategic development sites, and in areas which are in an 'accessibility hot spot', potential open space areas could be allocated and protected within the Local Policies Plan of the LDP. The delivery of these sites could be funded by developer contributions. This would ensure a cohesive approach in the delivery of new spaces, which are not subject to a reactive and possibly piecemeal approach.</p>
	92 & 93	Representation	<p>The Housing Executive supports the policy aims to facilitate development that contributes to a sustainable rural economy and to protect and conserve the rural landscape, heritage</p>

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Countryside Strategy	93	Support	assets and the environment. However, we would like to see the policy aims expanded to allow development that also contributes to a sustainable rural community, not solely the rural economy. This would better promote sustainable development, where equal weight should be given to social, economic and environmental factors.
Special Countryside Area (CS2)	99	Support	The Housing Executive supports this policy to protect sensitive landscapes from excessive and inappropriate development. We would like to see affordable housing need met within settlement limits within these locations, as a rural exceptions policy may not be suitable within Special Countryside Areas. Therefore, we may wish to examine at the Local Policies Plan stage zoning land for affordable housing or revising the proportion for affordable housing on housing land through a Key Site Requirement. Currently, there is a social housing need in Carnlough, so we would like to see if there is an opportunity to uplift the proportion for affordable housing in this location, due to local circumstances, at LPP stage.
Rural Landscape Wedges (CS4)	100	Support	The Housing Executive supports rural landscape wedges, which can help promote compact urban forms where amenities and services are closer to the communities they serve.
Antrim Coast and Glens AONB (CS5)	102	Support	The Housing Executive supports we support this policy, which seeks to protect, conserve, and where possible enhance the scenic quality and distinctive character of the Antrim Coast and Glens AONB from inappropriate development. This will help conserve the natural beauty and landscape of the area, thereby, contributing to the well-being of local people and visitors.
			The Housing Executive welcomes this policy which will help protect the coast from unacceptable development but would allow flood defences, and development to provide public access and environmental benefit. This will assist the regeneration of coastal areas

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Developed Coast (CS6)	104	Support	and will encourage recreation leading to active lifestyles, promoting health and well-being of communities. The Housing Executive supports LLPAs that protect environmental assets. This helps enhance a sense of place and promotes quality development.
Local Landscape Policy Areas (CS7)	106	Support	We support the protection of river corridors to maintain or enhance biodiversity, water quality and to restrict development that could result in increased flooding.
Protection of Main River Corridors (CS8)	109	Support	The Housing Executive welcomes the policy to ensure safe development that minimises the risk to health and safety.
Land Instability and Coastal Erosion (CS 9)			
PART 2			
General Policy for All Development			
General Policy for All Development (GP1)	114-116	Representation	The Housing Executive welcomes this policy, which ensures quality developments that protect the environment and provide benefits to local people. The Housing Executive supports an approach where proposals will be granted planning permission where they contribute to sustainable development. Therefore, we would like to see proposals assessed with reference to the positive and negative effects they will have on economic, environmental and social factors.

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			<p>While we welcome criteria e) v., to take account of the efficient use of energy, water and other resources, we would like to see more detail added to this policy, or a new policy dedicated to climate change and resilience developed. We would like to see developers expected to demonstrate that measures to reduce energy consumption and sustainable design solutions have been considered and incorporated into their proposals.</p> <p>We also support the precautionary principle, where evidence of environmental or human health hazards is uncertain. We would like to see a restriction for development that may present a potential risk to health, protecting the public from exposures to harm; and that any adverse effects are mitigated.</p> <p>In addition, we would like to see the inclusion of Health Impact Assessments for major development. The Housing Executive 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 requirement for planning applications in GB and they can help meet the SPPS and Community Planning objective to improve health and wellbeing.</p>
Sustainable Economic Growth			
Sustainable Economic Growth	121	Representation	<p>The Housing Executive is supportive of the dPS's economic policies. However we would like to see a policy that encourages the use of social clauses, for major development to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed to 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</p>

Policy	Page	Representation / Support / Objection	Comments
Economic Development in Settlements (ECD1)	124	Support	<p>term unemployed and those leaving education and training, as a key way of delivering social elements of sustainable development”.</p> <p>The Housing Executive welcomes the policy focus on enterprise and employment growth within the main towns across the Borough. We welcome the sequential approach used to identify employment land, which directs employment to the Hubs and local towns first. 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. Therefore, we would like to see a statement which explicitly states that economic development sites that are accessible by public transport will be included in a sequential test. 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>
Retention of Economic Development Land (ECD2)	126	Support	<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 Executive supports the presumption against the alternative use of land zoned for economic development, which aligns with the RDS principle to maintain an adequate supply of employment land throughout the Plan period. We would also like to see the Policy state that 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.</p>
Development incompatible with Economic	127	Support	<p>We welcome this policy which by not permitting adjacent incompatible uses to economic development can protect residential amenity. This will ensure that local residents are not adversely affected by any industrial emissions, noise or heavy traffic.</p>

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Development Uses	128	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. This will help protect rural character.
Economic Development in the Countryside (ECD4)	132-139	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 policy within the SPPS. We welcome that paragraph 7.29.9 states that the LDP will promote diversity in the range of town centre uses, including residential use under policies HOU2 and HOU4.
Retailing and Town Centres, (RET1- RET4)	150	Representation	This policy could direct applicants to the new “Model Licence Conditions 2019”, for caravan sites, published by the Department for Infrastructure.
New and Extended Holiday Parks in the Countryside (TOU7)			
Building Sustainable Communities			
Quality in New Residential Developments (HOU1)	172	Representation	The Housing Executive supports this policy, which will aid good design and place making. We also welcome a policy, which allows for increased density where appropriate and where close to services, this will reduce the need to travel and will enable sustainable development.

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			<p>While we welcome the proposal that all new dwellings in established residential areas should be built to a size standard, set out in Appendix F, we believe these standards should be adopted for all new housing. These standards accord to social housing space standards, which ensure that homes are large enough to meet the needs of occupiers. The Royal Institute of British Architects states space in housing has a significant ongoing effect on quality of life and “A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, and exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion”.</p> <p>We also support the proposal that all residential units should be accompanied by a concept statement.</p> <p>We support the requirement for adequate open space provision in new residential developments, which is particularly important for new family dwellings. We would welcome a statement stating that open space should be in a variety of formats dependent on the type of residential units proposed. In addition, we would like to see planting of native species in housing developments encouraged, including the promotion of tree-lined streets.</p> <p>The Housing Executive believes there is an opportunity for the Policy to promote energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. We note that in England, fossil fuel boilers in new homes are being phased out by 2025, so we would like to see renewable heating sources and carbon neutral homes encouraged within the dPS.</p>

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The Conversion or Change of Use of Existing Buildings to Flats or Apartments (HOU2)	175	Support	<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 UKs legally binding climate change targets will not be met. It also states that energy use in homes, excluding heating, accounts for 14% of UK total emissions. As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive believes that new homes should be designed to be energy efficient, low carbon, water efficient, and climate resilient. A future proofed home looking holistically to meet the changed climate, and demographic and social needs, will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate the environmental impacts of housing.</p> <p>The Housing Executive supports this policy and we specifically welcome the reference to Living Over The Shops, which can help promote the regeneration of town centres.</p>
Residential Extensions and Alterations (HOU3)	176	Support	<p>The Housing Executive supports the proposed policy on extensions and alterations, which can enhance the flexibility, resilience, and endurance of a dwelling, allowing it to adapt to different users and their needs.</p>
	177	Support	<p>We strongly support increasing the supply of affordable homes through protecting town centre living areas, by including Key Site Requirements (KSRs) for affordable housing within development opportunity sites and vacant sites, and by promoting “Living Over the Shops”</p>

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Protected Town Centre Living Areas (HOU 4)	178	Support	(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.
Affordable Housing in Settlements (HOU5)			<p>We strongly support the affordable housing policy which meets the aims of the RDS, SPPS, and the LDP of providing a mix of tenures, to meet need and to create cohesive and balanced communities.</p> <p>We support the threshold of ten or more dwelling units, or on a site of 0.2 hectares, or more and the minimum 20% in towns and the 10% requirement in villages and small settlements. We believe this will address affordable housing need, while respecting the draft Plan's Spatial Growth Strategy. As there is a high level of committed housing sites, we believe that the ten unit threshold is appropriate to maximise the number of sites to which the policy can be applied.</p> <p>This policy approach will help ensure mixed tenure development and sustainable communities. This will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area based deprivation.</p>

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			<p>Currently, we support the definition of affordable housing as defined by the SPPS. We understand the number of intermediate products may be expanded in the future, following the DFC consultation on the Definition of Affordable Housing. We would like any change to the definition to include the following criteria:</p> <ul style="list-style-type: none"> • the affordable housing is delivered by a registered housing association; • the affordable housing is allocated by a housing association to eligible households who cannot access market housing; and • the affordable housing units should remain at an affordable price for future eligible households or if these restrictions are lifted, the subsidy shall be recycled for alternative affordable housing provision. <p>We welcome that it is stated that the Housing Executive has a role in the identification of need and the applicant is advised to liaise closely with a Housing Association to discuss the affordable housing requirement.</p> <p>We support the statement in paragraph 8.1.39 that in some instances there may be the potential for a higher proportion of affordable housing and that the proportion of affordable housing can be adjusted through a key site requirement within the Local Policies Plan, which will be important in areas where there is an acute housing need.</p> <p>We would support the delivery of affordable housing being secured by a Section 76 planning agreement, with conditions used on outline applications, and some small schemes only. A planning agreement can include more detail, better ensuring the units are compliant with policy.</p> <p>We would welcome some additional statements:</p>

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Housing Mix (HOU6)	180	Support	<ul style="list-style-type: none"> The development should be tenure blind and integrated with market housing. This will ensure that there is a genuine housing mix, promoting more cohesive communities; and The social housing is delivered to DFC's Housing Association Guide Standards. <p>We believe that supplementary planning guidance will help effective implementation of the policy and the development of units to meet need, and we would welcome assisting the Council in the preparation of guidance.</p> <p>The Housing Executive strongly supports this policy, which will help meet housing needs in the borough and will promote mixed tenure development to help ensure balanced communities. Well-designed neighbourhoods provide a variety and choice of homes to suit all needs and ages, this includes people who require affordable housing, families, older people, students and people with physical difficulties or mental health needs.</p>
	181	Support	<p>The Housing Executive strongly supports the policy criteria to help ensure new homes are adaptable, which will help the Council meet the SPPS and RDS requirements to meet the housing needs for all, and to promote development, which improves health and well-being. These homes will also promote social inclusion and meet the needs of people of different ages and abilities.</p>
Adaptable and Accessible Homes (HOU7)		Objection	<p>However, we would like to see a requirement for a proportion of wheelchair standard dwellings to be delivered as these units can better meet the needs of wheelchair users. 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 wheelchair accessible homes.</p>

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			<p>A proportion of social housing schemes are now required to provide wheelchair standard units, with a target of 10% to be developed by 2020/2021, therefore, we believe it is reasonable that a similar proportion is required of the private sector to help meet the needs of wheelchair users who wish to own their own homes.</p> <p>In addition, we would like to see a policy with the dPS for Supported Housing. Supported housing is for individuals who cannot live independently in their own home. They require extra housing support and/or an element of care in addition to a home. Accommodation can take the form of self-contained or shared accommodation. The term 'shared housing' is used to describe accommodation for two or more persons with shared facilities, e.g. bathroom, kitchen, communal living room or dining room. Shared housing can include clusters of dwellings, group homes or hostels.</p> <p>Supported housing need is identified, for a three-year programme, through a commissioning process with partners including the Housing Executive, the Health and Social Care Board, Health Trusts and the Probation Board.</p> <p>As Supported housing need is not projected on a long-term basis, we would recommend that a development management policy in respect of Supported housing is included within the LDP. This policy should acknowledge that Supported housing schemes should be prioritised and flexibility should be applied in the application of residential design standards due to the specific nature of supported accommodation.</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.</p>

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			<p>Therefore we believe a wheelchair standard housing requirement and a Supported Housing Policy would help promote sustainable development.</p> <p>An increased provision wheelchair units and Supported housing 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> <p>We note there is a statutory link between LDPs and Community Plans, therefore, we would like to see the LDP help achieve Mid and East Antrim Community Plan's "Putting People First" priorities:</p> <ul style="list-style-type: none"> • Our older people are active, respected and supported by their community; • Our people are able to enjoy longer and healthier lives;

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			<ul style="list-style-type: none"> • Our people feel safe in their community and have a sense of belonging to an area; and • Our borough has vibrant, shared and cohesive communities. <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 The Community Plan states that infrastructure projects being considered include housing developments and supported living to support the needs of older people and those with disabilities, to support independent living for vulnerable people, and for an aging society". We believe the Plan Strategy can have an important role to help deliver this Community Plan action.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department</p>

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Travellers' Accommodation (HOU8)	182	Support	<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.</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>We welcome this policy to ensure that Travellers' needs are adequately catered for within the LDP. There is an opportunity for the Policy to refer 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). Adherence to relevant guidance will assist in the delivery of high quality designed sites, improving living standards for Travellers, thereby improving health and wellbeing. It should be noted that the Housing Need Assessment, carried out by the Housing Executive, for Travellers, is in relation to the housing needs of Irish Travellers, only.</p>
	193	Support	<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 HOU16 will provide flexibility should need rise over the Plan period. We support the restriction that planning</p>

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Affordable Housing in the Countryside (HOU16)			permission will only be given where applications are submitted by a Housing Association but we would also welcome the inclusion of the Housing Executive within this statement. For clarification, we would like to see the Policy state that while the Housing Executive identifies affordable housing need; the onus will be upon the applicant to demonstrate there are no alternative available sites within settlement limits. The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the implementation of CTY5 of PPS 21. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when applying for planning permission under this Policy.
Open Space, Sport and Leisure			
OSL1 Protection of Open Space	194	Support / Representation	<p>The Housing Executive supports these policies to provide good quality, accessible public open space 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, helps to create a quality living environment, provides opportunities for play, helps alleviate flood risk and encourages community cohesion. It can also support wildlife and biodiversity, improve connectivity and attract investment in the Borough's economy.</p> <p>However, we recognise that 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 supports the general presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space. However, we would like to see the provision of affordable housing included as an example of a substantial community benefit. We would like to see the Justification and Amplification state that generally the community should be in support of the development and that</p>

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OSL2 Greenways	196	Support	<p>applications should demonstrate they have consulted the community, even if the development is not classified as 'major' and how community views have been taken into account. 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>The Housing Executive agrees with the policy approach (OSL2) to protect and enhance greenways across the Borough, which will form part of a multi-functional green and blue infrastructure network. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion, pollution and greenhouse gas emissions. 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, providing wildlife corridors, 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. In order to promote further the use of greenways, we believe that bike hire stations along greenways could further connect people, and encourage people to cycle, over a longer distance than walking.</p>
OSL3 New Open Space Provision, OSL4 Public Open Space in New Residential	196 - 202	Support	<p>The Housing Executive welcomes these policies in relation to the provision of public open space. We support the requirement for the provision of adequate, integral public open space in new residential developments of 25 units/1 hectare or more. We believe the provision of open space and its long-term maintenance and management is important in the creation of sustainable communities, as it is greatly beneficial to peoples' health and wellbeing and encourages community cohesion. Paragraph 8.2.11 states that 'It is important, that</p>

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Development, OSL5 Sport and Outdoor Recreation Facilities			<p>children's play areas and facilities are located within a reasonable walking distance of where they live', we would like to see a requirement that such play areas are easily accessible, to meet the needs of disabled people and that children can access them safely, for example, using pedestrian crossings. These spaces, and safe routes to them, should be explicitly planned into residential areas and town centres.</p> <p>The Housing Executive recognises that 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 welcome the reference in paragraph 8.2.11 to the potential for developer contributions to be sought for new or upgraded play facilities in the locality and note that a guidance framework on planning agreements and developer contributions will be developed by Council in the future as stated in paragraph 8.2.16.</p>

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OSL6 Community Growing Spaces and Allotments	206	Support	<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. Natural rewilding is an effective way of producing rich habitats and can recover biodiversity loss.</p> <p>We strongly support the development of Community Growing Spaces and Allotments, which can encourage healthy lifestyles and promote community cohesion.</p>
COM1 Education, Health, Community and Cultural Facilities	209	Support	<p>We support the allocation of land for education, health, community and cultural facilities within COM1. The Housing Executive supports this Policy to protect land for community and cultural facilities and public services. These services and facilities are necessary components of sustainable communities.</p> <p>In addition, we would like to see a developer contribution policy, where the uplift in land values generated by the granting of planning permission should help fund additional community infrastructure that is needed to contribute to the development of sustainable communities and their well-being.</p>
Transportation, Infrastructure and Connectivity			
TR4 Disused Transport Routes	219	Support	<p>The Housing Executive agrees with the policy aim to protect disused transport routes identified in the Plan for re-use for transport purposes, or for alternative appropriate recreational, nature conservation or tourism related uses which will deliver environmental, social or economic benefits. Policies which support active travel can improve health and wellbeing and help mitigate the effects of climate change by promoting a modal shift away from the car.</p>

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TR5 Active Travel	220	Support	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 76% of the Borough's residents travel to work by car (2011 Census figures). 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 the Transport Strategy (5.7, pages 82 and 83) and policy TR5 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 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.
TR6 Parking and Servicing	221	Representation	In relation to policy TR6, 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, (55% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).
Flood Risk and Drainage			
FRD1 – FRD6 Flooding	226 - 235	Support	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

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			not increase the risk of flooding. We support actions which can increase resilience to climate change and which are important ways to assist flood prevention. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome 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 FRD3. We support the promotion of the use of Sustainable Urban Drainage Systems, which can be used effectively to manage surface water run-off by, for example, the use of green roofs/walls, tree pits and swales, which help integrate green and blue infrastructure into the public realm/buildings and enhance nature conservation and biodiversity.
Renewable Energy			
RE1 Renewable Energy Development	238	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 and protecting health and wellbeing.
Telecommunications and Overhead Cables			
TOC1 Telecommunications Development and Overhead Cables	244	Support	We recognise that access to high-speed broadband is essential for sustainable economic development and can help reduce social isolation and provide access to services. We therefore support this policy, which aims to facilitate the development of telecommunications and utilities infrastructure in appropriate locations while minimising the environmental impact of such infrastructure.
Water and Wastewater (Sewerage) Infrastructure			

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WWI1 Development Relying on Non-Mains Wastewater Infrastructure	249	Support	The Housing Executive supports this policy, which seeks to ensure that proposals for new development relying on non-mains wastewater infrastructure, either individually or cumulatively do not increase the risk of pollution, which is in the interests of sustainable development. We support the requirement for developer contributions towards infrastructure upgrade costs to facilitate development.
Stewardship of Our Built Environment and Creating Places			
HE1 – HE9 Historic Environment Policies	263 – 283	Support	<p>We support the Historic Environment policies which aim to 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 leisure and educational value.</p> <p>We believe that underused and vacant unlisted locally important buildings or vernacular buildings have the potential to become catalysts for regeneration, through sympathetic adaptive reuse. This sustainable approach preserves important elements of identity and local distinctiveness.</p>
SFA1 Strategic Focus Areas	293	Support	The Housing Executive supports the place-making approach set out within this policy as this can lead to successful places. Place making links with urban design, as this approach 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 an area. We support the policy approach of designating distinctive urban areas as Strategic Focus Areas, in order to promote good place-making in such areas and support their successful and sustainable development. However, we would like to see a place making approach being delivered in all areas.

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Safeguarding our Natural Environment			
NAT1 – NAT5 Natural Heritage Policies	295 - 303	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 commitment to the conservation, protection and where possible, enhancement of biodiversity in policy NAT5 including the use of The NI Biodiversity Checklist (paragraph 11.1.16) to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests. The consideration of biodiversity issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be 'built in' to a project by developers and will also assist planning authorities in considering the potential impacts of development proposals on biodiversity and natural heritage interests.</p> <p>We support the inclusion of trees and woodland as natural heritage features worthy of protection in policy NAT5, however, we would like to see more detail included on the protection and planting of trees. We note that Appendix D (page 330 & 331) sets out existing guidance in relation to Landscape Design, however, we would like to see a detailed development management policy in relation to trees and development.</p> <p>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,</p>

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			<p>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 to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.</p> <p>We welcome the reference to the Council's Local Biodiversity Action Plan; however, we consider that an opportunity exists within the dPS to proactively enhance biodiversity through the development management process. We believe that additional biodiversity can be supported by providing habitats for animals and birds, for example, through the incorporation swift nest bricks in new developments.</p>
Appendices	315-363	Support	The Housing Executive is generally supportive of the information contained in the Appendices, especially Appendix D Guidance for New Residential Development in Settlements. We would like to see these Appendices explicitly set out as Supplementary Guidance and to be given weight in the determination of planning applications.
Monitoring	N/A	Representation	We would also welcome information in relation to how the dPS will be monitored to ensure the Council's Vision and Objectives are being met.