



Local Development Plan Team
Ards and North Down Borough Council
2 Church Street,
Newtownards,
BT23 4AP

28th November 2025

Dear Local Development Plan Team

Ref: NIHE Response to Draft Plan Strategy Representation

The Housing Executive welcomes the publication of Ards and North Down Borough Council Local Development Plan (LDP) draft Plan Strategy (dPS). The Housing Executive enjoys a close working relationship with the Council; we are statutory partners in Community Planning and Statutory Consultees in the Local Development Plan and Development Management processes.

As a Statutory Consultee we welcome working with the Council on the preparation of the draft Plan Strategy. This engagement means that we support, the Vision and Strategic Objectives and Policies contained within the dPS and believe these will provide a positive direction for the development and growth of Ards and North Down, and the dPS will be central to promoting sustainable development, balanced communities and place making.

We believe that the Local Development Plan will play a key role to help achieve the Programme for Government priority to 'Provide More Social, Affordable and Sustainable Housing' and to meet the objectives contained in the Housing Supply Strategy to deliver 100,000 new homes including 33,000 social homes across Northern Ireland to 2039. The Housing Executive as the Strategic Housing Authority for Northern Ireland has a primary interest in housing strategy and policy and during 2024/25 with public sector housing investment totalled £63.50m for Ards and North Borough Council. However, we believe housing is cross cutting and has influence on, and is influenced by, economic, environmental and social issues, therefore, the Housing Executive submits comprehensive responses to draft Plan Strategies.

The Housing Executive delivers investment for a wide range of services, we are the Home Energy Conservation Authority, and we have interests in energy and renewable energy policy. To support the provision of sustainable communities, the Housing Executive undertakes significant regeneration work, often in partnership with the Council, government agencies and local communities. Regeneration in Ards and North Down Borough Council has been supported by the Housing Executive's work in Community Planning and through our policies and strategies, and by allocating funding, for Social Enterprise, Good Relations, Community Involvement, Community Cohesion, and Community Safety. We also have a Rural Strategy and Action Plan and a Sustainability Strategy.

As the draft Plan Strategy is an important document, it will be subject to an Independent Examination and is a material consideration in planning decisions, the Housing Executive wishes to demonstrate support to draft Plan Strategy Policies that can further enable sustainable development.

We support the Plan Objectives, in particular the Social Objectives:

- To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.
- To create sustainable residential environments which are designed to a high standard, well connected and inclusive of the needs of all potential inhabitants.
- To support rural communities by providing appropriate and sustainable opportunities for development in the countryside.
- To build sustainable resilient communities where people have good access to housing, employment, shops, public transport, active travel, healthcare, community and cultural facilities.
- To improve health and wellbeing - by facilitating health, education, community and cultural facilities in accessible locations and creating places that encourage a healthy lifestyle through the provision of high-quality open space and sporting facilities, informal leisure spaces and increase opportunities to walk, wheel, or cycle.

We also welcome Policies HOU 3 and HOU 12 which can facilitate the delivery of affordable housing to help address housing needs, including for those in housing stress. We support HOU 3 which states at least 20% affordable housing will be required on sites of 5 or more housing units or on a site of 0.1 hectares or more. We believe this will help address affordable 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.

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.

We welcome the retention of a rural exceptions policy, HOU 12, where a need has been identified by the Housing Executive. While we prefer affordable housing to be delivered through planned development, the inclusion of policy HOU 12 will provide flexibility should need rise over the Plan period.

As the Housing Executive wishes to respond fully to the draft Plan Strategy and while we understand an eight-week consultation for a draft Plan Strategy, is a legislative requirement, we welcomed the a “soft launch” providing additional time to scrutinise the draft Plan in sufficient detail.

As we strongly support the Policies within the dPS, and we would like to attend the Public Hearing as part of the Independent Examination to present evidence and information associated with our representation.

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

Yours sincerely,

A solid black rectangular box used to redact the signature of Grainia Long.

Grainia Long

Chief Executive



Via email: planning@ardsandnorthdown.gov.uk

LDP: draft Plan Strategy (DPS)
Ards and North Down Borough Council
LDP Team
2 Church Street
Newtownards
BT23 4AP

X January 2026

Dear Sir/Madam,

**Re: Ards and North Down Borough Council Local Development Plan 2032
Reconsultation on the draft Plan Strategy (DPS)**

Thank you for opportunity to respond to the Council's reconsultation on the draft Plan Strategy which has taken place to comply with legislative requirements, due to an administrative error, in relation to the date of a public advertisement placement.

The Housing Executive's response dated 28/11/25 remains relevant and we have nothing additional to add (please see our attached response and letter as previously submitted). We reiterate our support for the draft Plan Strategy Vision, Strategic Objectives and Policies and believe these will provide a positive direction for the development and growth of Ards and North Down Borough, and the draft Plan Strategy will be central to promoting sustainable development, balanced communities and place making.

I trust this information is of assistance.

Yours faithfully

Ailbhe Hickey

Assistant Director of Land & Regeneration (A)

Housing Executive Response to Ards and North Down Borough Council's Local Development Plan, Draft Plan Strategy

Part A – Setting the Context			
Policy	Page / Paragraph	Support / Objection	Comments
Policy Context	29-37	n/a	<p>The NI Executive agreed the Programme for Government 2024-2027 'Our Plan: Doing What Matters Most' in February 2025. We believe that the Plan Strategy could clarify that the priorities of the new Programme for Government (PfG) will be considered and will be given primacy over the May 2016 PfG. We welcome the reference to the development of and investment in new social and intermediate housing and the recognition of housing as a specific priority in the PfG. We believe that the reference to NDNA in paragraph 1.38 could be removed as this was a deal to restore devolved government in Northern Ireland published in 2020 and the current PfG is more relevant as it sets out the Executive's priorities from 2024 – 2027.</p> <p>The Housing Executive would like to see the inclusion of DFC's Housing Supply Strategy 2024-2039 included as a policy context. This was published after approval from the NI Executive in December 2024 and sets direction and actions to increase housing supply and affordable housing supply, in particular. A key component of the Housing Supply Strategy includes considering "options around mixed tenure, place-shaping and the role of Local Development Plans in achieving this".</p> <p>Paragraph 1.47 references Lifetime Opportunities - Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland. This strategy is now out of date and was last monitored in 2015. We</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>would like to see an adopted Plan Strategy give regard to the NI Executive’s Anti-Poverty Strategy 2025-2035, which is currently in draft form.</p> <p>We also note that although, not adopted at the time of preparation the policy context could be updated by referencing new draft strategic documents including:</p> <ul style="list-style-type: none"> • Shaping Sustainable Places, • Northern Ireland’s draft Climate Action Plan 2023-2027, • A draft Fuel Poverty Strategy (December 2024, will replace the extant Warmer Healthier Homes - a new Fuel Poverty Strategy for Northern Ireland 2011), • A Draft Circular Economy Strategy for Northern Ireland, • DfI’s consultation on an Active Travel Delivery Plan (November 2024), • A draft Transport Strategy to 2035, • The Eastern Transport Plan (ETP) 2035, • DfI’s consultation on Sustainable Drainage Systems (SuDS) in New Housing Developments’, • Living with Water, • Draft Green Growth Strategy for Northern Ireland, and • Northern Ireland’s draft Climate Action Plan 2023-2027.
LDP Vision	52	Support	<p>The Housing Executive generally supports the LDP Vision. We acknowledge this vision is shared with the Council’s Community Plan however, as a planning document and that a key purpose of planning is to further sustainable development, we believe that a vision for the LDP could provide stronger reference to the environment and climate change. We note that protecting and enhancing the environment is a key principle of sustainable development and paragraph 2.1 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) states that Planning authorities should ‘simultaneously pursue social and economic priorities alongside the careful management of our built and natural environment.’</p>

Policy	Page / Paragraph	Support / Objection	Comments
			As tackling climate change is a legal requirement and a key challenge which could negatively affect people and communities, the economy and environment of the Borough, we believe the vision could include a reference to mitigating, adapting to and minimising climate change, as referenced in paragraph 1.120. For example, "Ards and North Down is a vibrant, connected, healthy, safe, climate resilient, and prosperous place to live with a quality, sustainable environment'.
LDP Strategic Objectives	53 - 55	Support	We welcome the LDP Strategic Objectives, many of which are aligned to the Housing Executive's high-level objectives. We particularly welcome the Social Objectives which include to provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.
PART B - Strategic Approach			
2 Growth Strategy			
SGS 1 Spatial Growth Strategy	59	Support	<p>The Housing Executive agrees the Spatial Growth Strategy should focus growth on the main hubs, Bangor and Newtownards with balanced growth in local and small towns, while sustaining rural settlements. We believe this can promote sustainable patterns of development and enable alignment of housing use with employment, facilities and services to provide connectivity and accessibility.</p> <p>We support a sequential town centre first approach for retailing and commercial leisure, to help maintain the vitality and viability of our centres. We support that new residential development will be accommodated within the existing urban fabric, and where possible on previously developed land and would like to see town centre living referred to as an appropriate residential location.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			We welcome a phasing approach to the release of housing land to ensure supply over the Plan period and that consideration can be given to releasing land to accommodate affordable housing should needs increase at an earlier stage (Policy SGS 6)
SGS 2 Settlement Hierarchy	62	Support	<p>The Housing Executive supports the settlement hierarchy and the new designation of Portaferry as a small town. We believe the level of services and population are in line with the Regional Development Strategy's (RDS) Hierarchy of Settlements and Related Infrastructure Wheel.</p> <p>It should be noted that high levels of housing stress are experienced in the villages of Groomsport and Ballygowan. While we accept that the village designation is appropriate, it will be important to consider zoning/land allocation for these areas within the Local Policies Plan to ensure that there are adequate opportunities for growth over the Plan period.</p>
Strategic Allocation of Economic Development / Industrial Land SGS 3: Strategic Allocation of Economic and Industrial Development Land	64	Support	We support the employment land allocation which promotes employment in a range of locations and to help address deprivation. We welcome the promotion of growth directed to the principal settlements and accessible locations which can promote employment opportunities for all.
SGS4 Strategic Housing Allocations	72	Support	<p>We welcome the proposed allocation of new homes in the Borough to meet housing need.</p> <p>We note paragraph 2.43 states the allocation was informed by the SPPS and includes consideration of the Housing Executive's Housing Market Analysis (HMA), now named "15 Year Housing Market Analysis". The 15 Year HMA is an important evidence base for the Plan Strategy as it provides a tenure breakdown of the overall housing need into market, intermediate and social over the Plan period and the new dwelling requirement includes a backlog component of existing unmet need.</p>

Policy	Page / Paragraph	Support / Objection	Comments
SGS 5: Strategic Housing Allocation across settlements	77	Support	We support the proposed housing allocations across the Borough.
SGS 6: Management of Housing Land Release	79	Support	<p>We support that land zoned in Phase 1 can meet the identified housing need. However, should need increase over the Plan period, we welcome that phase 2 housing lands may be released to meet “an extreme and localised housing need”. This flexibility will help provide households with secure housing to protect and enhance health and wellbeing, should need increase across the Plan period.</p> <p>The Housing Executive can provide need figures for supported housing and Traveller's accommodation. Other specialist housing is provided by the private sector, and applicants will need to demonstrate market demand. The Housing Executive will not comment on the need for these units.</p>
3 Countryside Strategy			
Policy CS 1 Sustainable Development in the Countryside	83	Support	The Housing Executive welcomes the inclusion of affordable housing and Travellers' accommodation as acceptable developments that can be located in the countryside, should a need be identified.
Policy CS 2 Rural Landscape Wedges	85	Support	We support the use of rural landscape wedges to minimise urban sprawl, promote compact urban forms and protect the sense of place.

Policy	Page / Paragraph	Support / Objection	Comments
Policies CS 3 & CS 4	86	Support	We welcome the protection of areas that provide environmental value, and features that are of local significance, fostering local identity. We support policies that aim to preserve sensitive landscapes and visual amenity from excessive and inappropriate development.
Policies CS 5 - CS 7	89	Support	The Housing Executive supports these policies to promote sensitive design and development which respects rural character, landscapes, nature and restricts urban sprawl. Compact urban forms provide amenities and services that are closer to the communities they serve.
4 Climate Change Adaptation and Mitigation Strategy			
Strategic Policy CC 1: Climate Change Adaptation and Mitigation	100	Support	<p>We welcome the Council's climate change adaptation and mitigation strategy and focus on sustainability in the context of the Climate Change Act (Northern Ireland) 2022, the climate emergency and its wide ranging local and global implications. The Housing Executive also shares similar priorities as set out in our Corporate Sustainable Development Strategy and Action Plan which includes a framework for helping tackle the climate emergency, outlining our commitment to sustaining our environment for future generations and providing quality, affordable housing.</p> <p>We welcome policy which supports sustainable development that seeks to mitigate and adapt to climate change and increase local environmental resilience. We support the actions, in particular supporting renewable and decentralised energy generation, storage and supply, the use of low/zero carbon energy, increased energy efficiency, climate resilience and sustainable design and construction techniques in new development. We welcome actions to encourage sustainable patterns of development and improved integration of land use and transport, protection and enhancement of open space and green and blue infrastructure, active travel and sustainable transport. We welcome maximising carbon storage through protection of the natural environment, supporting the provision or restoration of biodiversity and habitats that provide a carbon storage</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>function, minimising embodied carbon, supporting waste reduction, managing flood risk and encouraging sustainable drainage systems and features in all developments.</p> <p>We would like to see reference to a circular economy, opportunities for developments to provide biodiversity net gain and the need to increase tree planting to assist with carbon sequestration, slow surface water run-off, improve air and soil quality, reduce urban temperatures and assist with biodiversity. We note that embodied carbon principles can be applicable to all built development, not only re-use of existing buildings, therefore minimising embodied carbon emissions from construction and the use of a building over its lifetime, including its demolition and disposal. The use of Property Flood Resilience (PFR) measures could be included in the action to manage flood risk, these are simple, low-cost, proven interventions to help resist surface water flooding and significantly reduce the amount of time and cost of recovering from a flood. We would also like to see other green features included within the action to facilitate and enhance green and blue infrastructure such as green roofs, walls and SuDS which have multiple benefits to improve climate resilience including cooling urban areas during heat waves, reduce water run-off during flash flooding and store carbon.</p>
Part C – General Policies Applying to All Development			
5 General Principles Policy for all Development			
Policy GP 1 General Principles	107	Support	The Housing Executive welcomes this policy, which ensures quality developments that protect the environment and provide benefits to local communities. The Housing Executive supports an approach where proposals will be granted planning permission where they contribute to and further sustainable development.

Policy	Page / Paragraph	Support / Objection	Comments
			<p>a) Furthering Sustainable Development In relation to the first criteria set out under a) “it generally aligns with the LDP Spatial Growth Strategy; we believe the word “generally” could be removed as the Spatial Growth Strategy already contains flexibility.</p> <p>Due to significant habitat loss, and as Northern Ireland ranks the 12th worst most nature-depleted regions, out of 240 countries, we believe that the policy could include the principle of biodiversity net gain. We also support design solutions such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs and welcome the promotion of nature-based solutions such as green walls and roofs, street trees and SuDS to assist with biodiversity net gain.</p> <p>b) Design Quality and Respecting Local Character and Distinctiveness The Housing Executive supports this policy to ensure good quality design and a place making approach to development, which will provide a sense of place, attract investment and improve well-being.</p> <p>We believe that Place Making is a people-centred approach to the planning, design and management of places to strengthen the connections between people and the places they share. Development should be sensitive to the context of an area and to the uses and activities of an area. We believe there could be additional criteria that applicants should engage and collaborate with local people to create developments that contribute to a shared vision for areas and neighbourhoods, rather than simple consultation. This approach will help to provide understanding of the local context of a place, how people use a space, the local activities and movements that take place. Community involvement helps enhance a sense of community, belonging and the sense of ownership, resulting in interventions that are popular and long lasting.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>We would like to see the Plan promote the reuse and refurbishment of vacant built heritage properties. These could provide space for residential use, services and amenities. This also can reduce embodied carbon emissions.</p> <p>c) Safeguarding Residential Amenity We support the identified criteria to protect residential amenity which can ensure the quality of life for residents is not adversely affected.</p> <p>d) Access, Movement and Parking We would like a stronger reference to integrated patterns of development which will reduce the need to travel and increase access. We would like to see housing located in areas with nearby services and with good access to public transport, walking and cycling facilities.</p> <p>We welcome that the policy includes a criterion “a movement pattern is provided that, insofar as is practicable, maximises active travel (walking, wheeling and cycling) and sustainable transport modes, respects pedestrian priority”.</p> <p>We believe that the policy should promote that streets are designed as places and prioritise people rather than vehicles. As well as contributing to the reduction of greenhouse gases and promoting active lifestyles, 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 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, should be promoted. Designing developments where pedestrians and cyclists are given priority help support better health outcomes and are more inclusive than car-centric environments.</p> <p>e) Safety We support criteria e “Safety and Safeguarding of Human Health and Wellbeing” as the Housing Executive is committed to reducing housing-related health inequalities. In addition, we would like to see the inclusion of Health Impact Assessments for major development. These are often a</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>requirement for planning applications in GB, and they can help meet the SPPS and Community Planning objective to improve health and wellbeing. The Housing Executive recognises the importance of considering health as part of the planning process and that health impacts are considered in policy formulation.</p> <p>We would welcome the inclusion of an aim to restrict air pollution. Air pollution can exacerbate pre-existing conditions, and it should also be recognised that it can have causal effects. For example, air pollution from traffic emissions contributes to respiratory and neurological illness, depression, stress and premature death. In addition, while electric vehicles (EVs) contribute less to air pollution than petrol or diesel cars, in terms of exhaust emissions; they still produce non-exhaust emissions from sources like tyres, brakes, and road wear. The heavier weight of EVs can also lead to increased wear on these components, potentially offsetting some of the benefits of zero tailpipe emissions. Therefore, we believe there is a need to focus on reducing all car use to improve air quality.</p> <p>We welcome the inclusion of Secured by Design principles which can also help reduce social exclusion, the risk of crime and fear of crime and to promote personal safety.</p>
6 Planning Agreements			
Policy PA 1 Planning Agreements	119	Support	<p>We support the policy in relation to Section 76 planning agreements. A planning agreement is 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> <p>The Housing Executive welcomes that paragraph 6.1 refers to developer contributions and that planning agreements be used to secure a proportion of affordable housing in a new development.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			The Housing Executive recognises that policies for developer contributions ensure the uplift in land values, generated by the granting of planning permission, is used to promote sustainable communities through wider social benefits to local people. Developer contributions have been long established in Great Britain and Ireland to contribute to the provision or upgrading of critical public infrastructure, including water and for education, health, utilities, and to help fund affordable housing. A developer contribution for affordable housing provision would help provide much needed affordable housing, including social housing.
Part D - Strategic and Operational Topic Policies			
7 Housing			
Housing Strategy	126	Support	The Housing Executive supports the proposed housing strategy. We welcome that the Plan will facilitate a range of house types, sizes and tenures to ensure housing meets the needs of everyone and this will be supported by HOU 3 and HOU 4. We would like to see a specific reference to mixed tenure and a housing mix policy. Mixed tenure housing can support the regeneration of disadvantaged and deprived areas and promotes inclusive neighbourhoods and a balanced community where people with different backgrounds, ages and abilities can live together.
Policy HOU 1 Housing Development in Settlements	128	Support	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 and ensure that proposals have been formulated in line with LDP Policy. We also believe the use of Planning Agreements can support the effective implementation of policy and can ensure the delivery of necessary infrastructure, thereby providing place management.

Policy	Page / Paragraph	Support / Objection	Comments
			<p>Due to the potential for sewage capacity issues to impact significantly on proposals for housing developments, we would like to see reference to NI Water’s pre-development enquiry service and a requirement for these to be submitted prior to the submission of any formal planning submission, as per NI Water advice, to ascertain the availability and capacity of mains infrastructure.</p>
<p>Policy HOU 2 Design of New Residential Development</p>	<p>132</p>	<p>Support</p>	<p>We welcome Policy HOU 2 to help ensure high quality design that protects and promotes the wellbeing of occupants.</p> <p>In relation to criteria (m) under Established Residential Areas, we would like to see all new dwellings meet the requirement that all dwelling units built to minimum size standards as set out in Annex A. The policy may need clarified as it seems to suggest the space standards only apply to units in Established Residential Areas. Standards set out in Annex A are currently contained in PPS 7 for all housing development and help to ensure all 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, exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion.” (Homewise-Report.pdf)</p> <p>Paragraph 7.47 – We welcome the reference to the role of design in reducing energy and water consumption, minimising CO2 emissions and incorporating SuDS. This could also include other sustainable design and climate resilience principles such as increased circularity and minimising embodied carbon, passive house design and nature-based solutions including green walls and roofs. It may also be helpful to cross reference other relevant policies which set out detailed requirements in relation to renewable energy, energy efficiency and climate resilience, such as policy RE 2 and CC 1.</p>

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			<p>Paragraph 7.52 – Rather than encouraged, we suggest that permeable paving materials should be strongly encouraged or required for private driveways, patios, paths, and shared hard landscaped surfaces to increase water infiltration.</p> <p>7.60 – We support the requirement for residential developments to demonstrate how sustainable modes of travel have been maximised in line with Policy AT 1 Supporting Active Travel and Sustainable Transport. The policy could also promote the integration of sustainable transport and land use, which improves connectivity and supports a modal shift (such as walking, cycling, wheeling and public transport), reducing the need to travel, demand and travel times. This will be a key element to achieving targets to reduce greenhouse gas emissions and improve air quality. We note that the Sustainable Travel Hierarchy set out in DfE’s Energy Strategy for NI places “substitute trips” at the top, followed by “shift modes” and finally “switch fuels”, the first two steps of which are aimed at reducing the amount of travel that people undertake using private vehicles (https://www.economy-ni.gov.uk/publications/energy-strategy-path-net-zero-energy).</p> <p>7.62 - We welcome the reference to fostering sustainable movement patterns and believe that greater emphasis could be placed on people rather than vehicles: the sustainable transport hierarchy aims to prioritise pedestrians and cyclists, followed closely by public transport. We would like to see housing located in areas with nearby services and with good access to public transport, walking and cycling facilities. As well as contributing to the reduction of greenhouse gases and promoting active lifestyles, 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 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, should be promoted. Designing developments where pedestrians and cyclists are given priority help support better health outcomes and are more inclusive than car-centric environments.</p>

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			<p>7.64 - We would like some flexibility in the application of parking standards in social housing schemes, due to lower car ownership levels for social housing tenants, than other tenures of development.</p> <p>We welcome the inclusion of the reference to the provision of electric vehicle charging. We would like to see this also included in other relevant policies including RE 2 and TRAN 8. The Energy Strategy acknowledges that a significant increase in EV charge points will be required to support the transition to EVs including public, home, on-street, workplace and destination charge points. The RDS includes “Use more energy efficient forms of transport” including fuel efficient vehicles and vehicles which do not rely on fossil fuels, as a measure to mitigate climate change.</p> <p>7.66 - We welcome the conversion and reuse of existing buildings for flats or apartments as this can assist with embodied carbon reductions, increase circularity, promote town centre living and act as a catalyst for regeneration, provided this is done through sympathetic adaptive reuse.</p> <p>7.70 - We note that the minimum 150m2 size for conversion may be reduced in locations benefiting from strong links to services, facilities and at transport nodes. The space standards in Annex A should also be applied to conversions to ensure that proposed flat or apartment units provide adequate space for occupants as this is important in the creation of high-quality conversions. Conversions should also be able to meet the requirements of HOU 4.</p>

Policy	Page / Paragraph	Support / Objection	Comments
Policy HOU 3 Affordable Housing	146	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. This policy will also help meet the aim of the Programme for Government 2024-2027 priority to Provide More Social, Affordable and Sustainable Housing, the Housing Supply Strategy 2024-2039 objective to Increase housing supply and affordable options across all tenures to meet housing need and demand, the draft Anti-Poverty Strategy 2025-2035 commitment to ensure access to good quality, affordable and sustainable homes and the RDS and SPPS aims to meet the housing needs of the whole community.</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>We welcome that it is stated that the Housing Executive has a role in the identification of need.</p> <p>We support the threshold of five or more dwelling units. We believe there may be an opportunity to uplift the size threshold slightly to 0.2 hectares which may achieve five or more units at a density of 25 units per hectare. We support a low threshold as there is a high level of committed housing sites, and this can maximise the number of sites to which the policy can be applied. This can also be applied to rural areas where there is generally smaller scale development.</p> <p>The Housing Executive accepts the provisions of the policy, however, we would like to see more detail on how “practicable” will be defined in the statement “Where it can be demonstrated that it is not viable or practicable for a proposed development to meet the above policy requirements in full, the Council will consider acceptable alternatives on a case-by-case basis.”</p> <p>7.79 – For clarification, we would add the word “external” before design i.e. “In addition, the external design, external finishes and appearance of the affordable housing element shall reflect</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>the character of the remainder of the scheme." There may be difference in design internally, e.g. to accord with DfC's HA Guide for social housing (also applies to policy box pg. 146).</p> <p>We welcome the reference that the affordable housing will be interspersed with the market housing to provide mixed tenure, however, there may be instances in apartment schemes where a clustering of affordable units may be acceptable to allow for more efficient management arrangements.</p> <p>In relation to intermediate rent units, DfC's Intermediate Rent Policy and Design Standards could also be referenced <u>Intermediate Rent Policy and Homes for Intermediate Rent Design Standards Department for Communities (communities-ni.gov.uk)</u>.</p> <p>7.80 – Could also encourage applicants to seek advice from Council in the form of a PAD, prior to the submission of a planning application, as these can help result in frontloaded, higher quality planning applications which can be processed more efficiently. The Housing Executive can provide details of current housing need and the housing mix required to planners via a PAD consultation which can better inform planning applications. It may be helpful to state that issues such as viability and section 76 agreements, if applicable, should also be discussed at as early a stage as possible, to avoid undue delay later in the planning process (we note that para 1.33 generally encourages early engagement in the preparation of development proposals).</p> <p>7.83 – May wish to add that any viability appraisal to the Council must be carried out by a suitably qualified professional, to help ensure the statement is of a satisfactory standard and fully evidenced; to enable the Council to carry out its own full assessment of the information submitted and help avoid undue delay in the application process.</p> <p>7.84 – We would like a stronger term used in the statement "encouragement for the delivery of residential development on the site". Perhaps something like the central or core preference for delivery of residential development on site.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>7.88 – We welcome the inclusion of the checklist outlined in Annex C. We would like to see Supplementary Planning Guidance which could set out:</p> <ul style="list-style-type: none"> • Process and roles, • a definition of “practicable” in relation to viability, • details of alternatives if affordable housing requirements are not viable or practicable, • the main types of affordable housing products currently available and that this definition may be expanded in future as new affordable housing products are made available.
Policy HOU 4 Accessible and Adaptable Homes	150	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>
Policy HOU 5 Traveller Accommodation	152	Support	<p>We support this policy to ensure that Irish Travellers’ needs are adequately catered for within the LDP. We would like to see reference to the Design Guide for Travellers' Sites in Northern Ireland, as adherence to this guidance will assist in the delivery of high-quality designed sites, improving living standards for Irish Travellers, thereby improving health and wellbeing.</p> <p>As the Housing Executive is responsible for the assessment of Irish Traveller accommodation needs, we suggest criteria a) be amended to state: “there is a demonstrable need for Traveller accommodation as identified by the Housing Executive.”</p> <p>The first sentence of paragraph 7.99 could be amended to state: “Where a specific locational need is identified by the Housing Executive, this will be zoned for Travellers Accommodation in the Local Policies Plan (LPP).”</p>

Policy	Page / Paragraph	Support / Objection	Comments
Policy HOU 7 Residential Extensions and Alterations	153	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. We also welcome that there may be an exception to relax policy criteria to provide ancillary accommodation for people with disabilities.
Policy HOU 7 Protected Housing Areas in Town Centres	156	Support	We welcome the protection of residential use within town centres. Town centre living can help promote the vitality and viability of centres and can provide accessible retail and services, for households living in central areas.
Policy HOU 8 Houses of Multiple Occupation (HMO)	157	Support	The Housing Executive supports this policy, which can provide additional affordable housing, especially for single households. We also believe the limitation of HMOs will be appropriate to ensure a balance of households within established residential areas. We believe the criteria set out in HOU 8 will help ensure that residents of HMOs live in suitable accommodation.
Policies HOU 9, HOU 10, HOU 13, HOU 14, HOU 15, HOU 16, HOU 17	161	Support	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. 7.135 - We support the use of a biodiversity checklist to help identify if a development proposal is likely to adversely affect any biodiversity and natural heritage interests and whether further ecological assessments/surveys may be required. We would like this extended to all development proposals and it could be included within GP 1 General Principles, rather than solely within the J&A for HOU 10 Replacement Dwellings.
Policy HOU 11 Conversion and Reuse of Existing Buildings	165	Support	The Housing Executive supports this policy, where reuse and adaptation can help preserve traditional and vernacular buildings.

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Policy HOU 12 Affordable Housing in the Countryside	167	Support	We welcome the retention of a rural exceptions policy where a need has been identified by the Housing Executive. The inclusion of policy HOU 12 will provide flexibility should need rise over the Plan period. We would like to see the Housing Executive included as a potential applicant to this exceptions policy.
8 Open Space, Sport and Outdoor Recreation			
Open Space Strategy	181	Support	<p>The Housing Executive supports the protection and enhancement of open space. Open space contributes to physical and mental health as well as promoting community engagement, providing opportunities for wildlife and biodiversity and providing an attractive environment. We welcome that the policy will promote open space as an integral element of housing developments, green and blue infrastructure to provide active travel corridors and greenways to promote a sense of place and peoples' wellbeing. We would like to see more of an emphasis on the importance of open space in improving environmental quality and climate resilience, for example, air quality, urban cooling and flood alleviation and the inclusion of community growing spaces and allotments as an outdoor recreation facility.</p> <p>We note the reference at paragraph 8.14 to the "Sport Matters – The NI Strategy for Sport and Physical Recreation 2009-2019". This Strategy has now been replaced by the "Active Living- Sport and Physical Activity Strategy for Northern Ireland", published in March 2022.</p>
Policy OS 1 Protection of Open Space	184	Support	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.

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			<p>We recognise that in some exceptional 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 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 welcome that the development of social housing may be permitted as an exception to the presumption against loss of open space.</p> <p>The Housing Executive, in conjunction with DoE, produced a Joint Protocol for the operation of the open space exception policy in PPS8. 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>
Policy OS 2 Public Open Space in New Residential Development	188	Support	We support this policy for the provision of open space in new residential developments. This is important to provide an attractive and healthy residential environment. We support the reference to greening of areas which can contribute to health, wellbeing and quality of life and promote biodiversity and support climate change mitigation and adaptation.
Policy OS 3 New Open Space Provision in Settlements	193	Support	The Housing Executive supports policy for the provision of new open space provision within settlements. We believe Community Growing Spaces and Allotments can encourage healthy lifestyles and promote community cohesion.
Policy OS 4 Greenways, Blueways and Community Greenways	195	Support	The Housing Executive agrees with the policy approach to protect and enhance greenways, blueways and community greenways across the Council area, which will form part of a green and blue infrastructure network. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion, air pollution and greenhouse gas emissions. Greenways, blueways and 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 the countryside, providing wildlife corridors, attracting visitors and providing economic

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			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. To further promote the use of greenways, we believe that bike stations could encourage people to cycle, over a longer distance than walking, improving connectivity and promoting modal shift.
Policies OS 5 - OS 9	196	Support	The Housing Executive supports Policies OS 5-9, which will encourage active and healthy lifestyles, while protecting environmental amenity and ensuring there is no adverse effect on local residents and neighbourhoods.
9. Health, Education, Community and Culture			
Policies HECC 1 & HECC 2	210	Support	We support the allocation and protection of land for education, health, community and cultural facilities. These services and facilities are necessary components of sustainable communities. We also support that community facility developments should promote active travel and travel by public transport.
10 Economic Development			
Economic Development Strategy	217	Support	<p>We support the Economic Development Strategy and operational policies for economic development to ensure there is a generous supply of suitable land to meet the economic development needs of the Borough over the plan period, to deliver sustainable and environmentally sensitive economic growth as this will help address deprivation.</p> <p>We would like to see paragraph 10.7 include a criterion to locate all economic and employment opportunities in areas which are accessible to all members of the community, and which connect</p>

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			to the public transport system, and not only within mixed use developments.
Policies ED 1 – ED 3	221	Support	The Housing Executive welcomes the policy focus on employment growth within towns across the Council area. 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. The availability of transport directly affects social mobility and employment prospects, particularly for those who live in areas with limited transport links. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the LDP.
Policies ED 4 – ED 9	227	Support	In respect of economic development in the countryside, we support the policies that provide opportunities likely to benefit and sustain the rural community, while protecting or enhancing the character of the rural area.
Policy ED 10	239	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 unacceptable industrial emissions, noise or heavy traffic.
11 Town Centres and Retailing			

Retail Strategy	242	Support	<p>We strongly welcome these policies which promote the regeneration of the Borough's town centres as quality places to live, work, shop and visit. We support the promotion of a town centre first approach for retail and other complementary functions, enhancing diversity of use to ensure town centres are attractive, viable and sustainable which reflects policy within the SPPS. The Housing Executive supports the policy approach of protecting and encouraging town centre living; town centre living initiatives such as Living Over the Shops can stimulate additional activity and footfall, supporting a daytime and evening/night time economy, thereby assisting regeneration. This will help promote accessible retail and services, an important element of sustainable communities and can provide additional affordable housing provision.</p> <p>We support the promotion of high design standards and positive placemaking to ensure town centres are sustainable, accessible and attractive to shoppers, visitors, tourists and businesses (paragraph 11.6), however, we believe that this statement could also include residents. There is potential for a planning policy to support town centre living that ensures there is sufficient infrastructure provision, such as bin storage, adequate natural light, space standards and access to amenity space, to ensure high quality, sustainable housing.</p>
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Strategic Policy RH 1 & Operation Policies RET 1 – RET 6	245	Support	<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 RET1 to help ensure that town centres are vibrant, mixed-use areas, which reflects policy within the SPPS.</p> <p>We support policies RET1 to RET6; however, we would also like to see residential use promoted within town centres as well as commercial, business or community uses. We would like to see residential use specified as a main town centre use, as diversity of uses in town centres, including housing, will help enhance their vitality, viability and resilience. We believe that residential use on the upper floors of retail properties is appropriate within town centres, as Town Centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration, creating safe and welcoming environments through continuous activity and more cohesive communities. This will help promote accessible retail and services, an important element of sustainable communities and can provide additional affordable housing provision.</p>
12 Sustainable Tourism			
Sustainable Tourism Strategy	260	Support	We support the objective to promote the growth of sustainable tourism in appropriate locations, safeguarding tourism assets from inappropriate development, balancing visitor demands with the protection of the natural and historic environment.
14 Natural Environment			
Natural Environment Strategy and Policies NE 1 – NE 6	302	Support	We welcome these policies as biodiversity and habitats have been in significant decline in recent years, we believe this warrants specific attention. The State of Nature report in 2023 records that Northern Ireland is one of the most nature-depleted countries in the world, with widespread habitat

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			<p>loss and degradation; 12% of species assessed are threatened with extinction. This decline is attributed to several factors, which LDP policy can help address including habitat loss and degradation, pollution, climate change, and the spread of invasive species.</p> <p>The Environment Act 2021 in England introduced a legal requirement for all new developments to achieve a 10% increase in biodiversity units, Biodiversity Net Gain (BNG) which compares habitats before and after development. Scotland is developing a policy-led approach to secure biodiversity enhancements through the introduction of a biodiversity metric and national planning policy in Wales requires that every development delivers a net benefit for biodiversity.</p>
15 Historic Environment			
Historic Environment Strategy and Policies HE 1 – HE 14	314	Support	The Housing Executive supports policies which seek to protect and enhance the historic environment as we have a long-standing involvement in partnership-led heritage and regeneration initiatives which have delivered additional private rented sector accommodation and community facilities in towns and villages by restoring and protecting underused historic assets and buildings at risk. The historic environment helps promote a sense of place and belonging to an area, aids the wellbeing of residents by providing vibrant and sustainable communities and places, attracts tourists, acts as a stimulus for regeneration, tackles climate change through sensitive and adaptive, sustainable re-use, and provides leisure and educational value.
16 Coastal Management			
Coastal Management Strategy and Policies CO 1 – CO 3	349	Support	We support the objectives for coastal development and that development should be sustainable and sensitive to the environment. We welcome the need for coastal development to demonstrate

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			<p>adaptability to and mitigation of climate change impacts and the use of nature-based solutions to mitigate these impacts.</p> <p>We also welcome policies that help protect the coast from unacceptable development but permit development that provides public access which benefits and enhances wellbeing. These policies can assist the regeneration of coastal areas and provide opportunities for recreation, education and tourism, leading to active lifestyles and promoting health and well-being of communities.</p>
17 Flooding and Drainage			
Flooding and Drainage Strategy	359	Support	Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. Therefore, we welcome these policies that provide criteria to manage development that may be at risk of flooding or that may increase the risk of flooding elsewhere, to protect flood defences and drainage infrastructure and to promote sustainable drainage solutions to improve water quality.
Policy FLD 1 Development in Fluvial (River) and Coastal Flood Plains	362	Support	We welcome the adoption of a precautionary approach to the identification of land for development and determination of planning applications on sites that are susceptible to flooding. We would like to see Property Flood Resilience (PFR) measures included as a requirement, as these can significantly reduce the impacts of flooding and help people and businesses recover quickly, particularly in places that experience surface water flooding where the depth of flood water tends to be shallower. PFR are simple, low-cost, proven interventions (such as self-closing airbricks) to help resist surface water flooding and significantly reduce the amount of time and cost of recovering from a flood. Where included in a new home, PFR measures are either cost-neutral (e.g. wiring electrical points from above) or low-cost. The additional cost for PFR for a new home is around £1,000 (https://www.aviva.com/newsroom/news-releases/2025/10/uks-iconic-landmarks-at-risk-from-climate-change-by-2050-according-to-new-report/). Improving the flood resilience of

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			individual buildings can be done through resistance – keeping as much water out of the property as possible using measures like flood doors and barriers, self-closing air bricks and non-return valves; recoverability – making internal adaptations, such as having tiled floors, raised electrics and a flood resilient kitchen, so if water does enter the property, it causes as little damage as possible and reduction – reducing water runoff by retaining and improving drainage at the property level through, for instance, encouraging permeable surfaces, rain gardens and rainwater harvesting (https://www.gov.uk/government/publications/floodproof-an-action-plan-to-build-resilience/floodready-an-action-plan-to-build-the-resilience-of-people-and-properties).
Policy FLD 2 Protection of Flood Defence and Drainage Infrastructure	368	Support	We welcome this policy which aims to protect flood defence and drainage infrastructure from development that would affect its operational effectiveness.
Policy FLD 3 Development and Surface Water Flood Risk outside of Flood Plains	370	Support	We welcome the need for drainage assessments to be provided for all new residential developments of 10 or more units or on sites of 1 ha or more and in areas where there is evidence of surface water flooding and in other circumstances as specified in Policy FLD 3. We would like to see PFR measures applied outside of designated floodplains. Flooding is a complex issue with multiple sources, and homes outside high-risk river or coastal zones are increasingly vulnerable to surface water and groundwater flooding due to heavy rainfall and climate change.
Policy FLD 6 Sustainable Drainage	376	Support	We support Policy FLD 6 as the use of Sustainable Drainage Systems (SuDS) are important ways to assist flood prevention. 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. Flood resilience can be increased by using property level SuDS to manage surface water runoff, including permeable paving, rain gardens and rainwater harvesting.

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			<p>We would like Policy FLD 6 amended in line with the RDS which states, “Developments in areas, even those outside flood risk areas should incorporate Sustainable Drainage Systems”. The standardised use of SuDS in all built development, where appropriate, will help improve resilience to flooding, manage water more sustainably by reducing and slowing surface water runoff, relieving pressure on existing sewage systems, enhance biodiversity and improve the quality of runoff water. We note that to support planning applications for single residential units, NI Water is piloting a simplified process within the Belfast City Council area. This approach allows applicants to propose SuDS for managing surface water. Once approved by NI Water, this approach helps speed up the planning decision process and streamlines the process of agreeing connection with NI Water (https://www.niwater.com/services-for-developers/single-residential-unit-suds).</p> <p>The policy should also refer and align as far as possible with DfI’s consultation on Sustainable Drainage Systems in New Housing Developments, and the principles contained within the Living with Water in Belfast Plan.</p>
21 Renewable Energy			
Renewable Energy Strategy	396	Support	<p>The Housing Executive welcomes the Renewable Energy Strategy which aims to positively facilitate the Borough’s full potential for renewable and low carbon energy development, through supporting renewable energy generation and storage in suitable locations and promoting low/zero carbon principles at the heart of all new developments. This approach will help meet the legally-binding net zero by 2050 target set out within Climate Change Act (Northern Ireland) 2022 and support policy and targets set out in the Energy Strategy for Northern Ireland. Renewable energy is central to a just transition to net zero, providing security of supply, increasing affordability and reducing emissions, contributing to a healthier economy and society.</p> <p>21.2 - We welcome the reference to diversification and decentralisation of energy supply via renewables as this has several benefits including improved affordability and greater energy security.</p>

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			<p>Democratisation is also relevant – energy will be generated closer to where it is used with local communities participating, generating and benefitting, which can help alleviate fuel poverty, for example, through the development of community-owned energy schemes such as local heat networks, wind turbines and solar panels on houses and public buildings: https://energysavingtrust.org.uk/path-net-zero-community-energy/</p> <p>21.6 - We strongly welcome the reference to district heating and geothermal energy potential within the Borough. Heat networks have an increased capacity to use variable wind energy or geothermal energy for heat. A geothermal energy sector is developing in Northern Ireland which will need heat networks to prosper. Warm geothermal resources may be suitable for upgrading for home heating, and it may also be possible to store heat produced by renewable electricity and heat pumps underground and to distribute it to individual heat pumps.</p> <p>Belfast City Council have commissioned Innovate UK to develop a Local Area Energy Plan. This includes one scenario that relies primarily on regional energy infrastructure such as offshore wind, hydrogen storage underground and biogas. Another ‘Pioneer City’ scenario looks at using geothermal heat networks in the Belfast Area, storing heat underground, more building retrofitting and reductions in car use.</p> <p>Having hot heat networks can also reduce the size of the electricity system needed to decarbonise heat, as the large heat pumps serving the network can use power at different times from individual, more rural, heat pumps. Alternatively, urban networks can re-use waste heat when power is generated for those single, rural heat pumps. This affects the costs recovered in everybody’s power bills.</p>
Policy RE 1 Renewable and Low/Zero Carbon Energy Development	398	Support	We welcome this policy which facilitates proposals for renewable and zero or low carbon energy generation and storage in suitable locations as these are critical to meeting renewable energy targets in the transition to net zero.

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			<p>Paragraph 21.16 could include biomethane as another example of a renewable and low carbon energy. The Department for the Economy's 'preferred policy position' is to prioritise biomethane as the primary means of decarbonising the gas distribution network. Biomethane is a renewable energy source produced by purifying biogas, which is a gas mixture created from the breakdown of organic matter like food waste, sewage, and animal manure. It is chemically identical to fossil natural gas and can be used for heating, cooking, electricity generation, and as a vehicle fuel, often using existing gas infrastructure. This process of creating biomethane from organic waste helps divert it from landfills and reduces greenhouse gas emissions.</p>
<p>Policy RE 2 Reduced Energy Consumption and Use of Low/Zero-Carbon Energy</p>	<p>407</p>	<p>Support</p>	<p>We welcome this policy which promotes energy efficiency measures as well as the use of renewable energy. As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive believes that new homes should be designed to be energy efficient, low/zero 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>We welcome the reference to a fabric first approach, the use of sustainable construction materials and techniques and the use of passive solar gain and ventilation and cooling. Building to high energy standards now will futureproof new builds, as there will be no need to retrofit to achieve Net Zero. There are increasing numbers of developments in Northern Ireland achieving EPC A ratings. Passive House standards also help to address fuel poverty thereby improving health and wellbeing in addition to reducing energy consumption and costs for occupants.</p> <p>We support the requirement for applicants to demonstrate how developments maximise the promotion of active travel and sustainable transport to assist with reducing transport emissions, as transport is one of the major emitting sectors in Northern Ireland. Development which is centrally located, prioritises pedestrians and cyclists, and is well served by quality public transport services will reduce the need to travel, as well as being more sustainable by reducing demand and travel times. We would like to see reference to the provision of electric vehicle charging points, as set out</p>

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			in policy HOU 2, the Energy Strategy acknowledges that a significant increase in these will be required to support the transition to EVs including public, home, on-street, workplace and destination charge points.
22 Transportation			
Transportation Strategy	412	Support	The Housing Executive welcomes the Transportation Strategy which seeks to concentrate growth in the main towns which have good accessibility and are well connected, integrate sustainable transport and land use through allocation of sites at LPP stage and through policy AT 1, improve active travel and sustainable transport infrastructure with partners and the implementation of the Car Parking Strategy to reduce private car reliance. We welcome reference to the sustainable transport hierarchy which aims to prioritise pedestrians and cyclists, followed closely by public transport. The Transportation Strategy could promote the provision of EV charging points in new developments and public places including carparks, roads and streets, to encourage the use of more sustainable fuels. The Energy Strategy acknowledges that a significant increase in public EV charge points in addition to home, on-street, workplace and destination charge points will be required to support the transition to EVs. The RDS includes “Use more energy efficient forms of transport” including fuel efficient vehicles and vehicles which do not rely on fossil fuels, as a measure to mitigate climate change.
Policy AT 1 Supporting Active Travel and Sustainable Transport	418	Support	We strongly welcome the promotion of active travel and sustainable transport measures within all new development proposals, which will be vital in the transition to net zero and in reducing inequalities and transport poverty by allowing people to access essential services. We support sustainable, inclusive, transport choices such as cycling, wheeling, walking and public transport to counteract climate change and to improve connectivity for those who do not have access to a private car, including children, older people and a large proportion of Housing Executive tenants. We welcome that the policy encourages people-centred design with pedestrians, cyclists and other

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			<p>wheeled users as the focus, as this helps support better health outcomes and creates more inclusive, less car-centric environments. Developments 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, should be promoted.</p> <p>We would like to see a requirement for car parking in new developments to be minimised to help promote safe, active travel, and increased modal shift, accompanied by active travel and quality public transport infrastructure, with appropriate provision made for disabled residents. In areas where car parking levels are reduced studies show that people are more likely to walk, cycle, or choose public transport for daily travel.</p> <p>We note that the Climate Change Act sets a target for a minimum spend of 10% of overall transport budgets on active travel and DfI's long-term vision is to create a seamless, integrated network that allows more people, regardless of age or ability, to choose active travel. The policy could encourage travel demand measures to be incorporated into new developments to reduce car reliance such as car clubs, bike and e-bike share/rental schemes, wheeling and travel cards to incentivise residents to choose active travel or public transport.</p> <p>The policy could also promote the integration of sustainable transport and land use which improves connectivity and supports a modal shift (such as walking, cycling, wheeling and public transport). This will be a key element to achieve targets to reduce greenhouse gas emissions and improve air quality.</p>
Policy TRAN 1 Creating an Accessible Environment	419	Support	We support this policy which requires development proposals to take account of the specific needs of people with disabilities and others whose mobility is impaired in the design to create a more accessible environment for everyone.
Policy TRAN 5 Disused Transport Routes	427	Support	The Housing Executive agrees with the policy approach to protect disused transport routes identified in the LDP or Local Transport Plan for transport or recreational, nature conservation or

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			tourism related purposes, as these can form part of a green and blue infrastructure network, helping to support active travel.
Policy TRAN 6 Transport Assessment	428	Support	<p>We support the requirement for Transport Assessments to review the transport impacts and mitigate against any adverse consequences where development proposals are likely to generate significant travel movements. We also welcome a requirement for Travel Plans, which include a range of measures to encourage sustainable modes of transport.</p> <p>We would like to see the use of Active Travel Assessments and Public Transport Access Levels which measure proximity and frequency of public transport services influence the location and density of housing and services.</p>
Policy TRAN 7 Parking and Servicing Arrangements	429	Support	As car ownership levels amongst social housing tenants are significantly lower than the NI average, we would like see flexibility in the application of car parking provision.
23 Public Utilities, Infrastructure and Connectivity			
Public Utilities, Infrastructure and Connectivity Strategy and Policies EL 1 and TEL 1	438	Support	<p>We welcome policy that states that the provision of new and upgraded telecommunications, electricity and energy infrastructure and utilities will be supported in a sustainable approach where there are no significant adverse impacts on the environment.</p> <p>We recognise that digital connectivity is essential for sustainable economic development and can help reduce social isolation and provide access to services. We therefore support policy TEL 1, which aims to facilitate the development of telecommunications and utilities infrastructure in appropriate locations.</p>

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24 Waste Management			
Waste Management Strategy and Policies WM 1, WM 2, WM 3, WM 4 and WM 5	452	Support	<p>The Housing Executive supports the policies on waste which will help to ensure there are adequate facilities and waste is managed and controlled, to safeguard human health and the environment.</p> <p>The Housing Executive supports sustainable waste management and the use of the waste hierarchy.</p> <p>We welcome the management of waste that supports reuse and recycling, to minimise amounts of waste. We would like to see reference to a circular economy in which we rethink and reduce our use of earth's resources, we switch to regenerative resources, we minimise waste and we maintain the value of products and materials for as long as possible (Draft Circular Economy Strategy for Northern Ireland).</p> <p>We support the objectives including to accommodate investment in public utilities and waste management. Increased investment is required for waste water infrastructure to prevent barriers to development. Investment in vital water infrastructure is also essential to environmental protection and public health.</p> <p>We would like to see a joined-up approach with NI Water, the Council and other developers and infrastructure suppliers such as the Housing Executive to help facilitate development to meet housing needs and the LDP's aim for growth. We would welcome discussions on mitigation measures and prioritisation for social housing development, as this provides a substantial community benefit.</p>
25 Non-Mains Wastewater Infrastructure			

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Non-Mains Wastewater Strategy and Policy NMW 1	465	Support	We welcome the proposed approach to minimise development that relies on non-mains wastewater infrastructure, and where non-mains wastewater infrastructure is required, it is adequately managed to avoid pollution.
Part E: Monitoring and Review			
26 Monitoring and Review			
Monitoring and Review	472	Support	<p>The Housing Executive would welcome assisting the Council on the implementation and monitoring of the draft Plan Strategy Policies, especially in relation to HOU 3 “Affordable Housing”. We also welcome references to our Housing Needs Assessment and 15-year Housing Market Assessment. We are also happy to meet with the Council and share any new data sources over the Plan period, such as our forthcoming research on the Housing Market and new House Condition Surveys.</p> <p>We welcome indicator 2c to identify the percentage of affordable homes approved. However, we would like an indicator that shows the number of affordable homes delivered/completed.</p>

