

Sinead McEvoy

From: Blease, Catherine [REDACTED]
Sent: 04 May 2020 13:57
To: Sinead McEvoy
Cc: Hasson, Aine
Subject: FW: Letter to Development Plan Team
Attachments: Letter to Development Plan Team.pdf

Sinead,

Please note that our response to the Mid Ulster draft Plan Strategy of February 2019, remains relevant for the re consultation version (March 2020). Our original objection, dated 16th April 2019, is attached and we would like these comments to be considered by the Council, with regard to the latest draft Plan Strategy or as part of an Independent Examination. Again, we welcome any further discussion with you and to assist you in any way we can.

Many thanks,
Catherine

Catherine Blease|Central Planning and Policy Manager|Northern Ireland Housing Executive|2 Adelaide Street, Belfast, BT2 8PB|email: [REDACTED]
[REDACTED] www.nihe.gov.uk

-----Original Message-----

From: McLaughlin, Maria
Sent: 18 April 2019 09:48
To: Blease, Catherine
Subject: FW: Letter to Development Plan Team

Catherine

○ For your file.

Maria.

-----Original Message-----

From: xeroxmfd@nigov.net [mailto:xeroxmfd@nigov.net]
Sent: 18 April 2019 09:48
To: McLaughlin, Maria
Subject: Letter to Development Plan Team

Please open the attached document. It was scanned and sent to you using a Xerox Multifunction Printer.

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***** IMPORTANT MESSAGE *****

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Elaine Mullin

From: Blease, Catherine <[REDACTED]>
Sent: 18 April 2019 12:28
To: DevelopmentPlan@midulstercouncil.org
Cc: Hickey, Ailbhe; Corrigan, Kevin; McCollam, Joanne
Subject: Housing Executive Response to Plan Strategy
Attachments: NIHE Mid Ulster Plan Strategy Response.docx

Sinead,

Please see the Housing Executive’s response to the Mid Ulster LDP draft Plan Strategy, attached. A hard copy signed by our Chief Executive and on letterhead will follow.

Please feel free to contact Ailbhe or me if there is any further you need to discuss,
Many thanks,
Catherine

Catherine Blease | Central Planning and Policy Manager | Northern Ireland Housing Executive | 2 Adelaide Street,
Belfast, BT2 8PB | email: [REDACTED] | Phone: ext [REDACTED] | www.nihe.gov.uk

Housing
Executive

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Development Plan Team,
Planning Department,
Mid Ulster District Council,
50 Ballyronan Road,
Magherafelt,
BT45 6EN

16th April 2019

Dear Chris,

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

We support the LDP Objectives and many of the policies contained within the dPS, however, we believe some of the Plan Objectives may be best achieved through amendments to the proposed policies, to ensure that sustainable development is delivered.

The Housing Executive strongly supports the Regional Development Strategy aim of sustaining rural communities and believes that proposed growth and housing allocations, within the countryside, should be focused on settlements, (local towns, villages and small settlements), rather than the open countryside. We believe dPS allowance for the development of 4,380 dwellings or up to 40% of the District's Housing Growth Indicators to be located in the open countryside is not sustainable development. The proposed housing allocation could be considered to conflict with the LDP's Strategic Objectives to increase accessibility to services, facilities, and employment to those without access to a private car, to reduce contributions to climate change and to protect the natural environment.

As the Council has engaged and consulted with the Housing Executive on identifying land for affordable housing in the LDP, we understand that Key Site Requirement / allocation approach to meeting housing need will be implemented at the Local Policy Plan stage. The Housing Executive has welcomed Mid Ulster's offer to release land at Dungannon for affordable housing to meet a proportion of the current need before the remainder can be addressed by the Local Policy Plan, which may be adopted in the next two or three years. While the Housing Executive has supported the release of this land, our preferred approach is a development management approach, which can better provide mixed tenure development across the council area and is more flexible to meet need, as it can be applied to all housing applications, including windfall sites.

While we have included objections, within our representation, we would welcome discussing these with the Council to explain our concerns and potentially, agree a joint position before an Independent Examination.

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

I trust this information is of assistance,

Yours faithfully,

Clark Bailie
Chief Executive

Housing Executive Response to Mid Ulster Local Development Plan Draft Plan Strategy

Policy	Paragraph	Representation / Support / Objection	Comments
Introduction			
Introduction	N/A	Representation	<p>We would like to see further information included in this section on how prematurity would be applied.</p> <p>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, there is no presumption that a Local Development Plan (LDP) is sound (Development Plan Practice Note 6), the option to apply prematurity is still included within the SPPS. The SPPS states that where any LDP is under preparation or review, it may be justifiable to refuse planning permission on grounds of prematurity, where development proposals would, individually or cumulatively, prejudice the outcome of the plan process. In addition, the SPPS does not include a statement that the weight attached depends on the stage of plan preparation, increasing as successive stages are reached.</p> <p>We believe that the draft Plan Strategy (dPS) could be a material consideration in the</p>

Policy	Paragraph	Representation / Support / Objection	Comments
			determination of planning applications in Mid Ulster, as the extant plans are now out of date. These extant Plans include the Cookstown Area Plan 2010, the Dungannon and South Tyrone Area Plan 2010 and the Magherafelt Area Plan 2015, two of which, were prepared before the publication of the current Regional Development Strategy (RDS) and all were published before the enactment of the Planning Act (Northern Ireland) 2011.
Local Development Plan, Vision and Objectives			
Vision	3.0	Representation	The Housing Executive would like clarification on the LDP vision, this should be should be set out clearly within section 3.0. As currently set out, it is unclear whether the vision relates to the first sentence of paragraph 3.1, the entirety of paragraph 3.1 or if it includes text from further paragraphs below.
Plan Objectives	3.15	Support	<p>We support the Plan Objectives. In particular, we welcome the references within Accommodating People and Creating Places to “provide range of housing to meet the needs of families, elderly and disabled people”, “to accommodate development, which allows people to remain within their own communities” and to “promote shared space to bring people together with equality of opportunity”.</p> <p>We support the aim contained in the Objective Creating Jobs and Promoting Prosperity to “encourage energy efficiencies and promote use of renewable energy”. The Housing Executive as the Home Energy Conservation Authority promotes energy efficiency and the use of renewable energy to reduce fuel poverty and to aid reduction in carbon emissions.</p> <p>We also support the objective to “reduce contributions and vulnerability to climate change</p>

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			and to reduce flood risk and the adverse consequences of flooding” under Enhancing the Environment and Improving Infrastructure.
Mid Ulster’s Spatial Planning Framework			
SPF 1	4.7	Objection	<p>The Housing Executive supports the statement that Mid Ulster’s Spatial Planning Framework (SPF) will be based on managed growth based on sustainable patterns of development in accordance with the Regional Development Strategy (RDS). We also support that development limits will be defined in order to achieve compact urban forms and to increase accessibility.</p> <p>However, we believe these statements need to be underwritten with robust policies. We would also like the policies to contain more detail, in order to provide certainty to developers and stakeholders. The Policy states that land will be reserved to accommodate 60% of Housing Growth Indicators (HGI) within the Hubs; however, there seems to be no hierarchy in relation to the growth of local towns, villages, small settlements and open countryside. The only stipulation is that no more that 40% of HGI should be in the open countryside.</p> <p>Annex A does provides more detail, but seems to contradict the 60% of the share of the HGI towards the Hubs, set out in SPF 2, by stating the HGI share may vary significantly from 30% to 60%. This Annex also proposes a share of the HGI, which directly relates to the proportion of existing households in each location, simply continuing existing growth rates without any positive planning to achieve the regional planning objectives of sustainable development. The tables in Annex A do not take account of the share of up to 4,380 units</p>

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			<p>that may be allowed in the open countryside; if these are developed and the settlement growth is achieved, this will mean the HGIs could be substantially exceeded and this should be acknowledged within the SPF.</p> <p>NISRA's Multiple Deprivation Measures 2017 records that Mid Ulster have some of the most deprived super output areas, in Northern Ireland, in relation to physical access to key services, most notably Dunnamore and Lissan. We believe that the SPF pattern of continuing dispersed development will maintain or increase spatial inequalities.</p> <p>The SPF allocation does not take appropriate account of the RDS. The Plan does not include any reference to the Employment Land Availability Framework or the Housing Evaluation Framework and that due weight needs to be given to the leading role of the Hubs. The RDS also sets a target that 60% of housing land should be on brownfield sites within the urban footprint. Due to committed zoned greenfield sites, outside the urban footprint but within settlement limits within the Hubs, and the low proposed growth within local towns, it is unlikely that the 60% RDS requirement for brownfield sites can be achieved.</p> <p>We believe that this draft SPS can be considered to be in conflict with the aims of the RDS, including supporting sustainable development, improving connectivity, protecting the environment, reducing our carbon footprint, promoting urban renaissance through compact urban form.</p> <p>We believe that the policy fails the following soundness tests:</p>

Policy	Paragraph	Representation / Support / Objection	Comments
			<p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy. The RDS promotes sustainable development. It includes strategic aims to improve connectivity, promote health and well-being, protect, and enhance the environment, to reduce our carbon footprint and to facilitate adaptation to climate change. • C3 Did the Council take account of policy and guidance issued by the Department The Planning Act (Northern Ireland) 2011, the SPPS, and the Sustainable Development Strategy all include a key aim to further sustainable development. <p>The Housing Executive strongly supports the RDS aim of sustaining rural communities but believes housing allocation within the countryside should be focused on settlements, local towns, villages and small settlements, rather than the open countryside. This will better promote an aim of the draft Programme for Government to reduce travel demand and travel times, through the integration of land use planning and transport.</p> <p>We would also like to see amendments to the Sustainability Appraisal in relation to the Housing Allocation Strategy and the Settlement Hierarchy. We believe that the preferred options will have negative social effects, which have not been adequately taken into account. We believe that dispersed development will lead to social exclusion, especially for groups such as children and older people and can have a detrimental effect on health and wellbeing. The proposed approach can lead to increased isolation, inaccessibility to services and facilities and will increase the need travel by car, raising traffic emissions. We also</p>

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			<p>believe the differences between the two options for the Settlement Hierarchy section have been overstated, with both options adhering closely to the existing hierarchy.</p> <p>Please also see comments in relation to SPF 6.</p>
SPF 2	4.11 - 4.17	Support	<p>We welcome the policy focus on residential, employment and administrative growth within the main towns of Cookstown, Dunggannon and Magherafelt and the town centre first approach for service provision. We also welcome that to ensure the availability of land over the plan period, a phased approach to land release will be adopted. This will provide flexibility and will ensure that the Plan has the ability to meet housing need within these locations. We support the identified criteria for selecting housing land:</p> <ul style="list-style-type: none"> • have access to existing community facilities and services; • can avail of existing infrastructure such as water, waste and sewerage; • avoid flood risk; • have access to public transport; and • do not impact on the character of the town or any heritage assets.
SPF 3	4.20	Representation	<p>The Housing Executive supports the consolidation of the local towns of Coalisland and Maghera as service centres and that they will offer opportunities for housing development. While we understand that the proportion of the district population living in these towns is low, we would like to see the Spatial Strategy positively direct further growth to the main and local towns, rather than simply continuing current trends of housing growth in the countryside. Further residential development within these towns can aid regeneration and can support their role as service centres.</p>

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SPF 4 & 5	4.25 - 4.30	Representation	<p>The Housing Executive supports development within villages and small settlements appropriate to the scale and character of these settlements. We believe a focus of housing development within settlement limits can sustain rural communities, an aim of the RDS. However, we would have concerns with the suggestion that there will be flexibility to accommodate development outside settlement limits. We believe that this is contrary to the criteria in 4.10, to achieve compact urban forms, avoid urban sprawl and marring the distinction of the settlement and the countryside. We support the phasing of the release of land within settlement limits that is set according to an evidence base, and to allow for any predicted growth to occur in a sustainable and planned way that is not simply reactive to planning applications, but rather directs planning applications to appropriate locations, where there is infrastructure. In addition, we disagree with paragraph 4.25 that states villages are not appropriate locations for people who live in the open countryside, and are not seen as key service centres. We believe villages, are important as part of a network of service centres and services could be better supported in villages, if they are identified for population growth.</p> <p>While the Housing Executive supports the retention of a rural exceptions policy, we would prefer to see affordable housing located in designated housing areas.</p>
SPF 6	4.32 – 4.36	Objection	<p>The Housing Executive objects to SPF 6, which allows the development of 4,380 units or up to 40% of the District’s HGIs in the open countryside. We do not consider this as sustainable development.</p>

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			<p>We believe that the policy fails the following soundness tests:<u>Soundness Tests</u></p> <ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy. The RDS promotes sustainable development. It includes strategic aims to improve connectivity, promote health and well-being, protect, and enhance the environment, to reduce our carbon footprint and to facilitate adaptation to climate change. • C3 Did the Council take account of policy and guidance issued by the Department The Planning Act (Northern Ireland) 2011, the SPPS, and the Sustainable Development Strategy all include a key aim to further sustainable development. <p>The Housing Executive strongly supports the aim of sustaining rural communities but believes that a much higher proportion should be allocated to the main towns, local towns, villages and small settlements rather than the open countryside. The proposed housing allocation split could be considered to conflict with the LDP's Strategic Objectives to increase accessibility to services, facilities, and employment to those without access to a private car, to reduce contributions to climate change and to protect the natural environment.</p> <p>The Housing Executive believes that the LDP should aim to curtail the growth of single dwellings in the countryside. Large numbers of dispersed rural dwellings erode the character of the countryside, can contribute to social isolation, particularly for an ageing population, can add to pollution due to reliance on the private car, and increase the potential for negative environmental impacts due to increased numbers of septic tanks.</p> <p>Reduced reliance on private cars can contribute to the reduction of greenhouse gases and</p>

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			<p>promote active lifestyles, key aims in the SPPS. Therefore, we would like to see future housing developments concentrated in locations with good access to public transport, walking and cycling facilities. In addition, public transport is often the only available source of transport for the elderly, children, and those living in affordable housing.</p> <p>Small towns, villages, and small settlements offer access to services and resources for local residents, including access to public transport. This promotes connectivity and more sustainable patterns of travel. It enhances the vibrancy of these settlements, and helps to sustain commercial and community amenities and facilities.</p> <p>The Housing Executive notes that the LDP's spatial strategy aims to continue the trend of 40% of the population living in the open countryside. However we believe that the plan needs to take a positive role to influence development and that a housing allocation with greater emphasis on small towns, villages and small settlements would be better aligned with the RDS, particularly the Housing Evaluation Framework, the SPPS, and the Sustainable Development Strategy.</p> <p>In addition, we would like further clarification on how this policy would be implemented. We believe the 40% figure includes all dwellings outlined in draft Policy CT2, and once the 40% approval rate is reached, this will trigger a Plan Review, and would require restrictions to the provisions set out in Policy CT2. As this would need necessary consultation and an Independent Examination, this could take several months to complete, and we would like to know if applications under CT 2 would still be accepted. If applications are still accepted before a Plan Review takes place, there is likely to be a sharp increase in applications further</p>

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	4.37 - 4.40	Representation	<p>surpassing the 40% figure. We would like clarification that once the rate of 40% dwellings in the countryside is achieved, further applications will not be determined as sustainable development and will not be granted planning permission. With regard to the HGIs, which end in 2025, will an annual rate be used, or a total HGI rate until the nominal end date of the LDP. We believe the 40% figure will be reached as the new relaxed countryside policies will result in a significant increase in housing applications in the open countryside.</p> <p>In relation to Rural Industrial Policy Areas, we would like to see the dPS refer to towns as the primary location for economic development, with a sequential test undertaken for locations outside the main Hubs and local towns. As towns have more public transport connections and have a local population, the location of employment zonings in these settlements will help facilitate the Plan objective to create jobs, which are accessible to all, including those without a private car.</p>
SPF 7	4.43 - 4.46	Objection	<p>We do not support the designation of Dispersed Rural Communities (DRCs) as we do not consider these as sustainable development.</p> <p>We believe that the policy fails the following soundness tests:</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> C1 Did the Council take account of the Regional Development Strategy. The RDS promotes sustainable development. It includes strategic aims to improve connectivity, promote health and well-being, protect, and enhance the environment, to reduce our carbon footprint and to facilitate adaptation to climate change.

Policy	Paragraph	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> • C3 Did the Council take account of policy and guidance issued by the Department The Planning Act (Northern Ireland) 2011, the SPPS, and the Sustainable Development Strategy all include a key aim to further sustainable development. <p>We believe that development should be focused within settlements. We note that there is no reference to DRCs within the RDS and SPPS, including within the RDS's 'The Hierarchy of Settlements and Related Infrastructure Wheel'. We believe DRCs are contrary to Plan Objectives, including:</p> <ul style="list-style-type: none"> • Accessibility to community services; • Accessibility for those without access to a private car (disproportionally affecting children, disabled and the elderly); • To encourage energy efficiencies; • The need to protect the natural and built environment; and • The likely lack of water, sewage, and telecommunication infrastructure. <p>The Housing Executive views dispersed development, DRCs and large numbers of single dwellings, within the open countryside as unsustainable. We believe that dispersed development in rural areas can isolate people, having a negative impact on their health, separate them from services and facilities, and increase reliance on the private car.</p> <p>This is an especially significant issue in the context of an aging society, where many older people do not have access to, or do not wish to use the private car. A key aspect of sustainable development is development, which reduces the need to travel by private</p>

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			<p>motorised transport. A reduction in the use of private transport will contribute to a reduction in greenhouse gas emissions, thereby ‘mitigating and adapting to climate change’, a central objective of the SPPS. Therefore, in order to promote connectivity and more sustainable patterns of transport and travel, the Housing Executive believes housing development should be consolidated wherever possible, within rural settlements and villages. This would also promote regeneration, enhance the vibrancy of these settlements and would better connect people to economic opportunities as well as health and support services, which would increase well-being.</p> <p>We also believe that DRCs can have a detrimental impact on the environment and rural character of an area, through cumulative development, and due to the general lack of infrastructure in these areas to support even small-scale development. As we object to the three DRCs identified, we would also object to the identification of new DRCs in the Council Area.</p> <p>We would also like to see amendments to the Sustainability Appraisal of DRCs. We believe that the preferred options will have negative social effects, which have not been adequately taken into account. We believe that dispersed development will lead to social exclusion, especially for groups such as children and older people and can have a detrimental effect on health and wellbeing as the proposed approach can lead to increased isolation, inaccessibility to services and facilities and will increase the need travel by car, raising traffic emissions.</p>
SPF 8 & SPF 9	4.47 – 4.55	Support	The Housing Executive supports these policies, which aim to increase connectivity and accessibility to and within the District.

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SPF 10	4.56 – 4.61	Support	The Housing Executive supports policy to protect landscapes and conservation areas, which promote a sense of place and can aid the wellbeing of local people and visitors.
General Principles Planning Policy			
GP1	6.1 -6.10	Support	<p>The Housing Executive supports this General Principles Policy, which help to ensure quality developments.</p> <p>In relation to GP1 (e) we would like some flexibility in the implementation of parking standards in affordable housing schemes, due to different car ownership levels for social housing, than other tenures of development, (56% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).</p> <p>We welcome GP1 (f) that states developments should take account of people with mobility difficulties.</p> <p>We also strongly support GP1 (j), which states that a developer contribution may be sought to provide local infrastructure and community facilities. The Housing Executive believes affordable housing is important community infrastructure and we would like to see developer contributions for the development of affordable housing. A developer contribution for affordable housing would provide access to land, promote mixed tenure development and would reduce the need for housing association grant. This reduction in grant would support a larger programme of new build development, thereby helping to address housing need within the District. In addition, we believe a developer contribution</p>

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			<p>should help to provide infrastructure, including water infrastructure, allowing the release of further land for residential development.</p> <p>However, we would like to see an additional criterion to state all new buildings should be designed, so that they are energy efficient with a fabric first approach to energy demand and should incorporate or allow easy incorporation of renewable energy sources, for example, the use of heat pumps.</p>
Social Policies – Accommodating Growth and Creating Places			
Housing in Settlements Overview, Our Strategy	7.9-7.12	Support	<p>The Housing Executive strongly supports the strategy “to provide policy which ensures quality development, in terms of density, design, amenity, open space, and accessibility whilst also ensuring opportunity exists for social housing which can be integrated into private housing to provide a mixture of tenures”. We believe that this can promote high quality residential developments within mixed tenure estates, enhancing the opportunity for balanced communities.</p> <p>However, we would like to see this strategy amended from “social housing “to “affordable housing”. We note that paragraph 7.18 refers to the SPPS definition that affordable housing refers to social and intermediate housing policies and we would like to see the SPPS definition used consistently within the Plan, or in line with any new definition determined by DFC. A clear definition of affordable housing is needed, to provide certainty for developers and so there is better understanding all stakeholders, and the public. The SPPS definition of affordable housing allows policy that can meet social housing need and the need for household groups on low incomes, who have difficulty accessing social housing and owner</p>

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			occupation.
HOU 1	7.13 – 7.19	Support	<p>We support this phased approach to housing zonings, and specifically the exception allowing phase 2 housing land to be released for social/affordable housing. We would like this statement amended to say, “to meet an identified affordable housing need”. A phased approach to the release of land will also mean that Plan Reviews will be more streamlined leading to quicker outcomes. We also welcome the sequential approach to the release of phased land, giving priority to sites nearer the town centre and with accessibility to health and community facilities, and the availability of infrastructure.</p> <p>However, we are concerned that the Policy states that land has been already zoned as Phase 1 and Phase 2 housing land. While previous development plans had phased land at Dungannon, we believe the new LDP provides an opportunity to review the existing phased housing land and to identify new phases of land for Magherafelt and Cookstown. We believe that phased land should be set out within the dPS in order that the exceptions allowing development on Phase 2 land can be implemented once the dPS is adopted.</p> <p>We welcome the reference in paragraph 7.18 that social housing need will be determined by the Housing Executive. We would like to see this statement include an assessment of affordable housing need. The Housing Executive has a statutory duty to assess all housing need including affordable housing need. In addition, we believe that statements relating to social housing should be broadened to affordable housing. Regional planning policy clearly sets a context for the LDP to include land for intermediate housing, as well as social housing, where there is an identified need.</p>

Policy	Paragraph	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy The RDS states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone. • CE4: It is reasonable flexible to enable it to deal with changing circumstances We would like additional flexibility to meet affordable housing need, over the plan period than offered by a Key Site Requirement/allocation approach. <p>The Housing Executive supports a development management approach, as the primary approach to identify land for affordable housing. Therefore, we object to the threshold within the proposal “In residential developments of 50 units or more or on sites of 2 hectares and over, social housing should be provided at a rate not less than 25% of the total number of units”.</p> <p>We believe that as applications for major developments will be limited, with only one major development during 2017/18, the policy will have limited capability of meeting housing needs across the district, especially in rural areas. We would like to see a lower threshold, due to high numbers of committed sites, to meet affordable housing need in rural areas and to promote mixed tenure development. A lower threshold would better meet the statutory obligation to “have due regard to rural needs” as set out in the Rural Needs Act.</p> <p>The Housing Executive has welcomed Mid Ulster’s offer to release land at Dungannon for affordable housing to meet a proportion of the current need before the remainder can be addressed by the Local Policy Plan, which may be adopted in the next two or three years.</p>

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			<p>While the Housing Executive has supported the release of this land, our preferred approach is a development management approach, which can better provide mixed tenure development across the council area from the adoption of the Plan Strategy.</p> <p>We understand that Key Site Requirement / allocation approach to meeting housing need will be implemented at the Local Policy Plan stage. While we believe that an allocation approach could be used in areas of high housing need, we believe a development management approach is more flexible to meet need. A development management policy offers a number of benefits:</p> <ul style="list-style-type: none"> • Only a proportion of the total units on a site will be specified for affordable housing, therefore, it allows for the development of mixed tenure housing; • There are a high number of committed zoned housing sites, to which a KSR cannot be retrospectively applied. The lack of uncommitted sites will limit the number of affordable housing units than can be delivered by an allocation approach; • A DM policy can require a proportion of affordable housing from windfall sites that could come forward during the life of the plan. Windfall can amount to a significant element of housing growth within the life of the plan; • A DM management policy can apply to sites with lapsed planning permission or to applications for a renewal or amendment to planning permission; • As the policy is delivered through the development management process it may have a higher chance of delivery than zonings or KSRs, as a planning application has been submitted, indicating an intention on behalf of the developer to bring forward a scheme on the site; • It can provide access to sites in areas where housing associations have traditionally

Policy	Paragraph	Representation / Support / Objection	Comments
	7.28	Objection	<p>struggled to acquire land for development;</p> <ul style="list-style-type: none"> • A DM policy can also be considered more equitable than other methods of contribution, as all developers of a scheme over the set threshold may have to provide affordable housing; • Key Site Requirements are a snap shot of housing need at a time and they do not provide a mechanism to require a proportion of housing from windfall housing or lapsed sites (including housing zonings with affordable housing provision), should need rise. They may also encourage developers to deliver windfall housing over planned and zoned housing sites in order to avoid a requirement to provide affordable housing. <p>While we acknowledge the Policy HOU2 aims to provide “accommodation accessible to everyone including people with disabilities”, we would like to see a policy to provide accessible housing, beyond building control standards. We would like to see all new housing developments designed to Lifetime Homes standard and a proportion of wheelchair units required.</p> <p>We believe that the policy fails the following soundness tests:</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> • 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.

Policy	Paragraph	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> <p>• C2 Did the Council take account of its Community Plan The Community Plan contains a cross cutting theme; “Equality between places, communities, groupings and cultures. The actions delivered through Community Planning must be accessible for all to benefit from, with consideration given to those most vulnerable and those with disabilities”.</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 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>Currently, demand from people with a disability who wish to own their own homes cannot readily be met, as there is no requirement for market housing to provide Lifetime Homes or wheelchair accessible homes. Accessible housing will allow older and disabled people to feel safe and secure, and to be fully integrated within the community. This is especially</p>

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			<p>important in an aging society.</p> <p>We believe accessible housing policies can help achieve regional policy objectives. One of the eight aims of the RDS is to “Promote development which improves the health and well-being of communities”. Regional guidance also aims to strengthen community cohesion by encouraging mixed housing development to allow heterogeneous populations to live together, reducing social isolation, and creating a sense of belonging to everyone.</p> <p>The SPPS identifies an important factor of sustainable development, in relation to the needs and aspirations of our society, is to facilitate sustainable housing growth in response to changing housing need and to progress policies, plans and proposals that can improve the health and wellbeing of local communities, helping to build a strong and shared society.</p> <p>The SPPS contains five core-planning principles, one of which is Improving Health and Wellbeing, which states that when plan making and decision-making, planning authorities should contribute positively to health and wellbeing. This includes providing for safe and secure age-friendly environments, and by supporting the delivery of homes to meet the full range of housing needs. This core principle also acknowledges how a building can be designed to have a positive impact on how people feel. The core principle to Create and Enhance Shared Space recognises that offering a variety of house types, sizes, and tenures will help meet the diverse needs of the community and provide opportunities for shared and balanced communities. An additional core principle Supporting Good Design and Wellbeing states that ‘good design can change lives... for the better’; and can promote healthier living, accessibility, and inclusivity.</p>

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			<p>An increased provision of Lifetime Homes and wheelchair units can contribute to achieving outcomes of the draft Programme for Government's Delivery Plan, (October 2016). These include:</p> <ul style="list-style-type: none"> • We live long and healthy lives; • We care for others and help those in need; • We are a shared society which respects diversity; and • We connect people and opportunities through our infrastructure. <p>Indicators are set out under each outcome. Three related indicators are:</p> <ul style="list-style-type: none"> • Improving the quality of life for people with disabilities and their families; • The number of households in housing stress; and • The gap between the number of houses we need and the number of houses we have.
HOU3	7.41 – 7.43	Support	The Housing Executive supports the criteria in relation to residential extensions.
HOU 4	7.44 - 7.47	Support	We support this policy, which is in line with Policy LC 2 of PPS 7.
TH1	7.48 – 7.59	Representation	The Housing Executive would like to see an option, as contained in HS3 of PPS 12, "that where a transit site or a serviced site cannot be accommodated within a settlement, a site adjoining, or in close proximity to a settlement; another acceptable site in the countryside should be considered".
CT1	8.14 -	Representation	We would like to see further criteria that new development should not contribute to "build

Policy	Paragraph	Representation / Support / Objection	Comments
	8.30		<p>up" in the countryside.</p> <p>In addition, we would also like to see the reference to new planting in paragraph 8.20 restricted to native species. Some planting, which may be common in the area, may not be appropriate in a rural area, and native species can better sustain biodiversity.</p>
CT2	8.31- 8.63	Representation	<p>We support the Development in the Countryside policy as contained within the SPPS and believe that the Development Plan policy does not need to deviate from it. We believe that a relaxation in policy has a higher risk of being contrary to CT1 and being unsustainable.</p> <p>In relation to point (e), we believe that the dwelling on the farm should be visually linked or sited to cluster with existing buildings. We do not believe that there should be an exception based on the employment status of the applicant i.e. retiring farmer.</p> <p>The purpose of Dwelling in a Farm Cluster (f) seems to be to allow a dwelling, which does not meet the criteria in (e) Dwelling on a Farm, therefore, we would like to see the removal of (f), as this conflicts with (e).</p> <p>We believe that policy (g) negates the need for policy (h). We believe that 'a carer' needs to be narrowly defined and should exclude childcare.</p> <p>We believe occupancy conditions should apply to all farm dwellings and to retiring farmers in order to ensure that properties meet the housing needs of farmers, and are not built with the intention of selling the property on within a short period.</p>

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			<p>In the Justification & Amplification for replacement dwellings we would like to see, the statement within the SPPS included “Replacement dwellings must not have a visual impact significantly greater than the existing building”.</p> <p>We understand that as these units constitute dwellings in the open countryside and if the 40% of the HGI approval rate is reached, as set out in SPF 6, even if an application complies with the criteria outlined in CT2, an application under this policy may not be accepted.</p>
CT3	70	Support	<p>We welcome the retention of a rural exceptions policy where a need has been identified by the Housing Executive. While the Housing Executive prefers affordable housing to be delivered through planned development, the inclusion of CT3 will provide flexibly should need rise over the Plan period. We would like the policy to refer to affordable housing (social and intermediate housing).</p>
CT4	71	Objection	<p>We do not support the designation of Dispersed Rural Communities (DRCs) as we do not consider these as sustainable development.</p> <p>We believe that the policy fails the following soundness tests:</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy. The RDS promotes sustainable development. It includes strategic aims to improve connectivity, promote health and well-being, protect, and enhance the environment, to

Policy	Paragraph	Representation / Support / Objection	Comments
			<p>reduce our carbon footprint and to facilitate adaptation to climate change.</p> <ul style="list-style-type: none"> C3 Did the Council take account of policy and guidance issued by the Department The Planning Act (Northern Ireland) 2011, the SPPS, and the Sustainable Development Strategy all include a key aim to further sustainable development. <p>The reasons for our objections to DRCs are mentioned in our response to SPF 7, above. In addition, we believe this is contrary to criteria in CT1 to cluster, consolidate, and group new development to mitigate adverse impacts upon rural amenity and scenic landscapes and landscape character arising from sporadic development and CT 2 to avoid urban sprawl. We note that paragraph 8.24 states the principle of drawing a settlement limit it so promote and contain new development to maintain a clear distinction between the built up area and surrounding countryside. Proposals that would mar this distinction or create urban sprawl will therefore be unacceptable.</p> <p>We would also like to see further information on how applicants will be assessed against the criteria that they can make “a substantial economic or social contribution to that community”.</p>
CT5	8.71 – 8.72	Support	The Housing Executive supports the proposed wording and approach for Policy CT5 Temporary Caravans/Mobile Homes.
COY 1	9.18 – 9.19	Support	The Housing Executive supports the proposals and the suggested wording of Policy COY1 – Community Uses. However, we would also like to note that beneficial health outcomes are

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			<p>not only supported by development and access to health facilities, but can be supported by the form of development, inclusive design in homes, buildings and surrounding places, dedicated spaces for active travel and access to open space.</p> <p>In addition, we believe a planning gain/developer contribution policy should be included within this section to provide community facilities, as proposed in the General Principles Planning Policy, GP1.</p>
UD1	10.8 - 10.15	Support	<p>The Housing Executive welcomes the acknowledgement that a place making approach can lead to successful places. This links to urban design, as place making advocates that buildings should not be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area. We believe the Policy requirement for the submission of design and access statements with applications and the proposal to produce design guidance for settlements will help foster place making and high quality design.</p>
OS1	11.12 – 11.19	Support	<p>The Housing Executive 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 and encourages community cohesion.</p> <p>However, in some circumstances, the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. The Housing Executive therefore strongly welcomes the acknowledgement in paragraph 11.19 that</p>

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			affordable housing is a “substantial community benefit”.
OS2, OS3 and OS4	11.20 – 11.39	Support	The Housing Executive supports open space polices to protect river corridors, for and for outdoor and indoor recreational facilities.
Economic Policies – Creating Jobs and Prosperity			
ECON1 – ECON4	12.13 - 12.30	Support	The Housing Executive is generally supportive of the dPS’s economic policies. We would like to see barrier free employment, and therefore, would like priority given in the identification of employment land, which is accessible by public transport. We also would like to see a sequential approach used to the identify employment land, which directs employment to the Hubs and local towns first.
RE1 – RE7	13.17 – 13.47	Support	The Housing Executive supports the retail hierarchy and policies and the town centre first approach. This will promote accessible retail and services, an important element of sustainable communities. In particular, we welcome the reference to housing as an acceptable use in town centres as this can help promote the vitality and viability of centres. Living over the shops and tourism facilities can also aid regeneration, when located town centres.
Environmental Policies – Protecting Heritage and Providing Infrastructure			
HE 1 – HE 16, SCA 1, & NH 1 – NH 6	17.1 – 18.22	Support	The Housing Executive supports policies that protect our built and natural environment and heritage. These will help promote and maintain a sense of place and wellbeing for residents and visitors.

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FLD1-FLD 5	19.13 – 19.41	Support	<p>Flooding causes a detrimental effect on people’s health and wellbeing, on the local environment and the economy. We welcome policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We encourage the use of Sustainable Urban Drainage Systems and believe that it is important that drainage assessments be provided for all new residential developments within potential flood risk areas.</p>
RNW1	22.10 – 22.45	Support	<p>The Housing Executive, as the Home Energy Conservation Authority supports maximising the opportunities to develop local renewable energy schemes, and that new developments are resource and energy efficient. We believe that energy efficiency measures and renewable energy schemes, in residential areas can reduce fuel poverty for local people, thereby increasing health and wellbeing.</p>
TRAN1 -4	23.9 – 23.20	Representation	<p>The Housing Executive would like to see more emphasis given to sustainable transport methods such as active travel and public transport. We also support the integration of transport and patterns of development, which reduce the need to travel, to promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft PfG delivery plans. Therefore, we would like to see a SPF with a strong focus on development within settlement limits.</p> <p>The Housing Executive agrees with the policy approach to protect disused transport routes</p>

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			<p>including a network of green and blue infrastructure. Policies, which support active travel, can improve health and wellbeing. Disused Transport Routes or Community Greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated.</p>
Monitoring			
Monitoring of Our Plan	24.1 - 24.8	Representation	<p>We welcome the draft Plan including detailed information on Monitoring arrangements. However, in order to comply with SPF 6, we believe that housing approvals in the open countryside should be included as an indicator, to ensure they do not exceed 40%.</p> <p>We welcome the inclusion of the number of affordable houses delivered as a measure, however we would like the Housing Executive's Housing Needs Assessment also included as a measure to demonstrate need trends, whether there is increasing or decreasing need, over the monitoring period, which may need to trigger a Plan Amendment.</p>