
Mr Dermot O'Kane,
Belfast Planning Service,
Cecil Ward Building,
4-10 Linenhall Street,
Belfast,
BT2 8BP

13th November 2018

Dear Mr O'Kane

The Housing Executive strongly welcomes Belfast's Local Development Plan (LDP) draft Plan Strategy (dPS). We support the Vision, Strategic Aims, Objectives and Policies contained within the dPS, and believe these will provide a positive direction for the development and growth of Belfast, to 2035. We recognise and welcome the ambition of the dPS, which introduces policies new to Northern Ireland, and we believe these will be central to promoting sustainable development, sustainable communities and place making. As the Council has engaged with the Housing Executive, and as we were a member of an LDP housing working group, we are largely content with the housing policy aims and housing policy within the dPS. This working group was valuable to assess policy options and to consider issues from other stakeholders. We believe this approach has led to comprehensive and sound housing policies.

We especially welcome the dPS housing aims to 'nurture the development of balanced local communities by achieving an appropriate mix of house types, sizes and tenures' and to 'secure mixed tenure housing developments'. We believe that these aims, with the draft housing policies, will be a principle way to achieve the Regional Development Strategy's (RDS) objectives to meet the housing needs of the whole community, including affordable and special needs housing and to encourage mixed housing development as a way to strengthen community cohesion. We would also urge that the Council should consider working with us to adopt an 'active stock management' approach, to ensure the most effective provision of housing.

We understand the Council will be producing supplementary planning guidance for housing policies, to accompany the LDP, including guidance on affordable housing, adaptable and accessible accommodation, density, housing mix, student housing, residential design and specialist residential accommodation. We look forward to the publication of this guidance, and we would welcome an opportunity to provide advice and information to assist in its preparation and use.

In addition to supporting the dPS's statements on housing, and reflecting our wider mandate, we also wish to strongly support other policies on spatial strategy, place making, community cohesion, regeneration and social/community enterprise. We are keen to work with the Council to develop these aspects of policy and strategy.

As we strongly support the Policies within the dPS, we believe that these should be implemented at present, on prematurity grounds. This is supported by the Strategic Planning Policy Statement (SPPS) and the Joint Ministerial Statement (JMS) 'Development Plans and Implementation of the Regional Development Strategy', which we believe remains a material consideration in the determination of planning applications. Please see our detailed consideration of the dPS policies, enclosed.

I trust this information is of assistance,

Yours sincerely,



Appendix 1

Housing Executive Response to the Belfast Local Development Plan Draft Plan Strategy

As we strongly support the Policies within the dPS, we believe that these should be implemented now on prematurity grounds. This is supported by the Strategic Planning Policy Statement (SPPS), and the Joint Ministerial Statement (JMS) ‘Development Plans and Implementation of the Regional Development Strategy’, which we believe remains a material consideration in the determination of planning applications.

Previous Development Plans have applied prematurity post publication of draft Plans. While we understand, there is no presumption that an 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.

We believe that the dPS should be a material consideration in the determination of planning applications in Belfast, as the extant plans in Belfast and Lisburn, are now out of date. These extant Plans include the Belfast Urban Plan 2001, the Lisburn Area Plan 2001, Lagan Valley Regional Park Local Plan 2005, the Belfast Harbour Local Area Plan 1990-2005 and the North Down and Ards Area Plan 1984-1995. These Plans were prepared before the publication of the RDS and the enactment of the Planning Act (Northern Ireland) 2011. Therefore, unlike the dPS, these Plans did not need to adhere to the Planning Act, which provides a statutory duty to exercise functions with an objective of furthering sustainable development (Section 5) or take account of the RDS, and its aim to ‘promote development which improves the health and wellbeing of citizens’. This aim directly relates to housing.

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Introduction			
Introduction	N/A	Representation	We would like to see further information included in this section on how prematurity would be applied.
Vision, aims and objectives			
Vision	4.1.1	Support	<p>The Housing Executive supports the Vision and in particular the statement <i>‘Thriving socially inclusive well connected neighbourhoods that encourage a healthy active lifestyle with well-designed homes where people love to live’</i>.</p> <p>The Housing Executive believes that all new housing developments should support the creation of sustainable and balanced communities. A sustainable community is one</p>

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			<p>where people want to live and work, both now and in the future. Below, we identify key components of a sustainable community, based on the Bristol Accord¹, which states that sustainable communities are:</p> <ul style="list-style-type: none"> • Inclusive and safe; • Well connected; • Well serviced; • Environmentally sensitive; • Economically successful; • Well designed and built; • Fair for everyone; and • Well run.
Strategic aims and objectives	4.2.3	Support	<p><u>Shaping a Liveable Place</u></p> <p>The Housing Executive supports the Strategic Aims and Objectives under this section. We welcome the aim to develop sustainable neighbourhoods; which is also a key aim of the Housing Executive. The Housing Executive supports the seven objectives, in particular we strongly support:</p> <ul style="list-style-type: none"> • <i>'to address current and future residential needs through ensuring the supply of suitable land to meet future requirements for new socially inclusive residential development where there is an appropriate type, size, density, tenure and mix to fulfil all the needs of the population.'</i> • <i>'to promote collaborative cross-community projects that utilise derelict interface sites that contribute to the integration of neighbourhoods and the development of shared spaces to build social cohesion.'</i> <p>The Housing Executive supports this policy as it closely reflects our 'People, Property and Place' approach to our work. This means that we take a place making approach to the development and management of housing stock, which is tailored to local communities and their needs and aspirations.</p> <p><u>Creating a Vibrant Economy</u></p> <p>We support the aim and objectives to support Belfast's economy. We strongly welcome the objective:</p> <ul style="list-style-type: none"> • <i>'to support the continued regeneration of</i>

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			<p><i>disadvantaged areas, to facilitate well linked high quality mixed developments, designed to create diverse communities, to break down the social and sectarian divisions of existing city neighbourhoods.'</i></p> <p><u>Building a Smart Connected and Resilient Place</u> We agree with the aims and objectives, which include:</p> <ul style="list-style-type: none"> • <i>'adapt for the potential implications of environmental changes through management of development within areas of risk and designing new development to reduce future risk from flooding.'</i> <p><u>Promoting a Green and Active Place</u> We support the aims and objectives, including:</p> <ul style="list-style-type: none"> • <i>'to support healthy lifestyles by managing existing open spaces and ensuring sufficient land availability for the development of blue and green infrastructure network to encourage walking, cycling, accessible play, allotments, sports and recreation opportunities.'</i>
Strategic Policies			
SP1 - Growth Strategy	5.1	Support	The Housing Executive recognises the ambition of the growth strategy, which aims to provide 46,000 additional jobs, to grow the population by 66,000 people and to accommodate 31,600 additional homes. We believe this will help achieve the Regional Development Strategy (RDS) objective to grow the City of Belfast.
SP2 -Sustainable Development	5.2	Support	<p>We believe the three pillars of sustainable development, the economy, social considerations and the environment are interlinked and support each other, and therefore, we support a balanced approach between the three elements, within the LDP.</p> <p>Linked to sustainable development, is the promotion of sustainable communities. The Housing Executive actively works to develop and maintain sustainable communities, through community involvement, cohesion and safety programmes. We also build community capacity through our housing network forum.</p>

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SP3 – Improving health and wellbeing	5.3	Support	The Housing Executive welcomes this policy, which relates to improving health. It is important that health is considered as part of the planning process and that health impacts are considered in decision-making. This will help achieve the Belfast Agenda aims regarding health and wellbeing outcomes.
SP4 – Community cohesion and good relations	5.4	Support	The Housing Executive supports this policy to make a positive contribution to community cohesion and good relations. The Housing Executive promotes 'Good Relations' and shared housing as a key objective, where it is practicable, desirable and safe. We believe that the Plan Strategy's housing policies to support residential developments to contain mixed tenure, mixed-use, mixed type and size of housing, including wheelchair standard units along with open space and community infrastructure, can promote balanced communities and support shared, inclusive and cohesive communities. In addition, the Housing Executive actively seeks opportunities to provide new shared housing developments. These are best developed through collaborative working between and within communities, agencies and individuals. Shared housing depends ultimately on trust and safety and, the Housing Executive actively aims to help build trust, and safety, through good relations programmes. Therefore, the Housing Executive would welcome working with the Council in the delivery of this policy.
SP5 – Positive placemaking	5.5	Support	The Housing Executive advocates a placemaking approach to development. Placemaking is a people centred approach to the planning, design and management of places to strengthen the connections between people and the places they share. We believe that community involvement in the development process will enhance design proposals, provide a sense of place, attract investment and improve well-being by providing an opportunity to shape the development of a place to ensure that it meets community needs. The use of models, such as the Place Standard Tool ² in Scotland can be used to help

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			structure community involvement, as well as aiding planners to take a place making approach.
SP6 - Environmental resilience	5.6	Support	The Housing Executive, as the Home Energy Conservation Authority supports the objective to 'maximise the opportunity to develop local renewable energy schemes, ensure that new developments are resource and energy efficient and direct development away from areas where climate-related hazards are already present or predicted, such as flood plains'. 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.
SP7 – Connectivity	5.7	Support	The Housing Executive welcomes this policy, as we believe that new developments should be concentrated in locations with good access to public transport, walking and cycling facilities. As well as contributing to the reduction of greenhouse gases, promoting active lifestyles, key aims in the SPPS, a reduction in car use can lead to communities that are more cohesive. Research shows that as people travel without cars, they interact with neighbours and use local shops and facilities. Developments, 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 will help support better health outcomes.
SP8 – Green and blue infrastructure network	5.8	Support	The Housing Executive agrees with the policy approach to protect and provide open space including a network of green and blue infrastructure. Policies, which support active travel, can improve health and wellbeing. 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.

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Spatial Development Strategy			
SD1 – Settlement hierarchy	6.1	Support	We support the identification of Belfast as a Principal City, with, Edenderry, Hannahstown and Loughview also identified as small settlements, allowing opportunities for development of an appropriate scale, in these areas.
SD2 – Settlement Areas	6.2	Support	We support the identified settlement areas, based on character and functions. We support distinct development policies for each of the settlement areas, protecting local distinctiveness and a sense of place.
SD3 - City centre	6.3	Support	<p>We strongly welcome the recognition new residential development will be supported to help contribute to the creation of a compact and vibrant city centre.</p> <p>The Housing Executive strongly supports City Centre living, as we believe that City Centre living in Belfast, can provide benefits, including:</p> <ul style="list-style-type: none"> • increasing the supply of housing units; • revitalising the City Centre; • improving security for people and businesses; • providing additional custom for businesses; • connecting people to services; • reducing isolation; • reducing the need for greenfield development; and • reducing the need to travel. <p>It will be important in decision-making that the facilities in the area are considered, in order to support high living standards within the City Centre, including open space and recreation, health, and education and community services. We believe that adequate and well-designed green open space is important in a high-density living environment. We also believe that</p>

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			environmental improvements, high quality urban design, which is pedestrian friendly, will encourage City living.
Shaping a liveable place			
HOU1 – Accommodation new homes	7.1.6 - 7.1.11	Support	<p>We support the policy and the quantity and generally the proposed distribution of housing units. However we would like to see a number of additional dwellings for Hannahstown to meet affordable housing need as at June 2018 there were 20 households on the waiting list and no allocations were made in the previous year.</p> <p>We would like to see prematurity applied. If it is not applied, there may be an increase in planning applications in order to avoid policy provisions, which may be in place post-plan adoption, prejudicing the ability of the plan to achieve the strategic objectives and aims, for example to address current and future residential needs.</p>
HOU2 – Windfall housing	7.1.12 - 7.1.14	Support	<p>We welcome planned new development in line with a place making approach. We understand that traditionally there has been a high proportion of housing development on windfall sites. Therefore, we welcome a windfall policy, which includes policy to ensure that sustainable development standards are met and to ensure that there is sufficient infrastructure capacity to support development.</p>
HOU3 – Protection of existing residential accommodation	7.1.15 - 7.1.19	Support	<p>We support the presumption to retain residential stock as this will ensure a supply of permanent residential stock. We support an exception for community infrastructure, which can help support sustainable communities.</p> <p>However, it should be noted that the Housing Executive has prepared a strategy for its tower blocks as part of our Asset Management Strategy. This strategy determined that option appraisals should be carried out for each block given the various issues around investment needs, management and maintenance costs and housing demand, which could result in retention, demolition, transfer or sale of these accommodation blocks. The implication of this</p>

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			<p>Strategy is while land may be made available for new housing development, it may also result in the need for additional sites to meet the total housing need requirement caused by demolition, should this approach be approved.</p>
<p>HOU4 – Density of residential development</p>	<p>7.1.20 - 7.1.24</p>	<p>Support</p>	<p>We support high density living in appropriate locations which respect the character of the local area. High density residential developments can achieve sustainable development and compact urban forms, reducing the need for greenfield development and the need to travel. However it is important that there is adequate open space and amenity provision of good quality, in high density locations.</p> <p>In addition, we would like to see some flexibility to provide lower densities, particularly in inner city Belfast. We note that social housing developments tend to be provided at higher densities than market housing, and are approximately 35 dph. We believe that a lot of the potential for delivery of affordable housing will be within inner city Belfast, and we would like to be able to set a density, which best meets the need, especially for family households.</p>
<p>HOU5 – Affordable housing</p>	<p>7.1.25 – 7.1.39</p>	<p>Support</p>	<p>We strongly support the affordable housing policy which meets the aims of the RDS, SPPS, and the LDP of providing a mix of tenures, to meet need and to create cohesive and balanced communities.</p> <p>We support the threshold of five or more dwelling units and the minimum 20% requirement for affordable housing to 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 development management policy approach will ensure mixed tenure development and sustainable communities. In addition, 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</p>

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			<p>deprivation.</p> <p>We welcome that the policy states that development should be tenure blind and integrated with market housing. This will ensure that there is a genuine housing mix, promoting more cohesive communities.</p> <p>We agree that the affordable housing provision will be secured by section 76 planning agreements.</p> <p>We support the statement in paragraph 7.1.26 that in some instances there may be the potential for a higher proportion of affordable housing and that the proportion of affordable housing can be adjusted through a key site requirement within the local policies plan, especially in areas where there is an acute housing need.</p> <p>We would like to see a statement in the policy box that the Housing Executive will determine the mix (social/intermediate and size) of affordable housing required.</p> <p>While the plan mentions financial availability, we do not believe that this should be a significant issue as the affordable housing will be fully funded and at this stage, does not require a developer contribution.</p> <p>We support the definition of affordable housing as defined by the SPPS. We understand the number of intermediate products may be expanded in the future. We would like any change to the definition to include the following criteria:</p> <ul style="list-style-type: none"> • the affordable housing is delivered by a registered housing association; • the affordable housing is allocated by a housing association to eligible households who cannot access market housing; and • the affordable housing units should remain at an affordable price for future eligible households or if these restrictions are lifted, the subsidy shall be recycled for alternative affordable housing provision.

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			<p>We welcome that it is stated that the Housing Executive has a role in the identification of need.</p> <p>We believe that the implementation of the policy will be clarified by the supplementary planning guidance mentioned at paragraph 7.1.39 and the Housing Executive is willing to contribute to the development of this. We would suggest that the guidance outlines the following:</p> <ul style="list-style-type: none"> • Affordable housing should be designed to the standards contained within DfC's Housing Association Guide; • How the alternative approaches contained in paragraph 7.1.37 will be applied; • The roles of the Council, Housing Associations, and the Housing Executive are set out; and • Best practice in the application process is identified. <p>We have some concerns regarding the alternatives set out in 7.1.37, which includes providing affordable housing on an alternative site in the local area, or the provision of commuted sums. If viability is demonstrated to be an issue, our preference would be for the proportions of affordable housing to be lowered to below 20%. We believe that achieving affordable housing on an alternative site can be difficult. It would need to be stated in guidance that the alternative site should be delivered at the same time as the original site and be able to accommodate its own affordable housing requirement as well as the requirement from the original site. It must be ensured that this does not result in a concentration of affordable housing which minimises the potential for mixed tenure development and balanced and sustainable communities. We have strong reservations about allowing a commuted sum to be provided instead of affordable housing units. The primary purpose of policy HOU5 is to provide access to land for affordable housing.</p> <p>We would like to the plan to contain a statement that a developer contribution may be required in</p>

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			the future, resulting from a plan review.
HOU6 – Housing mix	7.1.40 - 7.1.45	Support	<p>We support HOU 6 as it promotes choice, can meet a range of need, and therefore create a balanced community. We believe that the character of the local area may also be a factor in the determination of a housing mix.</p> <p>To operate an active stock management approach will require sufficient house types, form and size to accommodate a variety of household needs across age and health requirements.</p>
HOU7 – Adaptable and accessible accommodation	7.1.46 – 7.1.52	Support	<p>We support this policy.</p> <p>The quality of our homes has a significant influence on our health, happiness, confidence, social life, relationships with our families and general well-being. For those with mobility problems, who may be more likely to spend a larger proportion of their time at home, it is essential that their home enables them to live as safely, healthily and as independently as possible.</p> <p>Adequate housing is a human right, essential to human dignity, security and wellbeing. The UN’s Committee on Economic, Social and Cultural Rights, states that for housing to be adequate, a number of criteria need to be met, including ‘Accessibility’. Housing is considered inadequate if the specific needs of disadvantaged and marginalized groups are not taken into account.</p> <p>Accessible housing is defined as housing that is designed to Lifetime Home standards or wheelchair standards as set out in Department for Communities’ ‘Housing Association Guide’, found at the following link: https://www.communities-ni.gov.uk/collections/housing-association-guide. Standards for Lifetime Homes and wheelchair housing are already in place in Northern Ireland for social housing developments. In addition, we operate an active stock management approach to match people to accommodation, which best meets, their needs. We believe that the Plan could be stronger on the need for active stock management of all housing. Belfast planning may want to look at other cities that have been able to</p>

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			<p>'better size and fit' housing types for the changing democratic pattern.</p> <p>However, we believe there is a lack of accessible housing, for households who wish to live independently in private sector accommodation.</p> <p><u>Lifetime Homes</u></p> <p>Lifetime Home standards were developed to ensure that homes are accessible and inclusive, to support the changing needs of individuals and families at different stages of life. Lifetime Homes are flexible, designed to create better living environments for everyone, from raising children, coping with illness or dealing with reduced mobility in later life, allowing people to remain independently for longer in their own homes. The development of homes within these standards is especially important in the context of an aging population and can prevent the need for costly and disruptive adaptations.</p> <p>Features of "Lifetime Homes" ensure that your home can develop as your needs change.</p> <p>Bringing Lifetime Homes design into the general housing stock should, over time, allow older people to stay in their own homes for longer, reduce the need for home adaptations and give greater choice to disabled people who cannot achieve independent living due to lack of suitable housing.</p> <p><u>Wheelchair Housing</u></p> <p>Standard wheelchair housing is primarily designed to aid independent living for people with physical disabilities and those who also need a wheelchair for day to day mobility and require the larger areas and circulation areas afforded by this accommodation type.</p> <p>Housing Associations already cater for identified wheelchair need in their social housing planning applications. However, demand from people with a disability who wish to own their own homes, or rent privately, cannot readily be met, as there is no requirement for market housing to provide</p>

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			<p>wheelchair accessible homes. In addition, there are increasing numbers with complex disabilities living in domestic settings due to:</p> <ul style="list-style-type: none"> • The increased demographics of age and disability; • Medical advancements with people surviving trauma; and • Legislative & policy changes e.g. 'Care in the Community'. <p>Wheelchair standard homes support independent living, promote an inclusive society and reduce the need for costly and disruptive adaptations. This policy can increase accessible housing stock, addressing an undersupply of appropriate housing for all, in the long term.</p>
HOU8 – Specialist residential accommodation	7.1.53 - 7.1.56	Support	We welcome this policy to meet the range of housing need. Specialist residential accommodation is need for those who cannot live independently in their own home. We especially support developing special needs housing such as extracare and dementia friendly homes, to avoid the cost and disruption of adaptations.
HOU9 – Traveller accommodation	7.1.57 - 7.1.60	Support	We support the proposed policy to ensure that the needs of travellers are accommodated in the LDP.
HOU10 – Housing management areas (HMAs)	7.1.61 – 7.1.76	Support	We support a housing management area policy. HMO's can help meet the need for affordable housing, especially to younger and single person households. However we believe the management of these units is important to ensure that there is a balance of housing stock in the area.
HOU11 – Intensive housing nodes	7.1.77 - 7.1.82	Support	We support the proposed policy. We agree that in suitable locations, it may be appropriate to have higher percentages of HMOs to help meet needs.
HOU12 – Large scale purpose built managed student accommodation (PBMSA)	7.1.83 - 7.1.59	Support	The Housing Executive supports purpose built managed student accommodation to avoid concentrations of students in established residential areas. We also believe that the management of student accommodation may reduce the potential for anti-social behaviour as well as providing a safe environment for students.

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			However, some flexibility could be applied to the requirement of a minimum of 200 occupants, if there is evidence that full time management arrangement can be financed for accommodation of less than 200 occupants.
HOU13 – Short-term let accommodation	7.1.83 – 7.1.89	Support	As there is increasing demand for short term let accommodation, we welcome this policy, to better plan its development. This policy will also support the provision of good quality accommodation for tourists.
DES1 – Principles of urban design	7.2.6 - 7.2.20	Support	We support the policy and all the principles of urban design. However, we would like to see the policy reinforce the importance of community involvement over simple consultation and to encourage planning applications to engage with local people beyond the required statement of community involvement. It is essential that urban design is not tick box exercise but takes a holistic place making approach. Individual design issues should not detract from the overall quality and importance of places.
DES2 – Masterplanning approach for major development	7.2.21 – 7.2.27	Support	We support the master planning approach for major development. This supports the principle of place making. With regards to point g, we would like to see that riverside developments will not prohibit public walkways alongside the Lagan.
DES3 – Tall buildings	7.2.28 – 7.2.31	Support	We support the design criteria for tall buildings, as by their nature they will have a significant impact on the visual aesthetic and character of the city. Tall buildings can be important at gateways to provide legibility to an area. Design Criteria for tall buildings should also take into account the findings of the ‘Independent Reference Group’ into fire safety in Housing Executive tower blocks, contained an a report found at the following link: https://www.nihe.gov.uk/fire_safety_-_findings_report_part_1.pdf
RD1 – New residential	7.3.3 - 7.3.17	Support	We support the policy. This will help ensure the development of high quality residential

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developments			environments.
RD2 – Residential extensions and alterations	7.3.18 - 7.3.22	Support	We support the policy. It will help ensure the protection of the amenity of existing residential areas.
RD3 – Conversion or sub-division of existing buildings for residential use	7.3.23 – 7,3.30	Support	<p>We support this policy and believe this links with the LDP Built Heritage objectives to preserve, maintain and enhance Belfast’s historic environment for current and future inhabitants. Belfast’s industrial heritage means there are underused and vacant industrial premises, which have the potential to become redevelopment nodes through adaptive reuse. This is a sustainable approach can be used to meet current housing needs while preserving an important element of Belfast’s identity.</p> <p>We acknowledge that this policy will facilitate living over the shops (LOTS), which we support. LOTS can contribute to an increased supply of housing units, provide additional customers for businesses, including at night-time, leading to increased vitality in the area.</p>
BH1 – BH 6	7.4	Support	We support the built heritage policies as they will protect and enhance a sense of place.
CGR1 CGR2	7.5	Support	<p>The Housing Executive strongly welcomes these policies as part of a ‘whole of place, whole of community’ approach. The Housing Executive promotes ‘Good Relations’ and shared housing as a key objective, where it is practicable, desirable and safe. Good relations and community cohesion are best promoted through collaborative working between and within communities, agencies and individuals. Cohesive communities ultimately depend on trust and safety and the Housing Executive actively aims to help build trust and safety, through good relations programme such as the Race Relations Policy, Building Relations in Communities programme and Together Building United Communities (TBUC).</p> <p>As previously stated, the Housing Executive believes that mixed tenure, mixed-use, mixed type and size of housing, including wheelchair standard units along with open space and community infrastructure, can promote balanced</p>

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			<p>communities supporting shared, inclusive and cohesive communities.</p> <p>Collaborative working on these issues can be supported through the community planning process and the Belfast Agenda.</p>
HC1 – Promoting healthy communities	7.6	Support	<p>The Housing Executive also recognises the importance of considering health as part of the planning process and that believes that health impacts should be considered in planning applications. We strongly agree that the LDP can promote a healthy city. We consider that policies, which support active travel and provide access to open space, can improve health and wellbeing. We also believe that additional measures could be included to promote a healthy community, for example by reducing traffic and congestion which has many negative effects on health and wellbeing and through the promotion of accessible housing and neighbourhoods.</p> <p>Local Plans in England have adopted policies which aim to improve the health of communities which promote active travel and open space to reduce obesity, how well people live at all stages of their life, and to include Health Impact Assessments for major development. We welcome that the Belfast LDP has adopted a similar approach.</p>
CI1 – Community Infrastructure	7.7	Support	<p>We support this policy. The Housing Executive believes community infrastructure is an important element of sustainable and high quality development, providing access for residents to important services and facilities. For new residential developments, the time lag between people moving into a development and the provision of community facilities should be minimised. Where possible, infrastructure, communal facilities and external spaces should be provided prior to new housing; this is a prerequisite to meeting the strategic policies set out in Chapter 5.</p> <p>In addition, we support a developer contribution policy, where the uplift in land values generated by the granting of planning permission should</p>

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			help fund additional infrastructure that is needed to contribute to the development of sustainable communities and their well-being.
Creating a vibrant economy			
EC1 – Delivering inclusive economic growth	8.1.8 – 8.1.12	Support	<p>The Housing Executive supports the ambition to grow the City’s economy. We strongly believe a growing economy needs to benefit local communities, to reduce poverty and deprivation and to increase wellbeing. We believe it is important that, within the LPP, barriers to accessing employment be removed in order to promote economic prosperity for local communities.</p> <p>We would like the Plan to recognise and provide opportunities for community and social enterprise. The Housing Executive continues to support this sector as it contributes to community cohesion, capacity building and sustainable development.</p>
EC2 – Employment land supply	8.1.13 – 8.1.20	Support	<p>The Housing Executive supports policy EC2 Employment land supply; we believe it is important to provide employment opportunities, which will support sustainable communities. We support the concentration of floor space within the City Centre, which will be accessible to communities across the city. We would like to see economic development land being directed to accessible locations, which can be easily reached by public transport.</p> <p>We support locations within the urban footprint, close to centres, or near major corridors, which are accessible by means other than the private car. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft Programme of Government delivery plans.</p>
EC3 – Major employment and strategic employment locations	8.1.21 – 8.1.25	Support	<p>The Housing Executive welcomes the inclusion of Major Employment Locations (MEL) and Strategic Employment Locations (SEL). We believe that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities.</p>

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			We support locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft Programme of Government delivery plans.
EC4 – Loss of zoned employment land	8.1.26 – 8.1.29	Support	The Housing Executive supports the protection of existing employment uses to support economic regeneration and employment growth.
RET1 – RET6	8.2.1 – 8.2.31	Support	<p>We support these policies.</p> <p>The Housing Executive welcomes a town centre first and sequential approach to retailing. Therefore, we support these principles, as contained in policy RET1, to establish a hierarchy of retail.</p> <p>The Housing Executive believes that the LDP should ensure that there is a mix of uses in centres and to meet local shopping demand in an accessible location. A mix of uses, including ‘pop up’ uses in vacant units and active frontages, will not only increase activity levels and footfall in an area but can also strengthen the resilience of a place against economic changes.</p> <p>We believe that vacancies in Belfast City Centre should be considered when considering new retail developments and we would to see mixed use within the city centre, which includes residential uses above ground floors.</p>
CC1 – Development opportunity sites	8.3.1 – 8.3.8	Support	The Housing Executive supports CC1, development opportunity sites. We support the use of design briefs and master planning for these brownfield areas and a mixed-use approach. We believe a mix of uses for each opportunity site should be clearly identified in KSRs within the LPP.
TLC4: evening and night-time economy	8.4.15 – 8.4.21	Support	The Housing Executive also believes residential development within or adjacent to the city centre can contribute to a night time economy. However, consideration must be given to the amenity of

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			residents.
Building a smart connected and resilient place			
ITU 4 – Renewable energy development	9.1	Support	<p>The Housing Executive supports Policy ITU 4 Renewable energy development.</p> <p>The Housing Executive would like the LPP to examine potential locations for renewable energy development. The LPP could indicate broad areas where certain types and scales of renewable energy projects (e.g. wind and solar farms) will be acceptable or unacceptable within the council area.</p> <p>We believe that this is a subject, which could benefit from supplementary guidance. Guidance for renewable energy could be incorporated in to the proposed new supplementary guidance on Mitigating Environmental Change. We believe the scope of this, could be wide, as it naturally links with energy and environmental policies on energy efficiency in buildings and actions to reduce in energy consumption by improving connectivity. Guidance can also be updated as technologies evolve.</p>
TRAN 1 – Active travel – walking and cycling	9.4.6 – 9.4.8	Support	<p>We note that data company Inrix (November 2016) reported that Belfast was one of the ten most congested cities in the UK. Congestion has negative environmental effects, such as increased air pollution, and adverse health effects, contributing to respiratory illness, depression, stress and premature death. The Housing Executive, therefore, supports Policy TRAN 1 Active travel – walking and cycling. Walking and cycling are sustainable transport policies, which can promote healthy life styles, minimise climate change and to improve connectivity for those who do not have access to a private car, including children and older people.</p> <p>We also support the integration of transport and patterns of development, which reduce the need to travel, as well as being more sustainable by reducing demand 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.</p>

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TRAN 2 – Creating an accessible environment	9.4.9 – 9.4.13	Support	We strongly support this Policy, which ensures equality of access for those with a disability and for those whose mobility is impaired. This will aid the promotion of an inclusive environment, allowing all people to connect with other people, employment opportunities, and services in their neighbourhood, and across the Belfast City.
TRAN 3 – Transport assessment TRAN 4 – Travel Plan	9.4.16 - 9.4.18	Support	The Housing Executive supports these policies, which promote transport as a key consideration that needs to be taken account of in the initial stages in the preparation of new developments.
TRAN 8 – TRAN 11	9.4.30 – 9.4.46	Support	<p>The Housing Executive supports these policies, which may limit parking spaces in some instances, making travelling by a private car less attractive. This will help encourage people to use sustainable methods of travel, such as walking, cycling and public transport.</p> <p>The Housing Executive supports a flexible approach to parking standards, within social housing developments, due to the lower levels of car ownership amongst social housing tenants.</p>
ENV1 – Environmental quality	9.5.12 – 9.5.22	Support	The Housing Executive welcomes this policy, which seeks to protect and minimise local communities and the environment from harmful effects that could arise from development. A high quality environment positively affects local communities health and wellbeing, encourages local economic investment leading to social and economic resilience.
ENV2 – Mitigating environmental change ENV3 – Adapting to environmental change	9.5.23 – 9.5.32	Support	<p>The Housing Executive supports these policies, where developers will be required to take consideration of environmental change. We strongly support Policy ENV 2, which seeks to promote energy efficiency design in buildings. We believe that the design of homes to nearly zero carbon standards will reduce housing costs and fuel poverty for households, which can have a detrimental effect on people’s health. This will promote a reduction in energy consumption, helping to reduce greenhouse gas emissions.</p> <p>As stated under Renewable Energy, we welcome</p>

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			supplementary planning guidance on 'Mitigating Environmental Change', and we believe this could incorporate information on renewable energy, which will be an important element in the mitigation of, and adaptation to environmental change.
ENV4 – Flood Risk	9.5.33 - 9.5.40	Support	Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. We welcome this policy, which deals with 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.
ENV5 – Sustainable drainage systems (SuDS)	9.5.41 – 9.5.47	Support	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.
Promoting a green and active place			
Policy GB1 – Green and blue infrastructure network	10.1.10 - 10.1.13	Support	The Housing Executive supports this policy as green and blue corridors provide environmental and ecological benefits, as well as providing recreational space for local communities, helping to promote active lifestyles and health and wellbeing. We note that community greenways and landscape wedges cross or adjoin local government boundaries; therefore, we would like to see agreement between councils on the maintenance and protection of these areas.
Policies OS1 - OS6	10.1.1 – 10.1.26	Support	<p>The Housing Executive strongly supports open space, especially green open space, which evidence shows brings significant benefits for people's health and wellbeing, helps to create a quality living environment, and promotes community cohesion. Therefore, we support the open space policies, for the provision and protection of open space.</p> <p>New development should usually conserve wildlife habitats, existing trees and quality vegetation. It should promote further biodiversity by providing open space with uncultivated areas and green</p>

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			<p>corridors. It should also consider of the creation of allotments and community gardens, which can encourage healthy lifestyles. Planting of native species in housing developments should also be encouraged, including the promotion of tree-lined streets. We also support the use of landscape strategies within residential developments to ensure that open space is adequate, well designed and is well integrated as part of the development.</p> <p>We strongly support the protection of existing open space; however, we also believe that there are circumstances where 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. Therefore the Housing Executive welcomes the exception contained within policy OS1 that in exceptional circumstances, the redevelopment of open space will be considered where it brings substantial community benefits. We would like affordable housing to be recognised as a substantial community benefit.</p> <p>The Housing Executive, in conjunction with the DOE, produced a Joint Protocol for the operation of the exception policy in PPS 8. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p> <p>We also note that the City Centre Regeneration and Investment Strategy stated there was a lack of green and open space within the city centre. We believe there is an opportunity to provide new open space within the Centre. We strongly believe that green open space is beneficial to people's health and wellbeing, and provides an attractive environment, further inviting residents to locate in the City Centre.</p>
Policy NH1 – Protection of natural heritage resources	10.2.8 - 10.2.11	Support	We support the protection of natural heritage resources to protect our environment, biodiversity and wildlife. We welcome the acknowledgement of how an attractive and species rich

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			environment can greatly improve peoples' health and wellbeing,
TRE1 – Trees	10.3.7 – 10.3.9	Support	The Housing Executive welcomes this policy to protect and increase the number of trees in Belfast. We believe that the provision of trees and green open space include can aid flood protection and water management, increase biodiversity, promote regeneration and investment and increase a sense of place. We also believe that native species trees should be promoted, as these can better support wildlife and biodiversity.
LC1 – LC4	10.4.10 - 1.4.22	Support	Belfast has a number of special landscapes, which provide a sense of place and provide an attractive environment for residents and visitors. We believe it is important these landscapes are protected from inappropriate development
DC1 – DC13	10.5.1 – 10.5.25	Support	<p>We note that the countryside policies in relation to housing reflect current policy within PPS 21, with the exception of CTY 5 'Social and Affordable Housing'.</p> <p>The Housing Executive recognises that the rural population in Belfast is relatively small and that housing development in the countryside is likely to be limited over the Plan period. In relation to housing in rural areas, the Housing Executive does not generally support housing development in the open countryside as this can isolate people from services and facilities, and increases a household's reliance on the private car. The Housing Executive, therefore, would prefer to see rural housing development within the settlement limits for Edenderry, Hannahstown and Loughview.</p> <p>Currently, there are 20 households on the waiting list for Hannahstown. In order to address affordable housing need, the Housing Executive prefers planned development and the allocation of land through a Key Site Requirement to provide land for affordable housing. We would like need monitored closely in rural settlements over the plan period and with the option to release further land as part of a plan review.</p>

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			The Housing Executive's Rural Strategy can be referred to in relation to development of rural areas. This Strategy aims to deliver a sustainable community approach, in conjunction with meeting the necessary legal/statutory obligations.