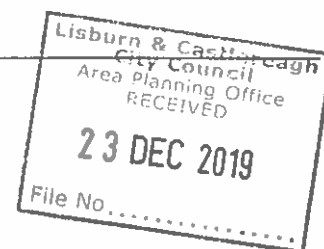


Local Development Plan Team
Civic Quarters
Lagan Valley Island
Lisburn BT27 4RL



19th December 2019

Dear Sir/Madam

The Housing Executive welcomes the publication of Lisburn and Castlereagh City 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 Lisburn and Castlereagh, to 2032. 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 Objectives:

- "Provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing" and;
- "Encourage good design and positive place-making in all development appropriate to its locality and context."

We strongly support Strategic Policy 08 "Housing in Settlements", in particular to "promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing". We also welcome the references to mixed tenure housing. We believe mixed tenure housing is important to provide cohesive, balanced and sustainable communities. In addition we welcome the operational Policy HOU 10, which by requiring a 20% proportion of affordable housing, of developments of five units or more, or 0.5 hectares or more, will help meet affordable housing need throughout the City Council Area. 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, in relation to a requirement for lifetime homes and wheelchair standard homes, we would welcome discussing this with the Council to explain our concerns 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 HOU 10 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 faithfully


Chief Executive

Housing Executive Response to Lisburn and Castlereagh Local Development Plan Draft Plan Strategy

Policy	Page	Representation / Support / Objection	Comments
Prematurity			<p>General Comments</p> <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 Lisburn and Castlereagh, as the extant plans (Belfast Urban Area Plan 2001, Lisburn Area Plan 2001, Carryduff Local Plan 1988-1993, Ballymacoss Local Plan, Lisburn Town Centre Plan and the Lagan Valley Regional Park Local Plan 2005) and the draft Belfast Metropolitan Area Plan 2015 are now out of date and were prepared before the publication of the current Regional</p>

Policy	Page	Representation / Support / Objection	Comments
Developer Contributions			<p>Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p> <p>We strongly support the introduction of Developer Contributions, within the dPS, which means that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The Housing Executive 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 Council area. 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			
Introduction			
Introduction	20	Support	<p>We welcome that in the preparation of the dPS regard has been given to 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</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>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 Lisburn and Castlereagh City 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.</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>

Policy	Page	Representation / Support / Objection	Comments
Vision and Plan Objectives			
Vision	32	Support	We support the LDP Vision, which contains a reference to sustainable development.
Plan Objectives	33 - 39	Support	<p>We support the Plan Objectives, which are set out under six themes and aligned to the Community Plan themes. We believe this will help provide synergy between the two Plans. Of particular importance to the Housing Executive are:</p> <p><u>A Quality Place</u></p> <ul style="list-style-type: none"> • Provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing; • Encourage good design and positive place-making in all development appropriate to its locality and context; <p><u>A Thriving Place</u></p> <ul style="list-style-type: none"> • Accommodate population growth to ensure a continuous supply of labour and allow the resident population the opportunity to avail of high quality employment opportunities in sustainable locations close to where they live; <p><u>A Vibrant Place</u></p> <ul style="list-style-type: none"> • Promote the regeneration of our city and town centres as quality places to live, work, shop and visit; <p><u>An Attractive Place</u></p> <ul style="list-style-type: none"> • Protect and enhance open space recognising its value in promoting health and well-being and resolving flood issues through the introduction of sustainable urban drainage infrastructure; <p><u>A Green Place</u></p> <ul style="list-style-type: none"> • Shape our places, the quality of new buildings and our town and village centres by promoting good design and maximise benefits to

Policy	Page	Representation / Support / Objection	Comments
			<p>communities; <u>A Connected Place</u></p> <ul style="list-style-type: none"> • Mitigate and adapt to climate change by minimising greenhouse gas emissions; and • Support renewable energy infrastructure whilst affording protection to the environment.
Strategic Policies and Spatial Strategy			
Strategic Policy (SP) 01 Sustainable Development	42	Support	We strongly support the statement that the LDP will facilitate sustainable development, including sustainable housing growth. 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.
SP 02 Improving Health and Well-being	42	Support	The Housing Executive supports this policy as we recognise the importance of considering health as part of the planning process, and that health impacts are considered in the formulation of development to assist better health and well-being for local people. In addition, we would like to see the inclusion of Health Impact Assessments for major development. Health Impact Assessments are often a requirement for planning applications in GB and can ensure health and well-being are considered, meeting this policy aim and the SPPS and Community Planning objective to improve health and well-being.
SP 03 Creating and Enhancing Shared Space and Quality	43	Support	The Housing Executive strongly supports this policy, which recognises housing of different house types, sizes and tenures to meet different needs promotes balanced communities. We believe a shared space policy can encourage

Policy	Page	Representation / Support / Objection	Comments
Places			community cohesion and the creation of sustainable communities, reducing the isolation of certain groups.
SP 04 Supporting Sustainable Economic Growth	43	Support	We support this policy to provide economic growth without compromising environmental standards. We believe a strong economy is vital to support sustainable communities and well-being. We also note that the quality development and environmental protection can promote attractive places where people wish to live, work and invest in.
SP 05 Good Design and Positive Place Making	44	Support	The Housing Executive supports a place making approach which links to urban design, ensuring that buildings are 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. Associated with place-making is place-management, which considers the long term maintenance and stewardship of an area, and we would like to see place-management as a factor to be taken into account in decision making.
		Objection	The Housing Executive objects to the lack of an accessible, adaptive and wheelchair standard requirement for all residential developments. We believe that "consideration" will not ensure sufficient delivery of housing to meet needs of all, as supported by the RDS and the SPPS (also see comments on page 8 of the response "Actions to deliver new homes" and under HOU 4 'Design in New Residential development on page 18).
SP 06 Protecting and Enhancing the Environment	44	Support	We welcome this policy to protect the natural environment. The natural environment is valuable to provide food, energy, flood control, clean water, clean air, aesthetics, and to support wildlife and biodiversity. Therefore, the

Policy	Page	Representation / Support / Objection	Comments
SP 07 Section 76 Planning Agreements	45	Support	<p>Housing Executive would like to see natural environment considerations is effectively mainstreamed into policy and decision making and to realise its potential in creating and maintaining high quality living places.</p> <p>We welcome the policy in relation to Section 76 planning agreements. A planning agreement can be an important element of place management, requiring the delivery of infrastructure to provide quality development, aiding a place-making approach. Planning agreements can also ensure the effective implementation of policy, including the Affordable Housing Policy.</p>
Spatial Strategy	47	Support	<p>While we would welcome more detail in the Spatial Strategy we support the identified elements.</p> <p>The Housing Executive supports a 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 Spatial Strategy should aim to promote sustainable development in the Council area.</p> <p>While we welcome the reference to allocating land for housing according to a sequential approach, we would like to see a statement that the LDP will identify housing land to ensure land availability over the plan period to meet housing needs.</p>
Settlement Hierarchy	49	Support	<p>The Housing Executive generally supports the proposed settlement hierarchy and the identification of the settlements for each tier.</p>

Policy	Page	Representation / Support / Objection	Comments
A: A Quality Place Enabling Sustainable Communities			
Actions to deliver new homes	54	Objection	<p>We would like to see an action for a requirement for all new houses designed to Lifetime Home standards and a proportion of wheelchair standard properties can help older people and people with disabilities to live independently within sustainable and balanced communities. Accessible housing can help meet the reference Community Plan outcomes:</p> <p>4B – Neighbourhoods are designed and regenerated to promote well-being. 4C – Everyone lives in an affordable home that meets their needs. 5D – We feel a sense of belonging in our local neighbourhoods: urban, suburban and rural.</p>
SP 08 Housing in Settlements	57	Support	<p>(See comments on SP 05 Good Design and Positive Place Making on page 6 and under HOU 4 'Design in New Residential development on page 18).</p> <p>The Housing Executive supports this policy, and in particular to “promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing”. We also welcome the references to mixed tenure housing. We believe mixed tenure housing is important to provide cohesive, balanced and sustainable communities.</p> <p>We would like to see a definition of affordable housing within this policy and within the Glossary, to provide certainty and to ensure genuinely affordable housing is provided to eligible households.</p>
Housing Need Assessment/	62	Representation	<p>The Plan Strategy states that the affordable housing requirement is 6,240 units over the plan period; 2017 to 2032. The Housing Executive is unsure how this</p>

Policy	Page	Representation / Support / Objection	Comments
Housing Market Analysis			figure was calculated. The Housing Executive identifies a need of 3,062 social housing units and an intermediate housing need of 1,920 units for the plan period. This equates to a total affordable housing need of 4,982 units for 2017 to 2032.
Strategic Housing Allocation	58-63	Support	<p>We support the strategic housing allocation which is generally aligned to the RDS. We support a sequential approach based on the settlement hierarchy and that the housing allocation takes account of the Housing Executive's Housing Needs Assessment, this will help ensure that sufficient land is identified to meet affordable housing need.</p> <p>In addition, the Housing Executive operates an active stock management approach to match people to accommodation, which best meets their needs. We believe that the Plan could be stronger on the need for active stock management of all housing. The additional provision of smaller units suitable for older people can help facilitate a stock management approach, by allowing older people to downsize and free up family sized units. Lisburn Planning may want to look at other cities that have been able to 'better size and fit' housing types for the changing demographic pattern.</p>
SP 09 Housing in the Countryside	66	Support	The Housing Executive supports the policy aims to facilitate sustainable housing development in the countryside that protects rural character and the environment, resists urban sprawl and allows for vibrant sustainable communities.
SP 10 Education, Health, Community and Culture	68	Support	We support this policy to protect land for the provision of education, health, community and cultural services within SP 10. These services and facilities are necessary components of sustainable and balanced communities.

Policy	Page	Representation / Support / Objection	Comments
			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 wellbeing.
B: A Thriving Place Driving Sustainable Economic Growth			
SP 11 Economic Development in Settlements	76	Support	The Housing Executive welcomes the strategic policy focus for economic development in settlements, including the proposed Strategic Mixed Use Sites at West Lisburn/Blaris and Local Employment Sites. The Housing Executive supports barrier-free employment locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. We 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.
SP 12 Economic Development in the Countryside	87	Support	We support opportunities for business growth on land outside development limits where there are no suitable sites available in towns and villages, which are of an appropriate scale and do not compromise rural character and the environment, as these are important for sustaining rural communities.
C: A Vibrant Place Growing our City, Town Centres, Retailing and Other Uses			
Strategic Policy (SP) 14	96	Support	The Housing Executive strongly welcomes these policies which promote the regeneration of our city and town centres as quality places to live, work, shop

Policy	Page	Representation / Support / Objection	Comments
Town Centres, Retailing and Other Uses			<p>and visit.</p> <p>We support a town centre first approach and the retail hierarchy in accordance with regional policy, excluding Sprucefield, which is subject to a separate policy. 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 district and local centres, as this will help to define and protect their role in meeting the day-to-day needs of their surrounding hinterland.</p> <p>We support the promotion of development proposals within city and town centres which will enhance their vitality and viability, however, we would like to see residential use referenced within the wording of the policy, as town centre living and Living Over The Shop (LOTS) can stimulate additional activity and footfall, thereby assisting regeneration.</p>
SP 15 Evening/Night-time Economy	100	Support	<p>We strongly support this policy as we recognise the importance of a thriving evening/night-time economy in contributing to the vitality and viability of city and town centres. We welcome the statement that 'The evening and night-time economy can lead to the regeneration of neighbouring areas through city centre residential living' and 'Providing a mix of uses within the city and town centres can help to grow the evening/night-time economy, create jobs and enhance the historic environment through regenerating previously unused buildings.'</p> <p>However, conversion to residential use is only appropriate where buildings can provide suitable, good quality and safe homes with adequate space standards. We would also like to ensure residential areas can avail of necessary facilities to</p>

Policy	Page	Representation / Support / Objection	Comments
SMU03 Sprucefield Regional Shopping Centre	102	Representation	<p>support high living standards and well-being, including open and amenity space, health, and education and community services. We believe that adequate and well-designed green open space is important in a high-density living environment. We also believe that environmental improvements, high quality urban design, which is pedestrian friendly, will encourage town and city centre living.</p> <p>The Housing Executive supports a town centre first approach and we would therefore like to see like the LDP to restrict further development that could harm city and town centres of Lisburn, Belfast, Craigavon, Banbridge and Newry. As this is a regional shopping centre, we believe the effects of this policy will be experienced beyond the Council area. Therefore, we would like to see an agreed policy approach to Sprucefield, with other Council areas, including Belfast, Armagh, Banbridge and Craigavon and Newry, Mourne and Down.</p>
D: An Attractive Place			
Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation			
SP 17 Open Space, Support and Outdoor Recreation	118	Support	<p>We welcome these policies, which aim to drive sustainable open space, sport and recreation within the Council area.</p> <p>We support this policy to provide good quality public open space and to protect areas of existing open space, support green and blue infrastructure and promote strategic and community greenways. We welcome the recognition within the policy of the widespread benefits of open space and sport and recreation. 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</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>encourages community cohesion. It can also support wildlife and biodiversity, improve connectivity and attract investment in the economy.</p> <p>We welcome the intention to support adequate provision and protection of a network of accessible green and blue infrastructure within the Council area. We note that Belfast City Council have recently produced a draft Green and Blue Infrastructure Strategy and an Open Space Strategy, and propose a range of new strategies and plans on different open space typologies, therefore, while we support policy SP 17, we believe there may be an opportunity for the Council to develop further comprehensive open space strategies.</p> <p>The Housing Executive agrees with the policy approach to support and promote the development of strategic greenways across the Council area, which will re-establish links between the countryside and urban areas of open space to create a network of urban open spaces. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion, pollution and greenhouse gas emissions.</p>
<p>E: A Green Place</p>			
<p>Protecting and Enhancing the Historic and Natural Environment</p>			
<p>SP 18 Protecting and Enhancing the Historic Environment and Archaeological Remains</p>	<p>124</p>	<p>Support</p>	<p>The Housing Executive welcomes these policies which will protect and enhance the historic environment within the Council area. 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. We welcome the statement that 'New development proposals should be of a high quality design in order to promote the Council area as an attractive place to live, work and invest.'</p>

Policy	Page	Representation / Support / Objection	Comments
SP 19 Protecting and Enhancing Natural Heritage	127	Support	<p>We welcome this policy to protect and enhance natural heritage, which is in accordance with regional and local policy and aims to balance growth with the protection and enhancement of key assets. Our natural heritage assets 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 support the recognition that trees and woodland contribute significantly to the natural environment and green and blue infrastructure networks and have a number of important benefits to both the environment and society. We would welcome a detailed development management policy in relation to trees and development.</p>
F: A Connected Place			
Supporting Sustainable Transport and Other Infrastructure			
SP 20 Transportation Infrastructure	139	Support	<p>We strongly support the actions to promote sustainable transport and other infrastructure within the Council area, such as active travel, park and ride/park and share facilities, and strategic greenways and disused transport routes.</p> <p>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 the 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) we</p>

Policy	Page	Representation / Support / Objection	Comments
			strongly support the promotion of public transport and active travel networks to provide accessibility and connectivity for all.
SP 21 Renewable Energy	146	Support	The Housing Executive supports this policy which aims to balance the economic/environmental benefits of renewable energy generating facilities with the need to minimise any adverse impacts on people and the environment. 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.
SP 22 Telecommunications and Other Utilities	149	Support	We support this policy, which aims to facilitate the delivery of sustainable telecommunications and other utilities infrastructure requirements, whilst minimising any visual intrusion and environmental impacts. We recognise that access to high-speed broadband/mobile technologies is essential for sustainable economic development and can help reduce social isolation and provide access to services. We welcome that the issue of capacity of existing Wastewater Treatment Works across the Council area has been acknowledged as an issue which requires a collaborative approach between NI Water and the Council to ensure that the needs of the community and economy can be met.
SP 24 Flooding	156	Support	Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. We welcome this strategic policy that

Policy	Page	Representation / Support / Objection	Comments
			<p>seeks to ensure that development proposals are adequately mitigated to reduce the potential of flooding. We support actions which can increase resilience to climate change and which are important ways to assist flood prevention, such as Sustainable Urban Drainage Systems (SUDs). SUDs 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. We also support that the precautionary approach taken in PPS 15 is included within the dPS.</p>
Monitoring and Review			
Monitoring and Review	175	Support	<p>We welcome this information in relation to how the dPS will be monitored to ensure the LDP's Objectives are being met. In particular, we welcome the inclusion of Affordable Housing and Traveller and Specialist Accommodation indicators in Appendix E, however, we would also like to see the number of Wheelchair Properties and Lifetime Homes approved included as indicators, and the number of planning permissions issued for dwellings with Integrated Renewable Energy technology.</p>
Glossary	160	Representation	<p>We would like to see Affordable Housing and Specialised Housing defined in the glossary, as these are referred to within Part 1 of the dPS.</p>

Policy	Page	Representation / Support / Objection	Comments
PART 2			
A: A Quality Place Enabling Sustainable Communities			
HOU 1 New Residential Development	12	Support	The Housing Executive supports this policy, which operates a presumption in favour of housing within settlements on land zoned for residential use, on brownfield land, in city, town centres, villages and small settlements and LOTS schemes within designated city and town centres, or as part of mixed use development. We strongly welcome the reference to LOTS, as Town Centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration and contributing to vitality and viability, as well as reducing the need to travel due to its central location.
HOU 2 Protection of Land Zoned for Housing	12	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.
HOU 3 Site Context and Characteristics of New Residential Development	13	Support	<p>The Housing Executive supports this policy, which will aid good design and place making, by respecting the existing site context and characteristics, 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.</p> <p>We agree that consideration of the individual and cumulative effects of development should be taken into account in the determination of planning applications. We also believe that there is opportunity to include a statement stating that limited weight will be given to precedence.</p>

<p>While we welcome the proposal that new residential development in areas of distinctive character, including Conservation Areas and Areas of Townscape or Village Character, should be built to a size standard, in accordance with published DfC guidance, we would like it clarified in HOU 3 that these standards should be adopted for all new housing, as per HOU 4.</p> <p>We also support the proposal that all residential units should be accompanied by an overall design concept in accordance with policy HOU 6.</p>			
<p>We are supportive of this policy which will ensure that new residential development is of high quality design.</p> <p>While we sport the policy criteria which encourages the development of homes are that are adaptable, we would like to see explicit statements that all new homes should be required to be developed to Lifetime Home standards and that a proportion of new homes should be wheelchair standard. This would 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> <p>Lifetime Homes support the changing needs of individuals and families at different stages of life, through the incorporation of 16 design criteria that can be universally applied to new homes at minimal cost.</p> <p>Currently, demand from people with a disability who wish to own their own homes cannot readily be met, as there is no requirement for market housing to provide Lifetime Homes or wheelchair accessible homes. Accessible housing will allow older and disabled people to feel safe and secure, and to be fully</p>	<p>Support</p> <p>Objection</p>	<p>14</p>	<p>HOU 4 Design in New Residential Development</p>

integrated within the community. This is especially important in an aging society.

We believe accessible housing policies can help achieve regional policy objectives. One of the eight aims of the RDS is to “Promote development which improves the health and well-being of communities”. Regional guidance also aims to strengthen community cohesion by encouraging mixed housing development to allow heterogeneous populations to live together, reducing social isolation, and creating a sense of belonging to everyone.

The SPSS identifies an important factor of sustainable development, in relation to the needs and aspirations of our society, is to facilitate sustainable housing growth in response to changing housing need and to progress policies, plans and proposals that can improve the health and wellbeing of local communities, helping to build a strong and shared society. The SPSS contains five core-planning principles, one of which is “Improving Health and Wellbeing”, which states that when plan making and decision-making, planning authorities should contribute positively to health and wellbeing. This includes providing for safe and secure age-friendly environments, and by supporting the delivery of homes to meet the full range of housing needs. This core principle also acknowledges how a building can be designed to have a positive impact on how people feel. The core principle to Create and Enhance Shared Space recognises that offering a variety of house types, sizes, and tenures will help meet the diverse needs of the community and provide opportunities for shared and balanced communities. An additional core principle Supporting Good Design and Wellbeing states that “good design can change lives... for the better”; and can promote healthier living, accessibility, and inclusivity.

An increased provision of Lifetime Homes and wheelchair units can contribute to

	<p>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>The Lisburn and Castlereagh Community Plan contains outcomes including "Older people age actively and more independently to stay well and Connected" and "Our home environments are safe and healthy". These outcomes are supported by the Community Plan Action Plans which aim to Identify housing need and consider policy initiatives to address building standards and accessibility in order provide housing which is appropriate for the needs of older people and those with mobility and disability issues.</p> <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</p>		
--	--	--	--

	<p>“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 contains outcomes and actions to address building standards and accessibility to provide housing, which is appropriate for the needs of older people and those with mobility and disability issues.</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. It also states that sites or areas within settlements should be identified within the LDP, where a site or part of a site is required to meet one or more category of need.</p> <p>C4: Has the plan had regard to other relevant plans, policies and strategies relating to the council’s district or to any adjoining councils’ district The draft Programme for Government’s Delivery Plan, indicators state</p>

		<p>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>Support</p>	<p>We welcome the design criteria in relation to landscaping and private open space, especially the need for in-curtilage open space, which is particularly important for new family dwellings. We welcome the requirement for a hierarchy of different types of planting including street trees, and the requirement for permeable paving and sustainable drainage to be used. SUDs can be used effectively to manage surface water run-off by and enhance nature conservation and biodiversity.</p> <p>We welcome the requirement for supplementary replacement planning, where trees are lost due to the development proposal. However, we also note that increasing numbers of applicants are removing trees before submitting a planning application. In these instances, where trees have been recently removed we would like to see conditions attached to planning permission also requiring supplementary tree planting.</p>
	<p>Support</p>	<p>We also welcome criteria, which allows for increased density in Lisburn City and town centres, where appropriate and where close to services, this will reduce the need to travel and will enable sustainable development.</p>
	<p>Support</p>	<p>As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive strongly welcomes the promotion of energy efficient homes and buildings that can easily incorporate small-scale renewable energy technologies. We note that in England, fossil fuel boilers in new homes are being phased out</p>

		<p>by 2025; therefore the publication of the dPS is a timely opportunity to encourage the incorporation of renewable heating sources and carbon neutral homes. Therefore, we would like to see a requirement for developers to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals. We also note the Community Plan outcome “Greenhouse gas emissions are reduced.”</p> <p>Support</p> <p>We support the requirement for the layout of new housing developments to allow safe access through the provision of walking and cycling infrastructure, which meets the needs of mobility impaired persons. The Housing Executive welcomes the promotion of sustainable movement patterns and active travel accessibility and the encouragement of a modal shift away from car use towards more sustainable and active transport choices. 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. 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. We strongly welcome the inclusion of 20 mph speed limits applied to all access roads within developments and sub 10 mph ‘Home Zones’ on minor access roads.</p> <p>Representation</p> <p>We would like some flexibility on parking standards for social housing schemes</p>
--	--	---

		Support	<p>due to lower car ownership levels for social housing, than other tenures of development, as referenced in our response to policies TRA 7 and TRA 8.</p> <p>We strongly support the requirement for development to be designed to deter crime and promote personal safety, and welcome the reference to 'Secured by Design'. Designing out crime, for example through the encouragement of natural surveillance, 'eyes on the street', results in safer streets and public areas for the people who use them. Criminal activity is deterred; drivers become more considerate of pedestrians; children can find opportunities to play in the street.</p>
HOU 5 Public Open Space in New Residential Development	19	Support	<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>We support the requirement for adequate open space provision in new residential developments, which is particularly important for new family dwellings.</p>
HOU 6 Design Concept Statements, Concept Masterplans and Comprehensive	20	Support	<p>The Housing Executive supports the requirement for Design Concept Statements and Concept Masterplans to be submitted as part of a planning application for residential development. We believe this; will help achieve a place making approach. We also believe the use of Planning Agreements can support the effective implementation with policy, can ensure the delivery of necessary infrastructure, thereby providing place management.</p>

Planning				
HOU 7 Residential Extensions and Alterations	22	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.	
HOU 8 Protecting Local Character, Environmental Quality and Residential Amenities in Established Residential Areas	24	Support	The Housing Executive supports the protection of quality environments and distinctive patterns of development and character, which help provide a sense of place of an area.	
HOU 9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments	24	Support	<p>The Housing Executive believes HOU 9 will promote choice, to meet a range of need, and therefore the creation of balanced communities. We believe that the character of the local area may also be a factor in the determination of a housing mix.</p> <p>We also believe that an active stock management approach, which can ensure the effective use of existing housing stock, will require sufficient house types, form and size to accommodate a variety of household needs across age and health requirements.</p>	
HOU 10 Affordable Housing in Settlements	25	Support	<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 five or more dwelling units, or on a site of 0.5 hectares, or more and the proportion of a minimum 20% requirement of the housing units to be affordable housing. We believe this will address affordable</p>	

<p>housing need. As there is a high level of committed housing sites, we believe that the five unit threshold is appropriate to maximise the number of sites to which the policy can be applied.</p>	<p>We support the delivery of affordable housing being secured by a Section 76 planning agreement. A planning agreement can include more detail, better ensuring the units are compliant with policy.</p>	<p>We welcome a tenure blind approach to ensure the integration of market and affordable housing. This policy approach will help ensure mixed tenure development and sustainable communities.</p>	<p>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>We support the criteria that by exception affordable housing may be permitted on open space. 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. We welcome the recognition that the provision of affordable housing is an example of a substantial community benefit.</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</p>
--	---	---	--	---	--

<p>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 that affordable housing will be provided as part of the Local Policies Plan. We would like the opportunity, in some instances to adjust, or increase the proportion of affordable housing through a key site requirement within the LPP, which will be important in areas where there is an acute housing need.</p> <p>We would like to see the policy also state that the social housing is delivered to DFC's Housing Association Guide Standards.</p> <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>HOU 11 Specialist Accommodation</p> <p>27</p> <p>Support</p>
---	--	---

<p>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 support this development management policy in respect of specialist housing is included within the LDP. We would like to see the Policy recognise that flexibility may need applied in the application of residential design standards due to the specific nature of specialist accommodation.</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>	<p>Support</p>	<p>27</p> <p>HOU 12 Accommodation for the Travelling Community</p>

<p>CF 01 Necessary Community Facilities in Settlements and CF 02 Protection of a Local Community Facility</p>	<p>29</p>	<p>Support</p>	<p>We support the allocation and protection of land for education, health, community and cultural facilities within CF 01 and CF 02. The Housing Executive supports these Policies 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>
<p>COU 1 – COU16 Development in the Countryside</p>	<p>31-42</p>	<p>Support</p>	<p>The Housing Executive supports these Policy aims to facilitate development that contributes to a sustainable rural community and economy, while protecting and conserving the rural landscape, heritage assets and the environment.</p>
<p>COU 5 Affordable Housing</p>	<p>34</p>	<p>Support</p>	<p>We welcome the retention of a rural exceptions policy where a need has been identified by the Housing Executive. While the Housing Executive prefers affordable housing to be delivered through planned development, the inclusion of policy COU 5 will provide flexibility should need rise over the Plan period. 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.</p> <p>However, we would like to see a restriction that planning permission will only be given where applications are submitted by a Housing Association or the Housing Executive.</p>

B: A Thriving Place

Driving Sustainable Economic Growth

ED 1 Economic Development in Cities and Towns	44	Support	<p>The Housing Executive welcomes the policy focus on enterprise and employment growth within urban areas 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>
ED 2 – ED 6 Economic Development in Rural Areas	45 - 48	Support	<p>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.</p>
ED 7 Retention of Zoned Land and Economic Development	48	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>
ED 8 Development	49	Support	<p>We welcome this policy which by not permitting adjacent incompatible uses to</p>

<p>Incompatible with Economic Development Uses</p>		<p>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>
<p>ED 9 General Criteria for Economic Development</p>	<p>49</p> <p>Representation</p>	<p>While we support ED 9, 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>
<p>C: A Vibrant Place</p> <p>Growing our City, Town Centres, Retailing and Other Uses</p>		
<p>TC 1 TC 6 Town Centres, Retailing and Other Uses</p>	<p>56 - 59</p> <p>Support</p>	<p>We strongly welcome these policies which promote the regeneration of our city and town centres as quality places to live, work, shop and visit. We support the town centre-first approach advocated in policy TC 1 to help ensure that town centres are vibrant, mixed-use areas, which reflects policy within the SPPS. We would like to see housing specified as an acceptable use in town centres as this can help promote the vitality and viability of centres.</p> <p>We support the Primary Retail Core and Retail Frontage set out in policy TC 2, however, we would like to see specific reference to residential use, such as LOTS, where it is stated ‘planning permission for non-retail uses will be</p>

			<p>permitted on upper floors.' 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.</p> <p>We support policy TC3 Town Centres; however, we would also like to see residential use promoted within existing town centres as well as retail, leisure and business uses. Diversity of uses in town centres, including residential, will help enhance their vitality and viability.</p>
D: An Attractive Place			
Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation			
Policy	Page	Representation / Support / Objection	Comments
OS 1 Protection of Open Space	68	Support	<p>The Housing Executive strongly supports this policy 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 economy.</p> <p>The Housing Executive supports the policy 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 outweigh the loss of the open space. We strongly welcome the inclusion of the provision of affordable housing in accordance with HOU 10 included as an example of a substantial community benefit. We support that this example of an exception to the policy is restricted to a Housing Association but we would also welcome the inclusion of the Housing Executive within this statement.</p>

			<p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the operation of the open space exception policy in PPS 8. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p>
<p>E: A Green Place</p>			
<p>Protecting and enhancing the historic and natural environment</p>			
HE 1 – HE 14 Historic Environment and Archaeology	74 - 84	Support	<p>We support the Historic Environment and Archaeology 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 welcome policy HE 13 The Conversion and Reuse of Non-Listed Buildings as 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>
NH 1 –NH 6 Natural Heritage	85 - 89	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 Council’s commitment to the precautionary principle when determining the impacts of development on natural heritage resources, and support the use of The NI Biodiversity Checklist as recommended in the Natural Heritage policies, to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests. The consideration</p>

<p>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. We believe that additional biodiversity can be proactively enhanced through the development management process, for example, by providing habitats for animals and birds, such as the incorporation of swift nest bricks in new developments.</p>		
<p>We support the inclusion of trees and woodland as natural heritage features worthy of protection in policy NH 5, however, we would like to see more detail included on the protection and planting of trees. We welcome that policy HOU 4 includes landscaping criteria and SP 19 recognises the contribution of trees and woodland to the natural environment as well as benefits to both the environment and society, however, we believe that a detailed development management policy in relation to trees and development would be beneficial.</p>	<p>Representation</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 the wellbeing of people and raise the IQ of children. We would like policy to</p>		

			encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.
F: A Connected Place			
Supporting Transport and Other Infrastructure			
TRA 1 Creating an Accessible Environment	92	Support	The Housing Executive strongly supports the policy criteria to ensure that accessibility is integrated into the design of development proposals, as this will help promote social inclusion and meet the needs of people of different ages and abilities.
TRA 5 Strategic Greenways and Disused Transport Routes	95	Support	We strongly agree with the policy aim to protect disused transport routes identified in the Plan for reuse for transport or recreational purposes. 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. 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.
TRA 7 Car Parking and Servicing Arrangements in New Developments	95	Representation	In relation to policy TRA 7, 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%).
TRA 8 Active Travel Networks and Infrastructure	97	Support	We welcome the actions to promote active travel networks and infrastructure provision within the Council area, as these will help reduce the use of private cars and travel times. Due to lower car ownership levels for social housing, than other tenures of

Provision			development, we strongly support the promotion of public transport and active travel networks to provide accessibility and connectivity for all.
TRA 9 Park and Ride/Park and Share Car Parks	98	Support	We support this policy as Park and Ride/Park and Share Car Parks will help to contribute towards a reduction in car use and greenhouse gases, as well as the promotion of healthy lifestyles, which are key aims in the SPPS, a reduction in car use can also lead to communities that are more cohesive.
RE 1 Renewable Energy Development	100	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.
RE 2 Integrated Renewable Energy	101	Representation	<p>The Housing Executive welcomes this policy and supports a “fabric-first” approach to energy efficiency in new development, which can help alleviate fuel poverty and deliver quality, sustainable housing. It is stated that “The Council will encourage greater integration of renewable energy technologies, both in the design of new buildings and through the appropriate retrofitting of such technologies to existing buildings.” We believe that developers should be expected to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals.</p> <p>The Committee of Climate Changes Mitigation and Adaptation’s report “UK housing fit for the future?”, published in February 2019, states without a near elimination of greenhouse gas emissions from UK buildings, the UK’s legally binding climate change targets will not be met. It also states that energy use in homes, 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</p>

			social needs, will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate the environmental impacts of housing.
TEL 1 Telecommunications Development	102	Support	We support this policy, which aims to facilitate the delivery of telecommunications whilst minimising their visual and environmental impact.
UT 1 Utilities	104	Support	The Housing Executive supports this policy which intends to control the siting of utility services infrastructure and minimise its visual impact.
FLD 1 – FLD 5 Flooding Policies	110 - 116	Support	We welcome these policies which provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome the promotion of the use of Sustainable Urban Drainage Systems in policies FLD 3 and 4 and the need for drainage assessments to be provided for certain developments as required by FLD 3, as these are important ways to assist flood prevention.
Glossary	119	Representation	We would like to see Affordable Housing defined in accordance with the SPPS, rather than a shortened version and we would like to see reference made to the ongoing consultation by DfC on the revised Definition of Affordable Housing, which may change. We welcome the inclusion of Lifetime Homes within the glossary, however, we would also like to see Specialised Housing included.