

Chloe Duddy

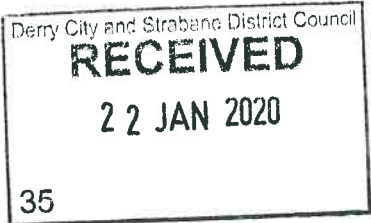
From: Blease, Catherine <Catherine.Blease@NIHE.GOV.UK>
Sent: 22 January 2020 16:31
To: Local Development Plan
Cc: McCollam, Joanne; Clarke, Louise (NIHE); Devine, Ruairi (NIHE)
Subject: Housing Executive response to Derry & Strabane Draft Plan Strategy
Attachments: NIHE D&S Response - Covering Letter.pdf; Appendix 3 Housing Executive Response to Derry and Strabane Local Development Plan Draft Plan Strategy (3).docx

Dear Sir or Madam,
 Please find the Housing Executive’s response and a covering letter to the draft Plan Strategy for Derry City and Strabane District Council. We would be grateful if you could provide a receipt of this response.
 Many thanks,
 Catherine

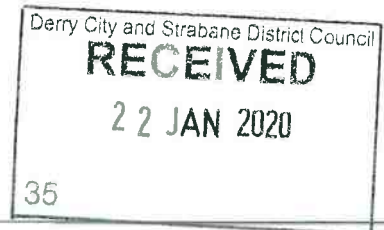
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***** IMPORTANT MESSAGE *****
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Proinsias McCaughey
Planning, LDP Team
County Hall
98 Strand Road
Derry
BT48 7NN



22nd January 2020

Dear Proinsias

The Housing Executive welcomes the publication of Derry City and Strabane District Council's Local Development Plan (LDP) draft Plan Strategy (dPS). We support the Vision and Strategic Objectives and many of the policies contained within the dPS, and believe these will provide a positive direction for the development and growth of Derry and Strabane, to 2032. We believe this policy document will be central to promoting sustainable development, sustainable communities and place making.

The Housing Executive as the Regional Housing Authority for Northern Ireland has a primary interest in housing strategy and policy. However, we believe housing is cross cutting, and has influence on, and is influenced by, economic, environmental and social issues. We therefore feel it is important that the Housing Executive submits comprehensive responses to draft Plan Strategies. The Housing Executive is also the Home Energy Conservation Authority and has interests in energy and renewable energy policy. To support the provision of sustainable communities, the Housing Executive undertakes significant regeneration work, often in partnership with Councils, government agencies and local communities. Regeneration in Derry City and Strabane has been supported by the Housing Executive's work in Community Planning, through our policies and strategies, and by allocating funding for Social Enterprise, Good Relations, Community Involvement, Community Cohesion, and Community Safety. We also have a Rural Strategy and Action Plan and an Environmental Policy. In addition, as the draft Plan Strategy is an important document, will be subject to an Independent Examination, and is a material consideration in planning decisions, the Housing Executive wishes to demonstrate support to draft Plan Strategy Policies that can further sustainable development.

We wish to respond fully to your draft Plan Strategy. While we understand an eight week consultation for a draft Plan Strategy is a legislative requirement, we are disappointed that

a "soft launch", as used by other Councils, was not considered. The inclusion of the Christmas holidays over the consultation period has meant, in effect, the eight week consultation period has been reduced. This may have restricted the ability for all respondents to scrutinise the draft Plan in sufficient detail; this is especially an issue for consultees, who, due to resource issues, already find the eight week consultation period challenging.

We support the LDP Vision, which aligns to the Community Plan vision and contains a reference to promoting well-being with equality of opportunity for all.

We support the Plan Objectives, in particular:

- "To provide for approximately 9,000 new, quality homes by 2032, in a balance of private and social housing, in a variety of formats designed to meet the needs of families, including single-parent families, small households, the elderly and disabled and single people, at sustainable locations accessible to community services, leisure and recreational facilities, for those people with and without a car. Housing schemes in Derry city, Strabane and the smaller settlements will require imaginative and innovative design, including mixed use schemes, and possibly mixed tenure, to ensure that they link into the existing urban fabric. Rural houses also need to be of quality design and siting, with a focus on sustainable development to provide homes to sustain vibrant rural communities;
- To recognise the needs of both growing families and carers of the elderly and disabled by accommodating development, this allows people to remain within their own communities while not adversely impacting on neighbours or the environment;
- To achieve balanced communities and to accommodate cultural differences between communities of all religious backgrounds, whilst promoting "shared spaces" to bring people together with equality of opportunity; and
- To close the gap in quality of life for those living in deprived areas."

However, the Housing Executive has concerns in relation to the proposed affordable housing policy, HOU 5. Policy HOU 5 requires a 10% proportion of affordable housing in developments of 10 units or more, or of 0.5 hectares or more. However, due to the high housing need within Derry and Strabane, with an affordable housing need of 4,750 units, equating to just over 50% of the 9,000 unit housing growth proposed over the Plan period, we believe the 10% cannot meet an adequate proportion of affordable housing need, including the need of households in housing stress. A higher proportion of affordable housing would better meet housing need and provide more affordable housing within a mixed tenure context. We would like to see changes to HOU 5, in order that the range of housing need, including affordable housing, can be effectively addressed, as required by regional planning policy and, therefore, we are objecting to the HOU 5 in its current form.

While our response includes an objection in relation to HOU 5, we would welcome discussing this with Council to explain our concerns and, potentially, agree a joint position before an Independent Examination. In addition, we would like an opportunity to assist Council and provide information on how, in our opinion, Policy HOU5 can be best implemented.

As we strongly support many of the Policies within the dPS, we believe that these should be implemented at present, on prematurity grounds. This is supported by the Strategic Planning Policy Statement (SPPS) and the Joint Ministerial Statement (JMS) 'Development Plans and Implementation of the Regional Development Strategy', which we believe remains a material consideration in the determination of planning applications. We would also like to attend an Independent Examination to present evidence and information associated with our representation.

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

I trust this information is of assistance.

Yours sincerely



Clark Baillie
Chief Executive

Housing Executive Response to Derry and Strabane Local Development Plan Draft Plan Strategy

Policy	Page	Representation / Support / Objection	Comments
Prematurity			<p>General Comments</p> <p>The Housing Executive would like further information on how prematurity could be applied. The application of prematurity is supported by the Strategic Planning Policy Statement (SPPS), and the Joint Ministerial Statement (JMS) "Development Plans and Implementation of the Regional Development Strategy". We believe the JMS remains a material consideration in the determination of planning applications.</p> <p>Previous Development Plans applied prematurity post publication of draft Plans. While we understand that there is no presumption that a Local Development Plan (LDP) is sound (Development Plan Practice Note 6), the option to apply prematurity is still included within the SPPS. The SPPS states that where any LDP is under preparation or review, it may be justifiable to refuse planning permission on grounds of prematurity, where development proposals would, individually or cumulatively, prejudice the outcome of the plan process. In addition, the SPPS does not include a statement that the weight attached depends on the stage of plan preparation.</p> <p>We believe that the dps should be a material consideration in the determination of planning applications in Derry and Strabane, as the extant plans, the Derry Area Plan 2011, and the Strabane Area Plan 1986-2001, are now out of date and were prepared before the publication of the current Regional Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p>

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PART A			
Contextual Chapters			
			<p>We welcome that in the preparation of the dps regard has been given to Lifetime Opportunities – Government’s Anti-Poverty and Social Inclusion Strategy for Northern Ireland aims to eliminate poverty and social exclusion and states that policies and programmes should be tailored to specific needs and targeted to those in greatest objective need. We believe that mixed tenure development and an adequate supply of affordable and accessible housing, and consequent balanced communities, can have a key role in the elimination of poverty and social exclusion.</p> <p>We believe that the housing policies within the LDP should aim to ensure that new residential developments provide adequate homes, for all in the Derry and Strabane City Council area. The UN defines an adequate home as having:</p> <ul style="list-style-type: none"> • security of tenure; • availability of services, materials, facilities and infrastructure; • affordability; • habitability; • accessibility; • location (close to employment opportunities and social facilities) and • cultural adequacy. <p>The ability for all to be housed in an adequate home is a necessary prerequisite to achieve the outcomes and strategic priorities of each theme within the Council’s Community Plan, “Strategic Growth Plan”.</p>
Table 2 Housing	20		The Housing Executive has now updated our Housing Need figures (table 3).

Policy	Page	Representation / Support / Objection	Comments										
Tenure			<p>These now identify need for:</p> <table border="1"> <thead> <tr> <th>Settlement Type</th> <th>Social Housing Need (Units) 5 years (2019-24)</th> </tr> </thead> <tbody> <tr> <td>City (Derry)</td> <td>2,355</td> </tr> <tr> <td>Main Town (Strabane)</td> <td>265</td> </tr> <tr> <td>Other Settlements</td> <td>177</td> </tr> <tr> <td>Derry City & Strabane District Total</td> <td>2,797</td> </tr> </tbody> </table>	Settlement Type	Social Housing Need (Units) 5 years (2019-24)	City (Derry)	2,355	Main Town (Strabane)	265	Other Settlements	177	Derry City & Strabane District Total	2,797
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City (Derry)	2,355												
Main Town (Strabane)	265												
Other Settlements	177												
Derry City & Strabane District Total	2,797												
Part B Overall Strategy													
Vision and Plan Objectives													
Vision	44	Support	<p>We support the LDP Vision, which aligns to the Community Plan visions and contains a reference to promoting well-being with equality of opportunity for all.</p>										
Plan Objectives	45-48	Support	<p>We support the Plan Objectives, which are set out under four sections. Of particular importance to the Housing Executive are:</p> <p>Spatial & Cross-Cutting Objectives</p> <ul style="list-style-type: none"> To protect and consolidate the role of local towns and villages spread across the District so that they act as local centres for appropriate-scale shops, employment, houses and community services, meeting the daily needs of their rural hinterlands. To provide for vital and vibrant rural communities elsewhere, including in 										

Policy	Page	Representation / Support / Objection	Comments
			<p>our small settlements, whilst protecting the countryside in which they live by accommodating appropriate development so as to sustain and service these rural communities.</p> <p>Economic Development Objectives</p> <ul style="list-style-type: none"> To facilitate the creation of approximately 15,000 new jobs by 2032, based upon projected population increase, reduced unemployment rates and investment-driven growth, focussed on the identified growth sectors, at a variety of locations where they are accessible to all members of the community, including those without a private car. <p>Social Development Objectives</p> <ul style="list-style-type: none"> To provide for approximately 9,000 new, quality homes by 2032, in a balance of private and social housing, in a variety of formats designed to meet the needs of families, including single-parent families, small households, the elderly and disabled and single people, at sustainable locations accessible to community services, leisure and recreational facilities, for those people with and without a car. Housing schemes in Derry city, Strabane and the smaller settlements will require imaginative and innovative design, including mixed use schemes, and possibly mixed tenure, to ensure that they link into the existing urban fabric. Rural houses also need to be of quality design and siting, with a focus on sustainable development to provide homes to sustain vibrant rural communities. To recognise the needs of both growing families and carers of the elderly and disabled by accommodating development, this allows people to remain within their own communities while not adversely impacting on neighbours or the environment.

Policy	Page	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> To achieve balanced communities and to accommodate cultural differences between communities of all religious backgrounds, whilst promoting “shared spaces” to bring people together with equality of opportunity. To close the gap in quality of life for those living in deprived areas. <p>Environment-Focused Objectives</p> <ul style="list-style-type: none"> To protect and enhance the natural and historic built environment to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and well-being. Protecting ecosystem services of fauna and flora, as well as achieving significantly more tree-cover, energy efficiency, less pollution and other measures to tackle climate change. To prevent future development of areas of flood risk, mitigating where necessary, and prevent inappropriate development that would cause or exacerbate flooding elsewhere.
Growth Strategy for Derry City and Strabane District			
Growth Strategy for Derry City and Strabane District	53	Representation	The Housing Executive notes text in paragraph 5.13 states that almost 4,000 social houses are required. The Housing Executive, has identified a need of approximately 4,400 units need to meet affordable housing need.
Strategy to Deliver the Growth Levels	54	Support	The Housing Executive supports this strategy to deliver growth and we especially welcome “provide adequate land for the delivery of approx. 9,000 new homes, including social / affordable housing, as well as the services and infrastructure to service the population, at appropriate locations across the District”.
Spatial Strategy for	56	Support	The Housing Executive supports the LDP’s spatial strategy, which focuses on

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the Derry City and Strabane District			Derry as the principal City and Strabane as a main hub, while sustaining rural communities. We believe this aligns with the RDS.
Overview of Settlement Hierarchy	57	Support	The Housing Executive agrees with the Settlement Hierarchy, as this will allow for balanced growth across the Council area.
Designation SETT 1 Settlement Hierarchy for DC&SD LDP 2032	58	Representation	The Housing Executive generally agrees with Designation SETT1 and the settlements identified under each tier. However, we believe that consideration could be given to include Corrickmore Avenue as a small settlement as this includes a cluster of houses and includes community infrastructure. We would welcome further discussion with the Council.
Designation SETT 2 Development within Settlement Development Limits	63	Support	The Housing Executive supports the identification of land use through zonings and local policy areas, and the presumption against development outside development limits. We believe this will ensure urban compact forms, the availability of land to meet a range of land use needs and can support a place making approach to development.
Designation SCA 1 Special Countryside Areas & Designation AHLI 1 Areas of High Landscape Value	64 & 65	Support	The Housing Executive supports these policies to protect areas of special landscape from inappropriate development.
Designation GB 1 Green Belts & Designation DPA 1 Development Pressure Areas	65 & 66	Support	The Housing Executive supports these policies, which will assist urban regeneration by promoting compact settlement forms and preventing urban sprawl and will limit unsustainable development within open countryside.

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Designation WECA 1 Wind Energy Capacity Areas	66	Support	The Housing Executive supports policies which will provide certainty for applicants wishing to erect a wind turbine or wind farm.
Spatial Plan for Derry and Spatial Plan for Strabane Town	68 -72	Support	The Housing Executive supports the spatial plans, including increasing housing density in accessible locations. We also welcome the potential to designate New Economic Development Areas to meet needs in areas of social disadvantage. In relation to Derry City Centre and Strabane Town Centre, we would like to see mixed use development that can permit residential uses above commercial ground floor spaces. This can increase the vibrancy and activity within city and town centres. We also support the focus on sustainable and active transport.
General Development Principles and Policies			
General Development Principles and Policies	73-110	Support	The Housing Executive welcomes specific policies on Climate Change, Health and Well Being, Shared Space and place making principles. In relation to housing, future-proofed homes looking to meet the changed climate, and demographic and social needs, in a holistic way will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate environmental impacts.
GDP 1 Sustainable Development	74	Support	The Housing Executive welcomes this Policy to ensure the Spatial Strategy is adhered to and that development is primarily directed at accessible locations.
GDP 2 Climate Change	76-77	Support	The Housing Executive supports this Policy to help ensure climate change resilience within the Council Area. Housing accounts for 13% of greenhouse gas emissions in Northern Ireland,

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			which is above the UK average. Improved energy efficiency including the integration of renewable energy, will enhance the sustainability of new and existing homes, helping improve the quality of life and health and wellbeing of all residents. We also note that throughout the British Isles development plans are increasingly requiring all new homes to be built to zero carbon standards or to passive design, and we would welcome the LDP encouraging these standards.
GDP 3 Improving Health and Well-Being	78	Support	The Housing Executive welcomes the recognition the role of planning policy can have to improve health and we strongly support that developers are expected to demonstrate how they have considered health and well-being in their developments.
GDP 4 Supporting Sustainable Economic Growth	82	Support	We support this Policy to provide economic growth without compromising environmental standards. We believe a strong economy is vital to support sustainable communities and well-being. We also note that quality development and environmental protection can promote attractive places where people wish to live, work and invest in.
GDP 5 Creating and Enhancing Shared Space	83	Support	We believe a Shared Space Policy can encourage community cohesion and the creation of sustainable communities, reducing the isolation of certain groups. We also believe that housing of different house types, sizes and tenures to meet different needs, promotes balanced and shared neighbourhoods.
GDP 6 Importance of Ecosystems Services	85	Support	The Housing Executive would like to see a precautionary principle employed when determining the impacts of development proposals on natural heritage resources. The consideration of biodiversity and natural heritage issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be "built in". The use of the Northern Ireland Biodiversity Checklist

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			<p>can help identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests.</p> <p>We support the recognition that trees and woodland contribute significantly, to people's well-being and the natural environment, providing habitats and sustaining biodiversity. In addition, the provision of trees and green open space include can aid flood protection and water management, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.</p> <p>The Housing Executive believes it is important to protect and create woodland and to increase the number of trees within cities and towns. We would like to see policies to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.</p>
GDP 7 Preserving and Enhancing the Natural Environment	86 & 87	Support	<p>The natural environment provides food, energy, flood control, clean water, clean air, aesthetics, as well as supporting wildlife and biodiversity. Therefore, the Housing Executive supports the Policy, to ensure natural environment considerations are effectively mainstreamed into policy and decision-making and to realise the potential of the natural environment in creating and maintaining high quality living places.</p>
GDP 8 Preserving and Enhancing the Built Environment	87 & 88	Support	<p>The Housing Executive welcomes this policy to protect and enhance the historic environment within the Council area. This will help promote and enhance a sense of place and belonging to an area.</p>
Implementation of General	88	Support	<p>The Housing Executive supports the implementation of General Development Principles.</p>

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Development Principles			
GPOL 1 General Development Management Policy	93	Support	The Housing Executive supports the essential criteria outlined in the Policy. We believe these will help provide sustainable development. We also believe that there is an opportunity for this development management policy to recognise that Section 76 Planning agreements can ensure the effective implementation of policy, including the Affordable Housing Policy.
GPOL 2 Design Policy in Settlements	104 & 105	Support	The Housing Executive supports a place-making approach, which links to urban design, ensuring that buildings are not be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area. Associated with place-making is place-management, which considers the long term maintenance and stewardship of an area, and we would like to see place-management as a factor to be taken into account in decision making. We believe planning agreements can be an important element of place-management by requiring the delivery of infrastructure to provide quality development, aiding a place-making approach.
Enforcement	109	Support	We support the text on Enforcement to ensure that LDP Policies are adhered to, thereby, providing systematic, considered and positive development that enhances the local environment and the quality of life for Council residents.
Part C Economy – Strategy, Designations & Policies			
Economic Development			
ED 1 General Criteria for Economic Development	117	Support	We support this policy to provide economic growth without compromising residential amenity, natural and built heritage assets or environmental quality. We believe a strong economy is vital to support sustainable communities and well-being. We also note that high quality development and environmental

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			<p>protection can promote attractive places where people wish to live, work and invest in.</p> <p>We welcome the recognition within the LDP that social economy makes an important contribution towards driving and delivering inclusive economic growth (paragraph 9.7). The Housing Executive's Social Housing Enterprise Investment Scheme has supported at least 20 social enterprises in the Council area in recent years; these are based in or serve Housing Executive communities. Like traditional businesses, social enterprises aim to make a profit, but profits are reinvested or donated to create positive social change. They are making big differences in our communities by creating new jobs and sustaining existing jobs in the heart of our estates. They are providing training opportunities to help people improve life skills, and provide important services in our communities such as cafés, handymen services, indoor play areas, health and fitness centres and tourism enterprises.</p>
		Representation	<p>While we support ED 1, we would like to see a policy that encourages the use of social clauses, for major development to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed to underemployed residents. The use of social clauses is often practiced in Great Britain to provide employment or training opportunities for young people or the long-term unemployed. We note that the Department of Finance, in conjunction with the Construction Industry Forum for Northern Ireland, has drawn up guidance and model contracts on sustainable construction. The aim of which is "to promote social inclusion and equal opportunities, including the progression of people who are long term unemployed and those leaving education and training, as a key way of delivering social elements of sustainable development".</p>

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ED 2 Office Development	119	Support	The Housing Executive supports this policy as it adopts a town centre-first approach to new office developments, which accords with the RDS and SPPs.
ED 3 Economic Development in Settlements	120	Support	We support the policy in relation to Economic Development in Settlements which aims to focus economic development uses to appropriate areas within settlements.
ED 4 Protection of Zoned and Established Economic Development Land and Uses	122	Support	The Housing Executive believes that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities. The Housing Executive supports the presumption against the alternative use of land zoned for economic development, which aligns with the RDS principle to maintain an adequate supply of employment land throughout the Plan period. We welcome the policy requirement that development proposals in the vicinity of an existing or proposed economic development use must be compatible with that use. This will ensure that local residents are not adversely affected by any industrial emissions, noise or heavy traffic.
ED 5 – ED 7 Economic Development in the	124	Support	We would also like to see the Policy state that if employment land is to be released for alternative uses; it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the District. We welcome the commitment in paragraph 9.46 to undertake an annual review of the uptake of the Council's economic development land.
			In respect of economic development in the countryside, we support the guiding principle to provide opportunities likely to benefit and sustain the rural community, while protecting or enhancing the character of the rural area.

Policy	Page	Representation / Support / Objection	Comments
Countryside RP 1 – RP 10 Retailing	131	City / Town Centres, Retailing, Offices, Leisure and Other Uses Support	<p>We strongly welcome these policies, which promote the regeneration of our city, and town centres as quality places to live, work, shop and visit. We support the town centre-first approach advocated in policy RP 1 to help ensure that town centres are vibrant, mixed-use areas, which reflects policy within the SPPS. We welcome the reference to residential properties in paragraph 10.12 as this use can help promote the vitality and viability of centres.</p> <p>We support policies RP 2, 3, 8 and 10; however, we would also like to see residential use promoted within existing town centres as well as commercial, business or community uses. We would like to see residential use specified as a main town centre use, as diversity of uses in town centres, including housing, will help enhance their vitality and viability. We believe that residential use on the upper floors of retail properties is appropriate within town centres, as Town Centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration. This will help promote accessible retail and services, an important element of sustainable communities.</p>
Strategic Objectives & Operational Policies TAM 1 – TAM 12	145	Support	<p>Transport and Movement</p> <p>The Housing Executive supports the Council's LDP Strategy in accordance with the Local Transport Study (LTS) as set out in paragraph 11.11. The LDP has a pivotal role to play to help ensure that the aspired transport and movement vision for the District is fully realised. We note that the seven objectives of the LTS have been developed to support the achievement of the objectives set out in the draft PFG.</p> <p>We strongly support the actions to promote sustainable transport and other</p>

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			<p>infrastructure within the Council area, such as active travel/walking and cycling provision, park and ride/park and share/park and stride facilities, and greenways and disused transport routes.</p> <p>We believe these will promote the integration of transport and patterns of development, which reduce the need to travel, promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times.</p> <p>The Housing Executive strongly supports policy TAM 1 as this will ensure that accessibility is integrated into the design of development proposals, which will help promote social inclusion and meet the needs of people of different ages and abilities.</p> <p>We would like some flexibility on parking standards for social housing schemes specifically due to lower car ownership levels for social housing, than other tenures of development, (55% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).</p>
AGR 1 – AGR 3	212	Support	
Agriculture & Other Development in the Countryside			
			<p>The Housing Executive supports the policy aims to facilitate agricultural and other suitable rural development in the countryside in sustainable locations. We believe that such development is important for sustaining rural communities, provided it is of an appropriate scale and does not compromise rural character and the environment.</p>
Part D Social Designations - – Strategy, Designations & Policies Housing in Settlements and in the Countryside			

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Summary of Land for Delivery of Housing (Table 9)	223	Representation	<p>While paragraph 16.13 states that there is ample housing land available within the District's settlements, we would like it noted that there are areas of high localised affordable housing need where it may be difficult to develop suitable sites. For example, there is a lack of opportunity for development across all tenures in the area south-west of the Derry City Centre. We would like the Council to consult with the Housing Executive in relation to locations where a housing need could be met beyond a local area, while Culmore is a separate settlement from Derry City we consider it part of the Westbank Housing Area and we would continue to welcome affordable housing proposals within the settlement.</p>
HOU 1 Strategic Allocation and Management of Housing Land – Zoned Housing Land and LUPAs	225&226	Support	<p>The Housing Executive generally supports the strategic allocation of housing land. In particular, we welcome the exceptions; to allow Phase 2 land to be released at an early opportunity and to identify additional land, including outside an SDL, where it provides affordable housing (social and intermediate) according to a need identified by the Housing Executive. These exceptions will help address the high affordable housing need in the DCSD area.</p> <p>The Housing Executive strongly supports mixed tenure development and we would like to see a reference to mixed tenure within this Policy, as a way to provide affordable housing within a balanced and sustainable community. However, while we believe the exceptions for affordable housing could be an important way to meet localised need, we would not like to see these used to provide large scale affordable housing developments, minimising the opportunity to create a balanced community. Rather, we would like to see a proportion of affordable housing to be required in all residential developments over a certain threshold, as outlined in HOU 5, in order to help address affordable housing need in a sustainable way, limiting the need for exceptions to</p>

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			<p>be applied.</p> <p>We understand that Phase 1 land will be mainly made up from existing commitments and that it will be difficult to retrospectively place a proportion of affordable housing on these sites. In these instances, we would welcome discussion with applicants on the potential for an element of affordable housing to be included as part of their scheme.</p>
HOU 2 Strategic Allocation of Housing In Settlements other than Zoned Housing Land and LUPAs	229	Support	<p>The Housing Executive supports this policy, which will help meet the RDS target for residential development on brownfield land. The Housing Executive supports development on brownfield land, where suitable for housing, as these locations within settlement limits are more likely to be accessible to public transport and services than greenfield sites. While we welcome the exception to OS 1, to release some open space to meet housing need, we believe this should be in instances of unforeseen housing need during the Plan period. We would like to see any existing open space, where there could be potential for small scale development, in order to provide a decisive community benefit, be subject to planned re-designation as part of the LPP stage.</p>
The LDP Strategy for Urban Housing	230	Support	<p>The Housing Executive strongly welcomes this Strategy, which supports a mix of housing in a range of sizes and tenures. This will help meet housing need for all households and will help promote cohesive and sustainable communities.</p>
HOU 3 Density of Residential Development	230	Support	<p>The Housing Executive supports the identified bands of density for residential development, promoting higher density in areas, which will have access to services and facilities. This will help reduce the need for greenfield sites and more compact urban forms that can help encourage sustainable travel. It should be noted that social housing development is generally at a higher density</p>

Policy	Page	Representation / Support / Objection	Comments
			than private housing, we would like this to be considered when assessing urban design and densities within planning applications.
HOU 4 Protection of Existing Residential Accommodation	232	Support	The Housing Executive supports this policy, which will protect existing housing stock; this will prevent rising housing need due to the loss of housing units.
HOU 5 Affordable Housing in Settlements	233	Objection	While we support many of the elements contained within this policy, we would like to see changes, in order that the range of housing need can be effectively addressed, therefore we are objecting to the HOU 5 in its current form.
			The Housing Executive has identified an affordable housing need of approximately 4,750 units over the plan period. While paragraph 16.46 states approximately 4,400 units can be provided for, as they are under construction, have planning permission, or can be accommodated on zoned land, we would like it noted that those sites under construction or with planning permission are already discounted from the housing need assessment.
			Due to the high housing need within Derry and Strabane, with the affordable housing need equating to just over 50% of the proposed 9,000 overall housing growth over the Plan period, we believe the 10% cannot meet an adequate proportion of affordable housing need, including the need of households in housing stress. A higher proportion of affordable housing would better meet housing need and provide more affordable housing within a mixed tenure context, limiting the need for affordable housing exceptions, contained within HOU 1, to be applied.
			While we support the provision that this proportion could be uplifted, we believe this would need to be set in Key Site Requirements for zoned housing

Policy	Page	Representation / Support / Objection	Comments
			<p>sites in the LPP and would not apply to windfall. As affordable housing need is high, we believe that uplifts may be required for many zoned sites, providing uncertainty for developers.</p> <p>We have concerns with the proportion that all housing schemes will be expected to have no more of a maximum of 70% of either private or affordable housing. We would like to see "private or affordable housing" changed to "social, intermediate and private" so that the policy is not in conflict with paragraph 16.56. The Housing Executive believes that sites identified for affordable housing can support mixed tenure if both social and intermediate housing are included within a scheme. Intermediate, shared ownership housing can be considered as part of the owner occupied market, and will fully enter the owner occupied market, once "stair-cased out". This seems to be supported by paragraph 16.56.</p> <p>Without the change from "private or affordable housing" changed to "social, intermediate and private" in the third paragraph of the Policy, we would have concerns with this Policy. We believe the 70% proportion does not align with the 10% requirement of affordable housing on private sites. The affordable housing requirement means 90% of a housing site could be market housing, meaning the 70% requirement would not be met. This will cause uncertainty for applicants of private housing, who would not know whether a 10% or 30% requirement of affordable housing would need to be met. We would also like clarification on whether the 70% figure would be applied to affordable housing exceptions, outlined in HOU 1.</p> <p>The Housing Executive strongly supports mixed tenure and we would like to see an appropriate balance of tenures across Derry and Strabane, but we believe that tenure mix may best be considered on a site-by-site basis. It can be difficult</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>to put an exact figure on this, especially on sites with a low threshold, as the tenure mix of the surrounding area also needs to be taken into account in a holistic way, to consider how a balanced community can best be supported.</p> <p>Without an increase of the proportion of the 10% affordable housing requirement, we do not believe affordable housing need can be adequately met by the LDP, triggering the following soundness tests:</p> <p>C1: Did the Council take account of the Regional Development Strategy? The RDS under RG8 states that the varied housing needs of the whole community need to be met. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone and that development plans should take account of the HNA to “manage housing growth to achieve sustainable patterns of residential development”.</p> <p>C2: Did the Council take account of its Community Plan? Derry and Strabane’s community plan, the Strategic Growth Plan, contains the key action to “Provide quality social and private housing in sustainable urban and rural neighbourhoods to meet the needs of our growing population”.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department? The SPPS states that the Housing Executive’s HNA provides an evidence base that must inform the housing allocation in LDPs, in order to influence a reasonable mix and balance of housing tenures and types.</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>C4: Has the Plan had regard to other relevant plans, policies and strategies, relating to the Council's district or to any adjoining Council's district? The PFG Outcome 8 "We care for others and we help those in need" and Outcome 13 "We connect people and opportunities through our infrastructure" contain indicators 8 and 48 to "turn the curve" in relation to the number of households in housing stress and to address the gap between the houses we need and the houses we have.</p> <p>CE2: The strategy, policies and allocations, are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base. As the proposed Affordable Housing Policy is not expected to have sufficient ability to meet the need identified in the HNA we do not believe the Policy takes sufficient account of the HNA and, therefore, is not founded on a robust evidence base.</p> <p>We would also like statements within the Policy box and paragraph 16.50, to state if need has been met or decreased, this will need to be confirmed by the Housing Executive. In addition, we would like to see an amendment to the second sentence of the Policy box to state that the housing mix can be determined "with regard given to consultation with the NIHE and with its up-to-date analysis of demand, including housing stress and prevailing housing need".</p>
HOU 6 House Types, Size and Tenure	237	Support	The Housing Executive supports the Policy, which can assist the Council meet the SPPS and RDS requirements to meet the housing needs for all. A range of houses can provide appropriate housing for different household groups, such as families and older people thereby promoting social inclusion.

Policy	Page	Representation / Support / Objection	Comments
HOU 7 Accessible Housing	239	Support	<p>The Housing Executive strongly supports this Policy.</p> <p>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>Standards for Lifetime Homes and wheelchair housing are already in place in Northern Ireland for social housing developments. However, this Policy can help address a lack of accessible housing, for households who wish to live independently in private sector accommodation.</p> <p>Lifetime Homes</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. 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>

Policy	Page	Representation / Support / Objection	Comments
HOU 8 Quality in New Residential Developments	241	Support	<p>Wheelchair Housing</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>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>
			<p>The quality of our homes and neighbourhoods has a significant influence on our health, happiness, confidence, social life, relationships with our families and general well-being. Therefore, the Housing Executive supports this policy to ensure that new residential development is of high quality design within attractive and sustainable neighbourhoods.</p> <p>We welcome the proposal that all new dwellings areas should be built to a space standard, to be included in an SPG. The Royal Institute of British Architects states space in housing has a significant ongoing effect on quality of life and "A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, and exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion".</p> <p>We support the requirement for adequate open space provision in new</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>residential developments, which is particularly important for new family dwellings. We would welcome a statement stating that open space should be in a variety of formats dependent on the type of residential units proposed.</p> <p>The Housing Executive believes there is an opportunity for the Policy to promote energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. We note that in England, fossil fuel boilers in new homes are being phased out by 2025, so we would like to see renewable heating sources and carbon neutral homes encouraged within the DPS.</p>
HOU 9 Design Concept Statements, Concept Master Plans and Comprehensive Planning	243	Support	<p>The Housing Executive supports the requirement for Design Concept Statements and Concept Masterplans to be submitted as part of a planning application for residential development. We believe this will help achieve a place making approach and ensure that proposal has been formulated in line with LDP Policy. We also believe the use of Planning Agreements can support the effective implementation with policy, can ensure the delivery of necessary infrastructure, thereby providing place management.</p>
HOU 10 Residential Extensions and Alterations	245	Support	<p>The Housing Executive supports the proposed policy on extensions and alterations, which can enhance the flexibility, resilience, and endurance of a dwelling, allowing it to adapt to different users and their needs.</p>
HOU 11 Development of Existing Buildings or Infilling of Sites for Housing	248	Support	<p>The Housing Executive supports the protection of quality environments and distinctive patterns of development and character, which help provide a sense of place of an area.</p>

Policy	Page	Representation / Support / Objection	Comments
HOU 12 Flats and Apartments	249 & 250	Support	The Housing Executive believes HOU 12 will promote choice, to meet a range of need and demand, supporting enduring buildings and sustainable development. This policy provides flexibility allowing the conversion of buildings to meet demand for additional housing solutions or for commercial space. This will help prevent areas of vacancy, underuse and dereliction and with the criteria for redevelopment in a comprehensive way, will protect and enhance environmental amenity.
HOU 13 & HOU 14 Houses in Multiple Occupation	251 & 252	Support	The Housing Executive supports this Policy HOU 13, which can provide additional affordable housing, especially for single households. We also believe the limitation of HMOs will be appropriate to ensure a balance of households within established residential areas. We believe the criteria of HOU 14 will help ensure that residents of HMOs live in suitable accommodation.
HOU 15 Specialist Residential Accommodation	253	Support	The Housing Executive supports this policy on Specialist Accommodation, which can assist our Supporting People Programme. Supported housing is for individuals who cannot live independently in their own home. They require extra housing support and/or an element of care, in addition to a home. Accommodation can take the form of self-contained or shared accommodation. The term "shared housing" is used to describe accommodation for two or more persons with shared facilities, e.g. bathroom, kitchen, communal living room or dining room. Shared housing can include clusters of dwellings, group homes or hostels. Supported housing need is identified, for a three-year programme, through a commissioning process with partners including the Housing Executive, the Health and Social Care Board, Health Trusts and the Probation Board.

Policy	Page	Representation / Support / Objection	Comments
			As Supported housing need is not projected on a long-term basis, we support that this development management policy in respect of specialist housing is included within the LDP. We would like to see the Policy recognise that some flexibility may be required in the application of residential design standards due to the specific nature of specialist accommodation.
HOU 16 Travellers Accommodation	254	Support	We welcome this policy to ensure that Travellers' needs are adequately catered for within the LDP. There is an opportunity for the Policy to refer to the Design Guide for Traveller Sites in Northern Ireland, the new Model Licence Conditions 2019 for Caravan Sites (published by Department for Infrastructure) and Draft Design Guide for Travellers' Sites 2019 (published by Department for Communities). Adherence to relevant guidance will assist in the delivery of high quality designed sites, improving living standards for Travellers, thereby improving health and wellbeing. The Housing Executive has responsibility to identify the housing needs of Irish Travellers.
HOU 17 Large-Scale Managed Student Accommodation	255	Support	The Housing Executive supports the criteria for student accommodation within this Policy.
The LDP Strategy for Housing in the Countryside and Policies HOU 18-26	256 -275	Support	The Housing Executive supports the Strategy and Policy to facilitate development that contributes to a sustainable rural community, while protecting and conserving the rural landscape, heritage assets and the environment.
HOU 25 Affordable Housing in the Countryside	274	Support	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

Policy	Page	Representation / Support / Objection	Comments
			<p>of policy HOU 25 will provide flexibility should need rise over the Plan period. We support the restriction that planning permission will only be given where applications are submitted by a Housing Association but we would also welcome the inclusion of the Housing Executive within this statement. We also welcome the inclusion that the Housing Executive will identify affordable housing need.</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the implementation of CTY5 of PPS 21. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when applying for planning permission under this Policy.</p> <p>We also note the restriction of this Policy on proposed areas of Green Belt. The Housing Executive would therefore like adequate land to be identified within SDLs, including the potential extension of a SDL, to meet affordable housing need. We would also to see this closely monitored, in case there is increased need arising over the Plan period.</p>
The Council's LDP Open Space Strategy		Support	<p>Open Space, Sport and Outdoor Recreation</p> <p>The Housing Executive supports the intention to provide a strategic policy framework for the provision and protection of green and blue infrastructure within the Borough. We note Belfast City Council have produced a draft Green and Blue Infrastructure Strategy, an Open Space Strategy, and propose a range of new strategies and plans for Belfast open space. Therefore, we believe there may be an opportunity for the Council to develop further comprehensive open space strategies.</p> <p>The Housing Executive believes that master planning would provide a strategic approach in the creation of new open space that forms part of a network. We</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>believe that in strategic development sites, and in areas which are in an “accessibility hot spot”, potential open space areas could be allocated and protected within the Local Policies Plan of the LDP. The delivery of these sites could be funded by developer contributions. This would ensure a cohesive approach in the delivery of new and linked spaces, which are not subject to a reactive and possibly piecemeal approach.</p>
OS 1 Protection of Open Space	280	Support	<p>The Housing Executive strongly supports this policy to protect areas of existing open space. Open space is important in the creation of sustainable communities, as it is greatly beneficial to peoples’ health and wellbeing, helps to create a quality living environment, provides opportunities for play, helps alleviate flood risk and encourages community cohesion. It can also support wildlife and biodiversity, improve connectivity and attract investment in the economy.</p> <p>The Housing Executive supports the policy presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that outweigh the loss of the open space. We strongly welcome the inclusion of the provision of affordable housing included as an example of a substantial community benefit. We would like to see that where any affordable housing is proposed as an exception, that applications are restricted to a Housing Association and the Housing Executive.</p> <p>We believe, however, that there is a higher test for Exception 1, of the two exception tests, despite that Exception 1 is required to provide a “substantial community benefit”. There is no requirement for proposed Exception 2 cases, which do not provide a “substantial community benefit”, to provide a comprehensive development plan or to provide additional facilities for</p>

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			<p>"community betterment". This means that applicants who wish to provide a substantial community benefit have to comply with more onerous conditions than a private developer. As, under Exception 1 there may be a requirement, similar to Exception 2, to provide alternative open space, in this instance, there would be no reason to use Exception 1 as a route to development, even if it was to provide a community benefit such as to provide a home to households in housing need. Rather, an applicant could use the Exception 2 route and need not fulfil the criteria to provide additional facilities for "community betterment".</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the operation of the open space exception policy in PPS 8. We believe the criteria in this Protocol were proportionate and would like to see consideration of these criteria to be included within the Policy. We would also 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>
OS 2 Public Open Space in New Developments	284-286	Support	<p>The Housing Executive welcomes these policies in relation to the provision of public open space. We support the requirement for the provision of adequate, integral public open space in new residential developments of 25 units/1 hectare or more. We believe the provision of open space and its long-term maintenance and management is important in the creation of sustainable communities, as it is greatly beneficial to peoples' health and wellbeing and encourages community cohesion. We welcome the statement that a sufficient equipped children's play area exists within a reasonable walking distance. In addition, we would like to see a requirement that such play areas are easily accessible, to meet the needs of disabled people and those children can access them safely, for example, using pedestrian crossings. These spaces, and safe routes to them, should be explicitly planned into residential areas and town</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>centres.</p> <p>The Housing Executive recognises that play is critical to the lives of children and young people, contributing to their social, physical and emotional health and well-being as well as supporting learning and skills development. The Right to Play is enshrined in the UN Convention on the Rights of the Child (UNCRC 1989), Article 31 which states that all children and young people have the right to play and engage in recreational activities appropriate to their age. As signatories to the UNCRC, all branches of UK government have a responsibility to work towards delivery of the Right to Play.</p> <p>This commitment to delivering the Right to Play is emphasised regionally through The Children’s Services Co-operation Act (2015) and the emerging Children and Young People’s Strategy (2017 to 2027). Additionally one of the draft Programme for Government key high level outcomes is “We give our children and young people the best start in life”; many of the other PfG outcomes are related by the right to play in cross cutting benefits to health, education and the environment.</p> <p>New development should usually conserve wildlife habitats, existing trees and quality vegetation. It should promote further biodiversity by providing open space with uncultivated areas and green corridors. Natural rewilding is an effective way of producing rich habitats and can recover biodiversity loss.</p>
OS 3 Green and Blue Infrastructure	289	Support	<p>The Housing Executive agrees with the policy approach to protect and enhance greenways across the Council area, which will form part of a multi-functional green and blue infrastructure network. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion,</p>

Policy	Page	Representation / Support / Objection	Comments
Open Space Policies OS 4 - 8	290 - 296	Support	pollution and greenhouse gas emissions. Disused Transport Routes or Community Greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles, also opening up the countryside, providing wildlife corridors, attracting visitors and providing economic benefits. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated, to create a network of traffic-free routes. In order to promote further the use of greenways, we believe that bike stations along greenways could further connect people, and encourage people to cycle, over a longer distance than walking.
CI 1 Community Infrastructure	299	Support	The Housing Executive welcomes this Policy to support the allocation and protection of land for education, health, community and cultural facilities as these are necessary components of sustainable communities. In addition, we believe the uplift in land values generated by the granting of planning permission should help fund additional community infrastructure that can contribute to people's well-being.
Community Infrastructure			
Part E Environment – Strategy, Designations & Policies			
Natural, Coastal and Historic Environment			

Policy	Page	Representation / Support / Objection	Comments
Natural, Coastal and Historic Environment Strategies and Policies NE 1 – HE 9	325 - 362	Support	<p>The Housing Executive supports policies that protect our coast, natural and built heritage assets and resources. These will help contribute to the quality of life of residents, promote and maintain local identity, act as a stimulus for regeneration and provide opportunities for recreation, education and tourism.</p> <p>The Housing Executive supports a precautionary principle when determining the impacts of development on environmental and heritage resources, and support the use of The NI Biodiversity Checklist as recommended in the Natural Heritage policies, to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests.</p> <p>The consideration of biodiversity issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be 'built in' to a project by developers and will also assist planning authorities in considering the potential impacts of development proposals on biodiversity interests. We believe that additional biodiversity can be proactively enhanced through the development management process, for example, by providing habitats for animals and birds, such as the incorporation of swift nest bricks in new developments.</p> <p>We welcome policy HE 8 Conversion and Reuse of Non-Listed Vernacular Buildings as we believe that underused and vacant unlisted locally important buildings or vernacular buildings have the potential to become catalysts for regeneration, through sympathetic adaptive reuse. This sustainable approach preserves important elements of identity and local distinctiveness.</p> <p>The Housing Executive also welcomes Policies that help protect the coast from unacceptable development but would allow development that provides public</p>

Policy	Page	Representation / Support / Objection	Comments
			access and environmental benefit. These Policies can assist the regeneration of coastal areas and will encourage recreation leading to active lifestyles, promoting health and well-being of communities.
Renewable and Low Carbon Energy Development			
The LDP Strategy and Policy RED 1 for Renewable and Low Carbon Energy Development	367 - 372	Support	The Housing Executive, as the Home Energy Conservation Authority for Northern Ireland, supports maximising the opportunities to develop renewable energy generation facilities in appropriate locations, as these can bring many social, economic and environmental benefits. Renewable energy schemes can reduce fuel poverty for local people and help improve air quality, thereby increasing and protecting health and wellbeing.
Development and Flooding			
The LDP Strategy and Policies for Development and Flooding	378 - 393	Support	Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. We welcome policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We support actions which can increase resilience to climate change and which are important ways to assist flood prevention. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome the need for drainage assessments to be provided for all new residential developments in areas where there is evidence of/potential for surface water flooding and in other circumstances as specified in policy FLD 3. We support the promotion of the use of Sustainable Urban Drainage Systems, which can be used effectively to manage surface water run-off by, for example, the use of green roofs/walls, tree pits and swales, which help integrate green and blue infrastructure into the public realm/buildings and enhance nature conservation and biodiversity.

Policy	Page	Representation / Support / Objection	Comments
Part F Place – Making and Design Vision			
Place-Making & Design Vision For Development in the District			
Place-making & Design Vision for Development in the District	399	Support	<p>The Housing Executive supports a place-making approach, which links to urban design, ensuring that buildings are not to be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area.</p> <p>We welcome the design and place-making vision for the District, which includes 6 overarching Place-making & design objectives (PDOs), 18 Place-making & design Principles (PDPs) and Strategic Design Policies (SDPs) for Derry, Strabane, Local Towns, Villages, Small Settlements and the Countryside. We support this design and place-making vision for the District, as the locally specific policies (SDPs) in conjunction with the PDOs and PDPs, will complement other relevant policies within the LDP, and help deliver sustainable, locally distinctive, high quality design proposals across the District.</p>
Part G Place – Specialised Requirements			
Developer Contributions and Community Benefits			
Developer Contributions	455 & 456	Support	<p>We strongly support the introduction of Developer Contributions, within the dPS, which means that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The Housing Executive would also like to see a developer contribution to help provide affordable housing. Developer contributions for affordable housing would enable government to deliver housing to match unmet housing need, help to achieve balanced communities through mixed tenure housing, and</p>

Policy	Page	Representation / Support / Objection	Comments
			<p>would reduce the need for housing association grant. This reduction in grant would support a larger programme of new build development, thereby further helping to address housing need within the Council area. The Housing Executive would welcome an opportunity to meet with the Council to discuss further progressing a developer contribution policy for affordable housing and how this could be implemented.</p> <p>In addition, we support the statements that a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.</p>
Regeneration / Comprehensive Re-Development			
Regeneration / Comprehensive Re-Development	459 & 460	Support	<p>The Housing Executive welcomes working with the Council to support regeneration in Derry and Strabane through the Local Development and Community Plans. The Housing Executive has a long history of successful regeneration and as a landlord and landowner, provides physical regeneration through stock management and improvements, environmental improvements to estates, including enhancing open space areas through planting and by providing space for facilities such as community allotments.</p> <p>We also provide regeneration and support to local communities through Community Asset Transfer and strategies on Community Safety, Good Relations, Community Involvement and our Social Enterprise Strategy with approximately 20 social enterprises supported by the Housing Executive in Derry and Strabane in 2018. We also provide community grants and administer programmes such as "Housing and Heritage" and DFC's "Small Pockets of Deprivation Programme".</p> <p>In addition, we believe mixed tenure development can encourage regeneration</p>

Policy	Page	Representation / Support / Objection	Comments
			by allowing people of different backgrounds to live together, thereby strengthening community cohesion.
Part H Place – LDP Monitoring and Review			
Monitoring Criteria and Review Process			
Monitoring Criteria and Review Process	471	Support	The Housing Executive would welcome assisting the Council through a housing working group and meetings on the implementation and monitoring of the draft Plan Strategy Policies, especially HOU 5 "Affordable Housing". We also welcome the statement in paragraph 40.6 that affordable housing need will be monitored throughout the Plan period. As the Housing Executive monitors affordable housing need on an annual basis, we would like to assist the Council in this process.
Appendices			
Appendix 7 Glossary of Terms & Abbreviations			
Appendix 7 Glossary of Terms & Abbreviations	517-523	Representation	<p>The Housing Executive believes that the Policy proposals would be benefit from further clarification by including definitions for the terms:</p> <ul style="list-style-type: none"> • Affordable Housing; • Social Housing; • Intermediate Housing; • Committed housing sites; and • Whiteland.

Housing Executive Response to Derry and Strabane Local Development Plan Draft Plan Strategy

Policy	Page	Representation / Support / Objection	Comments
Prematurity			<p>General Comments</p> <p>The Housing Executive would like further information on how prematurity could be applied. The application of prematurity is supported by the Strategic Planning Policy Statement (SPPS), and the Joint Ministerial Statement (JMS) "Development Plans and Implementation of the Regional Development Strategy". We believe the JMS remains a material consideration in the determination of planning applications.</p> <p>Previous Development Plans applied prematurity post publication of draft Plans. While we understand that there is no presumption that a Local Development Plan (LDP) is sound (Development Plan Practice Note 6), the option to apply prematurity is still included within the SPPS. The SPPS states that where any LDP is under preparation or review, it may be justifiable to refuse planning permission on grounds of prematurity, where development proposals would, individually or cumulatively, prejudice the outcome of the plan process. In addition, the SPPS does not include a statement that the weight attached depends on the stage of plan preparation.</p> <p>We believe that the dPS should be a material consideration in the determination of planning applications in Derry and Strabane, as the extant plans, the Derry Area Plan 2011, and the Strabane Area Plan 1986-2001, are now out of date and were prepared before the publication of the current Regional Development Strategy 2035 (RDS) and the enactment of the Planning Act (Northern Ireland) 2011.</p>

Policy	Page	Representation / Support / Objection	Comments
PART A			
Contextual Chapters			
			<p>We welcome that in the preparation of the DPS regard has been given to Lifetime Opportunities – Government’s Anti-Poverty and Social Inclusion Strategy for Northern Ireland aims to eliminate poverty and social exclusion and states that policies and programmes should be tailored to specific needs and targeted to those in greatest objective need. We believe that mixed tenure development and an adequate supply of affordable and accessible housing, and consequent balanced communities, can have a key role in the elimination of poverty and social exclusion.</p> <p>We believe that the housing policies within the LDP should aim to ensure that new residential developments provide adequate homes, for all in the Derry and Strabane City Council area. The UN defines an adequate home as having:</p> <ul style="list-style-type: none"> • security of tenure; • availability of services, materials, facilities and infrastructure; • affordability; • habitability; • accessibility; • location (close to employment opportunities and social facilities) and • cultural adequacy. <p>The ability for all to be housed in an adequate home is a necessary prerequisite to achieve the outcomes and strategic priorities of each theme within the Council’s Community Plan, “Strategic Growth Plan”.</p>
Table 2 Housing	20		The Housing Executive has now updated our Housing Need figures (table 3).

Policy	Page	Representation / Support / Objection	Comments										
Tenure			<p>These now identify need for:</p> <table border="1"> <thead> <tr> <th>Settlement Type</th> <th>Social Housing Need (Units) 5 years (2019-24)</th> </tr> </thead> <tbody> <tr> <td>City (Derry)</td> <td>2,355</td> </tr> <tr> <td>Main Town (Strabane)</td> <td>265</td> </tr> <tr> <td>Other Settlements</td> <td>177</td> </tr> <tr> <td>Derry City & Strabane District Total</td> <td>2,797</td> </tr> </tbody> </table>	Settlement Type	Social Housing Need (Units) 5 years (2019-24)	City (Derry)	2,355	Main Town (Strabane)	265	Other Settlements	177	Derry City & Strabane District Total	2,797
Settlement Type	Social Housing Need (Units) 5 years (2019-24)												
City (Derry)	2,355												
Main Town (Strabane)	265												
Other Settlements	177												
Derry City & Strabane District Total	2,797												
Part B Overall Strategy													
Vision and Plan Objectives													
Vision	44	Support	We support the LDP Vision, which aligns to the Community Plan visions and contains a reference to promoting well-being with equality of opportunity for all.										
Plan Objectives	45-48	Support	<p>We support the Plan Objectives, which are set out under four sections. Of particular importance to the Housing Executive are:</p> <p>Spatial & Cross-Cutting Objectives</p> <ul style="list-style-type: none"> To protect and consolidate the role of local towns and villages spread across the District so that they act as local centres for appropriate-scale shops, employment, houses and community services, meeting the daily needs of their rural hinterlands. To provide for vital and vibrant rural communities elsewhere, including in 										

Policy	Page	Representation / Support / Objection	Comments
			<p>our small settlements, whilst protecting the countryside in which they live by accommodating appropriate development so as to sustain and service these rural communities.</p> <p>Economic Development Objectives</p> <ul style="list-style-type: none"> • To facilitate the creation of approximately 15,000 new jobs by 2032, based upon projected population increase, reduced unemployment rates and investment-driven growth, focussed on the identified growth sectors, at a variety of locations where they are accessible to all members of the community, including those without a private car. <p>Social Development Objectives</p> <ul style="list-style-type: none"> • To provide for approximately 9,000 new, quality homes by 2032, in a balance of private and social housing, in a variety of formats designed to meet the needs of families, including single-parent families, small households, the elderly and disabled and single people, at sustainable locations accessible to community services, leisure and recreational facilities, for those people with and without a car. Housing schemes in Derry city, Strabane and the smaller settlements will require imaginative and innovative design, including mixed use schemes, and possibly mixed tenure, to ensure that they link into the existing urban fabric. Rural houses also need to be of quality design and siting, with a focus on sustainable development to provide homes to sustain vibrant rural communities. • To recognise the needs of both growing families and carers of the elderly and disabled by accommodating development, this allows people to remain within their own communities while not adversely impacting on neighbours or the environment.

Policy	Page	Representation / Support / Objection	Comments
			<ul style="list-style-type: none"> To achieve balanced communities and to accommodate cultural differences between communities of all religious backgrounds, whilst promoting “shared spaces” to bring people together with equality of opportunity. To close the gap in quality of life for those living in deprived areas. <p>Environment-Focused Objectives</p> <ul style="list-style-type: none"> To protect and enhance the natural and historic built environment to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and well-being. Protecting ecosystem services of fauna and flora, as well as achieving significantly more tree-cover, energy efficiency, less pollution and other measures to tackle climate change. To prevent future development of areas of flood risk, mitigating where necessary, and prevent inappropriate development that would cause or exacerbate flooding elsewhere.
Growth Strategy for Derry City and Strabane District			
Growth Strategy for Derry City and Strabane District	53	Representation	The Housing Executive notes text in paragraph 5.13 states that almost 4,000 social houses are required. The Housing Executive, has identified a need of approximately 4,400 units need to meet affordable housing need.
Strategy to Deliver the Growth Levels	54	Support	The Housing Executive supports this strategy to deliver growth and we especially welcome “provide adequate land for the delivery of approx. 9,000 new homes, including social / affordable housing, as well as the services and infrastructure to service the population, at appropriate locations across the District”.
Spatial Strategy for	56	Support	The Housing Executive supports the LDP’s spatial strategy, which focuses on

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the Derry City and Strabane District			Derry as the principal City and Strabane as a main hub, while sustaining rural communities. We believe this aligns with the RDS.
Overview of Settlement Hierarchy	57	Support	The Housing Executive agrees with the Settlement Hierarchy, as this will allow for balanced growth across the Council area.
Designation SETT 1 Settlement Hierarchy for DC&SD LDP 2032	58	Representation	The Housing Executive generally agrees with Designation SETT1 and the settlements identified under each tier. However, we believe that consideration could be given to include Corrickmore Avenue as a small settlement as this includes a cluster of houses and includes community infrastructure. We would welcome further discussion with the Council.
Designation SETT 2 Development within Settlement Development Limits	63	Support	The Housing Executive supports the identification of land use through zonings and local policy areas, and the presumption against development outside development limits. We believe this will ensure urban compact forms, the availability of land to meet a range of land use needs and can support a place making approach to development.
Designation SCA 1 Special Countryside Areas & Designation AHLI 1 Areas of High Landscape Value	64 & 65	Support	The Housing Executive supports these policies to protect areas of special landscape from inappropriate development.
Designation GB 1 Green Belts & Designation DPA 1 Development Pressure Areas	65 & 66	Support	The Housing Executive supports these policies, which will assist urban regeneration by promoting compact settlement forms and preventing urban sprawl and will limit unsustainable development within open countryside.

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Designation WECA 1 Wind Energy Capacity Areas	66	Support	The Housing Executive supports policies which will provide certainty for applicants wishing to erect a wind turbine or wind farm.
Spatial Plan for Derry and Spatial Plan for Strabane Town	68 -72	Support	The Housing Executive supports the spatial plans, including increasing housing density in accessible locations. We also welcome the potential to designate New Economic Development Areas to meet needs in areas of social disadvantage. In relation to Derry City Centre and Strabane Town Centre, we would like to see mixed use development that can permit residential uses above commercial ground floor spaces. This can increase the vibrancy and activity within city and town centres. We also support the focus on sustainable and active transport.
General Development Principles and Policies			
General Development Principles and Policies	73-110	Support	The Housing Executive welcomes specific policies on Climate Change, Health and Well Being, Shared Space and place making principles. In relation to housing, future-proofed homes looking to meet the changed climate, and demographic and social needs, in a holistic way will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate environmental impacts.
GDP 1 Sustainable Development	74	Support	The Housing Executive welcomes this Policy to ensure the Spatial Strategy is adhered to and that development is primarily directed at accessible locations.
GDP 2 Climate Change	76-77	Support	The Housing Executive supports this Policy to help ensure climate change resilience within the Council Area. Housing accounts for 13% of greenhouse gas emissions in Northern Ireland,

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			<p>which is above the UK average. Improved energy efficiency including the integration of renewable energy, will enhance the sustainability of new and existing homes, helping improve the quality of life and health and wellbeing of all residents. We also note that throughout the British Isles development plans are increasingly requiring all new homes to be built to zero carbon standards or to passive design, and we would welcome the LDP encouraging these standards.</p>
GDP 3 Improving Health and Well-Being	78	Support	<p>The Housing Executive welcomes the recognition the role of planning policy can have to improve health and we strongly support that developers are expected to demonstrate how they have considered health and well-being in their developments.</p>
GDP 4 Supporting Sustainable Economic Growth	82	Support	<p>We support this Policy to provide economic growth without compromising environmental standards. We believe a strong economy is vital to support sustainable communities and well-being. We also note that quality development and environmental protection can promote attractive places where people wish to live, work and invest in.</p>
GDP 5 Creating and Enhancing Shared Space	83	Support	<p>We believe a Shared Space Policy can encourage community cohesion and the creation of sustainable communities, reducing the isolation of certain groups. We also believe that housing of different house types, sizes and tenures to meet different needs, promotes balanced and shared neighbourhoods.</p>
GDP 6 Importance of Ecosystems Services	85	Support	<p>The Housing Executive would like to see a precautionary principle employed when determining the impacts of development proposals on natural heritage resources. The consideration of biodiversity and natural heritage issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be "built in". The use of the Northern Ireland Biodiversity Checklist</p>

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			<p>can help identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests.</p> <p>We support the recognition that trees and woodland contribute significantly, to people's well-being and the natural environment, providing habitats and sustaining biodiversity. In addition, the provision of trees and green open space include can aid flood protection and water management, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.</p> <p>The Housing Executive believes it is important to protect and create woodland and to increase the number of trees within cities and towns. We would like to see policies to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.</p>
GDP 7 Preserving and Enhancing the Natural Environment	86 & 87	Support	<p>The natural environment provides food, energy, flood control, clean water, clean air, aesthetics, as well as supporting wildlife and biodiversity. Therefore, the Housing Executive supports the Policy, to ensure natural environment considerations are effectively mainstreamed into policy and decision-making and to realise the potential of the natural environment in creating and maintaining high quality living places.</p>
GDP 8 Preserving and Enhancing the Built Environment	87 & 88	Support	<p>The Housing Executive welcomes this policy to protect and enhance the historic environment within the Council area. This will help promote and enhance a sense of place and belonging to an area.</p>
Implementation of General	88	Support	<p>The Housing Executive supports the implementation of General Development Principles.</p>

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Development Principles			
GDPOL 1 General Development Management Policy	93	Support	The Housing Executive supports the essential criteria outlined in the Policy. We believe these will help provide sustainable development. We also believe that there is an opportunity for this development management policy to recognise that Section 76 Planning agreements can ensure the effective implementation of policy, including the Affordable Housing Policy.
GDPOL 2 Design Policy in Settlements	104 & 105	Support	The Housing Executive supports a place-making approach, which links to urban design, ensuring that buildings are not be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area. Associated with place-making is place-management, which considers the long term maintenance and stewardship of an area, and we would like to see place-management as a factor to be taken into account in decision making. We believe planning agreements can be an important element of place-management by requiring the delivery of infrastructure to provide quality development, aiding a place-making approach.
Enforcement	109	Support	We support the text on Enforcement to ensure that LDP Policies are adhered to, thereby, providing systematic, considered and positive development that enhances the local environment and the quality of life for Council residents.
Part C Economy – Strategy, Designations & Policies			
Economic Development			
ED 1 General Criteria for Economic Development	117	Support	We support this policy to provide economic growth without compromising residential amenity, natural and built heritage assets or environmental quality. We believe a strong economy is vital to support sustainable communities and well-being. We also note that high quality development and environmental

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		Representation	<p>protection can promote attractive places where people wish to live, work and invest in.</p> <p>We welcome the recognition within the LDP that social economy makes an important contribution towards driving and delivering inclusive economic growth (paragraph 9.7). The Housing Executive's Social Housing Enterprise Investment Scheme has supported at least 20 social enterprises in the Council area in recent years; these are based in or serve Housing Executive communities. Like traditional businesses, social enterprises aim to make a profit, but profits are reinvested or donated to create positive social change. They are making big differences in our communities by creating new jobs and sustaining existing jobs in the heart of our estates. They are providing training opportunities to help people improve life skills, and provide important services in our communities such as cafés, handymen services, indoor play areas, health and fitness centres and tourism enterprises.</p> <p>While we support ED 1, we would like to see a policy that encourages the use of social clauses, for major development to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed to underemployed residents. The use of social clauses is often practiced in Great Britain to provide employment or training opportunities for young people or the long-term unemployed. We note that the Department of Finance, in conjunction with the Construction Industry Forum for Northern Ireland, has drawn up guidance and model contracts on sustainable construction. The aim of which is "to promote social inclusion and equal opportunities, including the progression of people who are long term unemployed and those leaving education and training, as a key way of delivering social elements of sustainable development".</p>

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ED 2 Office Development	119	Support	The Housing Executive supports this policy as it adopts a town centre-first approach to new office developments, which accords with the RDS and SPFS.
ED 3 Economic Development in Settlements	120	Support	We support the policy in relation to Economic Development in Settlements which aims to focus economic development uses to appropriate areas within settlements.
ED 4 Protection of Zoned and Established Economic Development Land and Uses	122	Support	The Housing Executive believes that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities. The Housing Executive supports the presumption against the alternative use of land zoned for economic development, which aligns with the RDS principle to maintain an adequate supply of employment land throughout the Plan period. We welcome the policy requirement that development proposals in the vicinity of an existing or proposed economic development use must be compatible with that use. This will ensure that local residents are not adversely affected by any industrial emissions, noise or heavy traffic. We would also like to see the Policy state that if employment land is to be released for alternative uses; it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the District. We welcome the commitment in paragraph 9.46 to undertake an annual review of the uptake of the Council's economic development land.
ED 5 – ED 7 Economic Development in the	124	Support	In respect of economic development in the countryside, we support the guiding principle to provide opportunities likely to benefit and sustain the rural community, while protecting or enhancing the character of the rural area.

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Countryside			
City / Town Centres, Retailing, Offices, Leisure and Other Uses			
RP 1 – RP 10 Retailing	131	Support	We strongly welcome these policies, which promote the regeneration of our city, and town centres as quality places to live, work, shop and visit. We support the town centre-first approach advocated in policy RP 1 to help ensure that town centres are vibrant, mixed-use areas, which reflects policy within the SPPS. We welcome the reference to residential properties in paragraph 10.12 as this use can help promote the vitality and viability of centres.
		Representation	We support policies RP 2, 3, 8 and 10; however, we would also like to see residential use promoted within existing town centres as well as commercial, business or community uses. We would like to see residential use specified as a main town centre use, as diversity of uses in town centres, including housing, will help enhance their vitality and viability. We believe that residential use on the upper floors of retail properties is appropriate within town centres, as Town Centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration. This will help promote accessible retail and services, an important element of sustainable communities.
Transport and Movement			
Strategic Objectives & Operational Policies TAM 1 – TAM 12	145	Support	The Housing Executive supports the Council's LDP Strategy in accordance with the Local Transport Study (LTS) as set out in paragraph 11.11. The LDP has a pivotal role to play to help ensure that the aspired transport and movement vision for the District is fully realised. We note that the seven objectives of the LTS have been developed to support the achievement of the objectives set out in the draft PFG.
			We strongly support the actions to promote sustainable transport and other

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			<p>infrastructure within the Council area, such as active travel/walking and cycling provision, park and ride/park and share/park and stride facilities, and greenways and disused transport routes.</p> <p>We believe these will promote the integration of transport and patterns of development, which reduce the need to travel, promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times.</p> <p>The Housing Executive strongly supports policy TAM 1 as this will ensure that accessibility is integrated into the design of development proposals, which will help promote social inclusion and meet the needs of people of different ages and abilities.</p> <p>We would like some flexibility on parking standards for social housing schemes specifically due to lower car ownership levels for social housing, than other tenures of development, (55% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%).</p>
AGR 1 – AGR 3	212	Support	
Agriculture & Other Development in the Countryside			
<p>The Housing Executive supports the policy aims to facilitate agricultural and other suitable rural development in the countryside in sustainable locations. We believe that such development is important for sustaining rural communities, provided it is of an appropriate scale and does not compromise rural character and the environment.</p>			
Part D Social Designations - -- Strategy, Designations & Policies			
Housing in Settlements and in the Countryside			

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Summary of Land for Delivery of Housing (Table 9)	223	Representation	While paragraph 16.13 states that there is ample housing land available within the District's settlements, we would like it noted that there are areas of high localised affordable housing need where it may be difficult to develop suitable sites. For example, there is a lack of opportunity for development across all tenures in the area south-west of the Derry City Centre. We would like the Council to consult with the Housing Executive in relation to locations where a housing need could be met beyond a local area, while Culmore is a separate settlement from Derry City we consider it part of the Westbank Housing Area and we would continue to welcome affordable housing proposals within the settlement.
HOU 1 Strategic Allocation and Management of Housing Land – Zoned Housing Land and LUPAs	225&226	Support	<p>The Housing Executive generally supports the strategic allocation of housing land. In particular, we welcome the exceptions; to allow Phase 2 land to be released at an early opportunity and to identify additional land, including outside an SDL, where it provides affordable housing (social and intermediate) according to a need identified by the Housing Executive. These exceptions will help address the high affordable housing need in the DCSD area.</p> <p>The Housing Executive strongly supports mixed tenure development and we would like to see a reference to mixed tenure within this Policy, as a way to provide affordable housing within a balanced and sustainable community. However, while we believe the exceptions for affordable housing could be an important way to meet localised need, we would not like to see these used to provide large scale affordable housing developments, minimising the opportunity to create a balanced community. Rather, we would like to see a proportion of affordable housing to be required in all residential developments over a certain threshold, as outlined in HOU 5, in order to help address affordable housing need in a sustainable way, limiting the need for exceptions to</p>

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			<p>be applied.</p> <p>We understand that Phase 1 land will be mainly made up from existing commitments and that it will be difficult to retrospectively place a proportion of affordable housing on these sites. In these instances, we would welcome discussion with applicants on the potential for an element of affordable housing to be included as part of their scheme.</p>
<p>HOU 2 Strategic Allocation of Housing In Settlements other than Zoned Housing Land and LUPAs</p>	<p>229</p>	<p>Support</p>	<p>The Housing Executive supports this policy, which will help meet the RDS target for residential development on brownfield land. The Housing Executive supports development on brownfield land, where suitable for housing, as these locations within settlement limits are more likely to be accessible to public transport and services than greenfield sites. While we welcome the exception to OS 1, to release some open space to meet housing need, we believe this should be in instances of unforeseen housing need during the Plan period. We would like to see any existing open space, where there could be potential for small scale development, in order to provide a decisive community benefit, be subject to planned re-designation as part of the LPP stage.</p>
<p>The LDP Strategy for Urban Housing</p>	<p>230</p>	<p>Support</p>	<p>The Housing Executive strongly welcomes this Strategy, which supports a mix of housing in a range of sizes and tenures. This will help meet housing need for all households and will help promote cohesive and sustainable communities.</p>
<p>HOU 3 Density of Residential Development</p>	<p>230</p>	<p>Support</p>	<p>The Housing Executive supports the identified bands of density for residential development, promoting higher density in areas, which will have access to services and facilities. This will help reduce the need for greenfield sites and more compact urban forms that can help encourage sustainable travel. It should be noted that social housing development is generally at a higher density</p>

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			<p>than private housing, we would like this to be considered when assessing urban design and densities within planning applications.</p>
HOU 4 Protection of Existing Residential Accommodation	232	Support	<p>The Housing Executive supports this policy, which will protect existing housing stock; this will prevent rising housing need due to the loss of housing units.</p>
HOU 5 Affordable Housing in Settlements	233	Objection	<p>While we support many of the elements contained within this policy, we would like to see changes, in order that the range of housing need can be effectively addressed, therefore we are objecting to the HOU 5 in its current form.</p> <p>The Housing Executive has identified an affordable housing need of approximately 4,750 units over the plan period. While paragraph 16.46 states approximately 4,400 units can be provided for, as they are under construction, have planning permission, or can be accommodated on zoned land, we would like it noted that those sites under construction or with planning permission are already discounted from the housing need assessment.</p> <p>Due to the high housing need within Derry and Strabane, with the affordable housing need equating to just over 50% of the proposed 9,000 overall housing growth over the Plan period, we believe the 10% cannot meet an adequate proportion of affordable housing need, including the need of households in housing stress. A higher proportion of affordable housing would better meet housing need and provide more affordable housing within a mixed tenure context, limiting the need for affordable housing exceptions, contained within HOU 1, to be applied.</p> <p>While we support the provision that this proportion could be uplifted, we believe this would need to be set in Key Site Requirements for zoned housing</p>

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			<p>sites in the LPP and would not apply to windfall. As affordable housing need is high, we believe that uplifts may be required for many zoned sites, providing uncertainty for developers.</p> <p>We have concerns with the proportion that all housing schemes will be expected to have no more of a maximum of 70% of either private or affordable housing. We would like to see “private or affordable housing” changed to “social, intermediate and private” so that the policy is not in conflict with paragraph 16.56. The Housing Executive believes that sites identified for affordable housing can support mixed tenure if both social and intermediate housing are included within a scheme. Intermediate, shared ownership housing can be considered as part of the owner occupied market, and will fully enter the owner occupied market, once “stair-cased out”. This seems to be supported by paragraph 16.56.</p> <p>Without the change from “private or affordable housing” changed to “social, intermediate and private” in the third paragraph of the Policy, we would have concerns with this Policy. We believe the 70% proportion does not align with the 10% requirement of affordable housing on private sites. The affordable housing requirement means 90% of a housing site could be market housing, meaning the 70% requirement would not be met. This will cause uncertainty for applicants of private housing, who would not know whether a 10% or 30% requirement of affordable housing would need to be met. We would also like clarification on whether the 70% figure would be applied to affordable housing exceptions, outlined in HOU 1.</p> <p>The Housing Executive strongly supports mixed tenure and we would like to see an appropriate balance of tenures across Derry and Strabane, but we believe that tenure mix may best be considered on a site-by-site basis. It can be difficult</p>

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			<p>to put an exact figure on this, especially on sites with a low threshold, as the tenure mix of the surrounding area also needs to be taken into account in a holistic way, to consider how a balanced community can best be supported.</p> <p>Without an increase of the proportion of the 10% affordable housing requirement, we do not believe affordable housing need can be adequately met by the LDP, triggering the following soundness tests:</p> <p>C1: Did the Council take account of the Regional Development Strategy? The RDS under RG8 states that the varied housing needs of the whole community need to be met. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone and that development plans should take account of the HNA to “manage housing growth to achieve sustainable patterns of residential development”.</p> <p>C2: Did the Council take account of its Community Plan? Derry and Strabane’s community plan, the Strategic Growth Plan, contains the key action to “Provide quality social and private housing in sustainable urban and rural neighbourhoods to meet the needs of our growing population”.</p> <p>C3: Did the Council take account of policy and guidance issued by the Department? The SPPS states that the Housing Executive’s HNA provides an evidence base that must inform the housing allocation in LDPs, in order to influence a reasonable mix and balance of housing tenures and types.</p>

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			<p>C4: Has the Plan had regard to other relevant plans, policies and strategies, relating to the Council's district or to any adjoining Council's district? The PFG Outcome 8 "We care for others and we help those in need" and Outcome 13 "We connect people and opportunities through our infrastructure" contain indicators 8 and 48 to "turn the curve" in relation to the number of households in housing stress and to address the gap between the houses we need and the houses we have.</p> <p>CE2: The strategy, policies and allocations, are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base. As the proposed Affordable Housing Policy is not expected to have sufficient ability to meet the need identified in the HNA we do not believe the Policy takes sufficient account of the HNA and, therefore, is not founded on a robust evidence base.</p> <p>We would also like statements within the Policy box and paragraph 16.50, to state if need has been met or decreased, this will need to be confirmed by the Housing Executive. In addition, we would like to see an amendment to the second sentence of the Policy box to state that the housing mix can be determined "with regard given to consultation with the NIHE and with its up-to-date analysis of demand, including housing stress and prevailing housing need".</p>
HOU 6 House Types, Size and Tenure	237	Support	<p>The Housing Executive supports the Policy, which can assist the Council meet the SPPS and RDS requirements to meet the housing needs for all. A range of houses can provide appropriate housing for different household groups, such as families and older people thereby promoting social inclusion.</p>

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HOU 7 Accessible Housing	239	Support	<p>The Housing Executive strongly supports this Policy.</p> <p>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>Standards for Lifetime Homes and wheelchair housing are already in place in Northern Ireland for social housing developments. However, this Policy can help address a lack of accessible housing, for households who wish to live independently in private sector accommodation.</p> <p>Lifetime Homes</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. 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>

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HOU 8 Quality in New Residential Developments	241	Support	<p>Wheelchair Housing</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>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>
			<p>The quality of our homes and neighbourhoods has a significant influence on our health, happiness, confidence, social life, relationships with our families and general well-being. Therefore, the Housing Executive supports this policy to ensure that new residential development is of high quality design within attractive and sustainable neighbourhoods.</p> <p>We welcome the proposal that all new dwellings areas should be built to a space standard, to be included in an SPG. The Royal Institute of British Architects states space in housing has a significant ongoing effect on quality of life and "A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, and exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion".</p> <p>We support the requirement for adequate open space provision in new</p>

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			<p>residential developments, which is particularly important for new family dwellings. We would welcome a statement stating that open space should be in a variety of formats dependent on the type of residential units proposed.</p> <p>The Housing Executive believes there is an opportunity for the Policy to promote energy efficient homes and buildings that can easily incorporate renewable energy technology such as heat pumps and solar panels. We note that in England, fossil fuel boilers in new homes are being phased out by 2025, so we would like to see renewable heating sources and carbon neutral homes encouraged within the dPS.</p>
HOU 9 Design Concept Statements, Concept Master Plans and Comprehensive Planning	243	Support	<p>The Housing Executive supports the requirement for Design Concept Statements and Concept Masterplans to be submitted as part of a planning application for residential development. We believe this will help achieve a place making approach and ensure that proposal has been formulated in line with LDP Policy. We also believe the use of Planning Agreements can support the effective implementation with policy, can ensure the delivery of necessary infrastructure, thereby providing place management.</p>
HOU 10 Residential Extensions and Alterations	245	Support	<p>The Housing Executive supports the proposed policy on extensions and alterations, which can enhance the flexibility, resilience, and endurance of a dwelling, allowing it to adapt to different users and their needs.</p>
HOU 11 Development of Existing Buildings or Infilling of Sites for Housing	248	Support	<p>The Housing Executive supports the protection of quality environments and distinctive patterns of development and character, which help provide a sense of place of an area.</p>

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HOU 12 Flats and Apartments	249 & 250	Support	The Housing Executive believes HOU 12 will promote choice, to meet a range of need and demand, supporting enduring buildings and sustainable development. This policy provides flexibility allowing the conversion of buildings to meet demand for additional housing solutions or for commercial space. This will help prevent areas of vacancy, underuse and dereliction and with the criteria for redevelopment in a comprehensive way, will protect and enhance environmental amenity.
HOU 13 & HOU 14 Houses in Multiple Occupation	251 & 252	Support	The Housing Executive supports this Policy HOU 13, which can provide additional affordable housing, especially for single households. We also believe the limitation of HMOs will be appropriate to ensure a balance of households within established residential areas. We believe the criterion of HOU 14 will help ensure that residents of HMOs live in suitable accommodation.
HOU 15 Specialist Residential Accommodation	253	Support	The Housing Executive supports this policy on Specialist Accommodation, which can assist our Supporting People Programme. Supported housing is for individuals who cannot live independently in their own home. They require extra housing support and/or an element of care, in addition to a home. Accommodation can take the form of self-contained or shared accommodation. The term “shared housing” is used to describe accommodation for two or more persons with shared facilities, e.g. bathroom, kitchen, communal living room or dining room. Shared housing can include clusters of dwellings, group homes or hostels. Supported housing need is identified, for a three-year programme, through a commissioning process with partners including the Housing Executive, the Health and Social Care Board, Health Trusts and the Probation Board.

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HOU 16 Travellers Accommodation	254	Support	<p>As Supported housing need is not projected on a long-term basis, we support that this development management policy in respect of specialist housing is included within the LDP. We would like to see the Policy recognise that some flexibility may be required in the application of residential design standards due to the specific nature of specialist accommodation.</p> <p>We welcome this policy to ensure that Travellers' needs are adequately catered for within the LDP. There is an opportunity for the Policy to refer to the Design Guide for Traveller Sites in Northern Ireland, the new Model Licence Conditions 2019 for Caravan Sites (published by Department for Infrastructure) and Draft Design Guide for Travellers' Sites 2019 (published by Department for Communities). Adherence to relevant guidance will assist in the delivery of high quality designed sites, improving living standards for Travellers, thereby improving health and wellbeing. The Housing Executive has responsibility to identify the housing needs of Irish Travellers.</p>
HOU 17 Large-Scale Managed Student Accommodation	255	Support	<p>The Housing Executive supports the criteria for student accommodation within this Policy.</p>
The LDP Strategy for Housing in the Countryside and Policies HOU 18-26	256 -275	Support	<p>The Housing Executive supports the Strategy and Policy to facilitate development that contributes to a sustainable rural community, while protecting and conserving the rural landscape, heritage assets and the environment.</p>
HOU 25 Affordable Housing in the Countryside	274	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</p>

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			<p>of policy HOU 25 will provide flexibility should need rise over the Plan period. We support the restriction that planning permission will only be given where applications are submitted by a Housing Association but we would also welcome the inclusion of the Housing Executive within this statement. We also welcome the inclusion that the Housing Executive will identify affordable housing need.</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the implementation of CTS5 of PPS 21. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when applying for planning permission under this Policy.</p> <p>We also note the restriction of this Policy on proposed areas of Green Belt. The Housing Executive would therefore like adequate land to be identified within SDLs, including the potential extension of a SDL, to meet affordable housing need. We would also like to see this closely monitored, in case there is increased need arising over the Plan period.</p>
The Council's LDP Open Space Strategy		Support	<p>Open Space, Sport and Outdoor Recreation</p> <p>The Housing Executive supports the intention to provide a strategic policy framework for the provision and protection of green and blue infrastructure within the Borough. We note Belfast City Council have produced a draft Green and Blue Infrastructure Strategy, an Open Space Strategy, and propose a range of new strategies and plans for Belfast open space. Therefore, we believe there may be an opportunity for the Council to develop further comprehensive open space strategies.</p> <p>The Housing Executive believes that master planning would provide a strategic approach in the creation of new open space that forms part of a network. We</p>

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			<p>believe that in strategic development sites, and in areas which are in an “accessibility hot spot”, potential open space areas could be allocated and protected within the Local Policies Plan of the LDP. The delivery of these sites could be funded by developer contributions. This would ensure a cohesive approach in the delivery of new and linked spaces, which are not subject to a reactive and possibly piecemeal approach.</p>
OS 1 Protection of Open Space	280	Support	<p>The Housing Executive strongly supports this policy to protect areas of existing open space. Open space is important in the creation of sustainable communities, as it is greatly beneficial to peoples’ health and wellbeing, helps to create a quality living environment, provides opportunities for play, helps alleviate flood risk and encourages community cohesion. It can also support wildlife and biodiversity, improve connectivity and attract investment in the economy.</p> <p>The Housing Executive supports the policy presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that outweigh the loss of the open space. We strongly welcome the inclusion of the provision of affordable housing included as an example of a substantial community benefit. We would like to see that where any affordable housing is proposed as an exception, that applications are restricted to a Housing Association and the Housing Executive.</p> <p>We believe, however, that there is a higher test for Exception 1, of the two exception tests, despite that Exception 1 is required to provide a “substantial community benefit”. There is no requirement for proposed Exception 2 cases, which do not provide a “substantial community benefit”, to provide a comprehensive development plan or to provide additional facilities for</p>

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OS 2 Public Open Space in New Developments	284-286	Support	<p>“community betterment”. This means that applicants who wish to provide a substantial community benefit have to comply with more onerous conditions than a private developer. As, under Exception 1 there may be a requirement, similar to Exception 2, to provide alternative open space, in this instance, there would be no reason to use Exception 1 as a route to development, even if it was to provide a community benefit such as to provide a home to households in housing need. Rather, an applicant could use the Exception 2 route and need not fulfil the criteria to provide additional facilities for “community betterment”.</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the operation of the open space exception policy in PPS 8. We believe the criteria in this Protocol were proportionate and would like to see consideration of these criteria to be included within the Policy. We would also like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p>
			<p>The Housing Executive welcomes these policies in relation to the provision of public open space. We support the requirement for the provision of adequate, integral public open space in new residential developments of 25 units/1 hectare or more. We believe the provision of open space and its long-term maintenance and management is important in the creation of sustainable communities, as it is greatly beneficial to peoples’ health and wellbeing and encourages community cohesion. We welcome the statement that a sufficient equipped children’s play area exists within a reasonable walking distance. In addition, we would like to see a requirement that such play areas are easily accessible, to meet the needs of disabled people and those children can access them safely, for example, using pedestrian crossings. These spaces, and safe routes to them, should be explicitly planned into residential areas and town</p>

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			<p>centres.</p> <p>The Housing Executive recognises that play is critical to the lives of children and young people, contributing to their social, physical and emotional health and well-being as well as supporting learning and skills development. The Right to Play is enshrined in the UN Convention on the Rights of the Child (UNCRC 1989), Article 31 which states that all children and young people have the right to play and engage in recreational activities appropriate to their age. As signatories to the UNCRC, all branches of UK government have a responsibility to work towards delivery of the Right to Play.</p> <p>This commitment to delivering the Right to Play is emphasised regionally through The Children’s Services Co-operation Act (2015) and the emerging Children and Young People’s Strategy (2017 to 2027). Additionally one of the draft Programme for Government key high level outcomes is “We give our children and young people the best start in life”; many of the other PFG outcomes are related by the right to play in cross cutting benefits to health, education and the environment.</p> <p>New development should usually conserve wildlife habitats, existing trees and quality vegetation. It should promote further biodiversity by providing open space with uncultivated areas and green corridors. Natural rewilding is an effective way of producing rich habitats and can recover biodiversity loss.</p>
OS 3 Green and Blue Infrastructure	289	Support	<p>The Housing Executive agrees with the policy approach to protect and enhance greenways across the Council area, which will form part of a multi-functional green and blue infrastructure network. This will help support active travel, which can improve health and wellbeing, as well as reducing congestion,</p>

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Open Space Policies OS 4 - 8	290 - 296	Support	pollution and greenhouse gas emissions. Disused Transport Routes or Community Greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles, also opening up the countryside, providing wildlife corridors, attracting visitors and providing economic benefits. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated, to create a network of traffic-free routes. In order to promote further the use of greenways, we believe that bike stations along greenways could further connect people, and encourage people to cycle, over a longer distance than walking.
CI 1 Community Infrastructure	299	Support	The Housing Executive welcomes this Policy to support the allocation and protection of land for education, health, community and cultural facilities as these are necessary components of sustainable communities. In addition, we believe the uplift in land values generated by the granting of planning permission should help fund additional community infrastructure that can contribute to people's well-being.
Community Infrastructure			
Part E Environment – Strategy, Designations & Policies Natural, Coastal and Historic Environment			

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Natural, Coastal and Historic Environment Strategies and Policies NE 1 – HE 9	325 - 362	Support	<p>The Housing Executive supports policies that protect our coast, natural and built heritage assets and resources. These will help contribute to the quality of life of residents, promote and maintain local identity, act as a stimulus for regeneration and provide opportunities for recreation, education and tourism.</p> <p>The Housing Executive supports a precautionary principle when determining the impacts of development on environmental and heritage resources, and support the use of The NI Biodiversity Checklist as recommended in the Natural Heritage policies, to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests.</p> <p>The consideration of biodiversity issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be 'built in' to a project by developers and will also assist planning authorities in considering the potential impacts of development proposals on biodiversity interests. We believe that additional biodiversity can be proactively enhanced through the development management process, for example, by providing habitats for animals and birds, such as the incorporation of swift nest bricks in new developments.</p> <p>We welcome policy HE 8 Conversion and Reuse of Non-Listed Vernacular Buildings as we believe that underused and vacant unlisted locally important buildings or vernacular buildings have the potential to become catalysts for regeneration, through sympathetic adaptive reuse. This sustainable approach preserves important elements of identity and local distinctiveness.</p> <p>The Housing Executive also welcomes Policies that help protect the coast from unacceptable development but would allow development that provides public</p>

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Renewable and Low Carbon Energy Development			
The LDP Strategy and Policy RED 1 for Renewable and Low Carbon Energy Development	367 -372	Support	The Housing Executive, as the Home Energy Conservation Authority for Northern Ireland, supports maximising the opportunities to develop renewable energy generation facilities in appropriate locations, as these can bring many social, economic and environmental benefits. Renewable energy schemes can reduce fuel poverty for local people and help improve air quality, thereby increasing and protecting health and wellbeing.
Development and Flooding			
The LDP Strategy and Policies for Development and Flooding	378 - 393	Support	Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. We welcome policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We support actions which can increase resilience to climate change and which are important ways to assist flood prevention. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We welcome the need for drainage assessments to be provided for all new residential developments in areas where there is evidence of/potential for surface water flooding and in other circumstances as specified in policy FLD 3. We support the promotion of the use of Sustainable Urban Drainage Systems, which can be used effectively to manage surface water run-off by, for example, the use of green roofs/walls, tree pits and swales, which help integrate green and blue infrastructure into the public realm/buildings and enhance nature conservation and biodiversity.

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Part F Place – Making and Design Vision			
Place-Making & Design Vision For Development in the District			
Place-making & Design Vision for Development in the District	399	Support	<p>The Housing Executive supports a place-making approach, which links to urban design, ensuring that buildings are not to be looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area.</p> <p>We welcome the design and place-making vision for the District, which includes 6 overarching Place-making & design objectives (PDOs), 18 Place-making & design Principles (PDPs) and Strategic Design Policies (SDPs) for Derry, Strabane, Local Towns, Villages, Small Settlements and the Countryside. We support this design and place-making vision for the District, as the locally specific policies (SDPs) in conjunction with the PDOs and PDPs, will complement other relevant policies within the LDP, and help deliver sustainable, locally distinctive, high quality design proposals across the District.</p>
Part G Place – Specialised Requirements			
Developer Contributions and Community Benefits			
Developer Contributions	455 & 456	Support	<p>We strongly support the introduction of Developer Contributions, within the dPS, which means that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The Housing Executive would also like to see a developer contribution to help provide affordable housing. Developer contributions for affordable housing would enable government to deliver housing to match unmet housing need, and help to achieve balanced communities through mixed tenure housing, and</p>

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			<p>would reduce the need for housing association grant. This reduction in grant would support a larger programme of new build development, thereby further helping to address housing need within the Council area. The Housing Executive would welcome an opportunity to meet with the Council to discuss further progressing a developer contribution policy for affordable housing and how this could be implemented.</p> <p>In addition, we support the statements that a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.</p>
Regeneration / Comprehensive Re-Development			
Regeneration / Comprehensive Re-Development	459 & 460	Support	<p>The Housing Executive welcomes working with the Council to support regeneration in Derry and Strabane through the Local Development and Community Plans. The Housing Executive has a long history of successful regeneration and as a landlord and landowner, provides physical regeneration through stock management and improvements, environmental improvements to estates, including enhancing open space areas through planting and by providing space for facilities such as community allotments.</p> <p>We also provide regeneration and support to local communities through Community Asset Transfer and strategies on Community Safety, Good Relations, Community Involvement and our Social Enterprise Strategy with approximately 20 social enterprises supported by the Housing Executive in Derry and Strabane in 2018. We also provide community grants and administer programmes such as "Housing and Heritage" and DFC's "Small Pockets of Deprivation Programme".</p> <p>In addition, we believe mixed tenure development can encourage regeneration</p>

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			by allowing people of different backgrounds to live together, thereby strengthening community cohesion.
Part H Place – LDP Monitoring and Review			
Monitoring Criteria and Review Process			
Monitoring Criteria and Review Process	471	Support	The Housing Executive would welcome assisting the Council through a housing working group and meetings on the implementation and monitoring of the draft Plan Strategy Policies, especially HOU 5 “Affordable Housing”. We also welcome the statement in paragraph 40.6 that affordable housing need will be monitored throughout the Plan period. As the Housing Executive monitors affordable housing need on an annual basis, we would like to assist the Council in this process.
Appendices			
Appendix 7 Glossary of Terms & Abbreviations			
Appendix 7 Glossary of Terms & Abbreviations	517-523	Representation	<p>The Housing Executive believes that the Policy proposals would be benefit from further clarification by including definitions for the terms:</p> <ul style="list-style-type: none"> • Affordable Housing; • Social Housing; • Intermediate Housing; • Committed housing sites; and • Whiteland.