



Local Development Plan Team
 Newry, Mourne and Down District Council
 Downshire Civic Centre Downshire Estate,
 Ardglass Road
 Downpatrick
 BT30 6GQ

12th September 2025

Dear Local Development Plan Team

Ref: NIHE Response to Draft Plan Strategy Representation

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

As a Statutory Consultee we welcome working with the Council on the preparation of the draft Plan Strategy. This engagement means that we support the Vision and Strategic Objectives and Policies contained within the dPS and believe these will provide a positive direction for the development and growth of Newry Mourne and Down, to 2035 and the dPS will be central to promoting sustainable development, balanced communities and place making.

We believe that the Local Development Plan will play a key role to help achieve the Programme for Government priority to 'Provide More Social, Affordable and Sustainable Housing' and to meet the objectives contained in the Housing Supply Strategy to deliver 100,000 new homes including 33,000 social homes across Northern Ireland to 2039.

The Housing Executive, as the Strategic Housing Authority for Northern Ireland, has a primary interest in housing strategy and policy and, during 2024/25 with public sector housing investment, totalled £81.25m for Newry and Mourne District Council. However, we believe housing is cross cutting and has influence on, and is influenced by, economic, environmental and social issues, therefore, the Housing Executive submits comprehensive responses to draft Plan Strategies.

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

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

We support the Plan Objectives, in particular "To provide for approximately 11,000 new homes by 2035 across a mix of housing type, size and tenure in accessible locations".

We also welcome Policies HOU 5 and COU 3 which can facilitate the delivery of affordable housing to help address housing needs, including for those in housing stress.

We support HOU 5 which states a minimum 20% affordable housing will be required on sites of ten or more dwelling units or on a site of 0.5 hectares or more in Newry City and towns, and in villages and small settlements on sites of five or more units or 0.2 hectares or more. We believe this will help address affordable housing need. As there is a high level of committed housing sites, we believe that the ten/five-unit threshold is appropriate to maximise the number of sites to which the policy can be applied.

This policy approach will help ensure mixed tenure development and sustainable communities. This will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area-based deprivation.

We welcome the retention of a rural exceptions policy, COU 3, where a need has been identified by the Housing Executive. While we prefer affordable housing to be delivered through planned development, the inclusion of policy COU 3 will provide flexibility should need rise over the Plan period.

As the Housing Executive wishes to respond fully to the draft Plan Strategy, and while we understand an eight-week consultation for a draft Plan Strategy is a legislative requirement, we

welcomed the “soft launch” providing additional time to scrutinise the draft Plan in sufficient detail.

In addition, we have provided a response to the Supplementary Planning Guidance in relation to affordable housing and have enclosed a Housing Executive position and advice paper on the delivery of affordable housing through the Local Development Plan process.

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

Please see our detailed consideration of the dPS policies enclosed.

I trust this information is of assistance,

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Housing Executive Response to Newry, Mourne and Down District Council's Local Development Plan, Draft Plan Strategy

Policy	Page / Paragraph	Support / Objection	Comments
Policy Context	38-42	n/a	<p>The Housing Executive would like to see the inclusion of DFC's Housing Supply Strategy 2024-2039 included as a policy context. This was published after approval from the NI Executive in December 2024 and sets direction and actions to increase housing supply and, in particular, affordable housing supply. A key component of the Housing Supply Strategy includes considering "options around mixed tenure, place-shaping and the role of Local Development Plans in achieving this".</p> <p>We would also like to see reference to the Energy Strategy - Path to Net Zero Energy, published by DfE in December 2021, this sets out a pathway for energy to 2030 that will mobilise the skills, technologies and behaviours needed to take us towards our vision of net zero carbon and affordable energy by 2050.</p> <p>We also note that although, not available at the time of preparation the policy context could be updated by referencing new draft strategic documents including:</p> <ul style="list-style-type: none"> • NI Executive's Anti-Poverty Strategy 2025-2035, • Shaping Sustainable Places, • Northern Ireland's draft Climate Action Plan 2023-2027, • A draft Fuel Poverty Strategy (December 2024, will replace the extant Warmer Healthier Homes - a new Fuel Poverty Strategy for Northern Ireland 2011) • A Draft Circular Economy Strategy for Northern Ireland, • DfI's consultation on an Active Travel Delivery Plan (November 2024), and • A draft Transport Strategy to 2035.

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LDP Vision	48	Support	<p>The Housing Executive supports the LDP Vision, however as tackling climate change is a key challenge which could negatively affect people and communities, the economy and environment of NMD, we believe the Vision could include a reference to mitigating, adapting to and minimising climate change. For example,</p> <p>“Newry, Mourne and Down is a place with strong, safe, and vibrant communities, where people enjoy a good quality of life and equality of opportunity for all. A sustainable, climate resilient, well connected and high-quality place where our environment and cultural heritage are valued and protected to make the district an attractive place to live, work, invest and visit.”</p>
LDP Objectives	49-51, Table 3	Support	We welcome the LDP Objectives, in particular the objective “To provide for approximately 11,000 new homes by 2035 across a mix of housing type, size and tenure in accessible locations”.
PART 1: Spatial Growth Strategy and Strategic Policies			
Strategic Policy (SP) SP1 Sustainable Development and Climate Change	54	Support	<p>The Housing Executive strongly supports this policy, and the use of Sustainability Statements taking account of 8 criteria. While these will be required for major development, these could also be required for local development at locations where a climate impact is a risk.</p> <p>However, for point 3 “all new major development proposals will be expected to incorporate renewable/low carbon energy technologies to provide at least 10% of predicted energy requirements”. We believe that this policy should apply to all developments, and not just major developments, and that the 10% figure could be more ambitious and raised to assist with meeting the legally-binding net zero by 2050 target set out within Climate Change Act (Northern Ireland) 2022. For example, major residential development can be developed at nearly zero carbon standards. Building to high energy standards now will futureproof new builds, as there will be no need to retrofit to achieve Net Zero. There are increasing numbers of developments in Northern Ireland achieving EPC A ratings. Passive Housing standards also help to address fuel poverty</p>

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			<p>thereby improving health and wellbeing in addition to reducing energy consumption and costs for occupants.</p> <p>We would also like to see a requirement included for the provision of electric vehicle charging infrastructure, to facilitate the transition to low/zero carbon vehicles which is an objective of the Energy Strategy and ensure that development can adapt to future needs.</p> <p>An additional criterion could also be included which requires biodiversity to be enhanced.</p> <p>The policy could also emphasise the promotion of the sustainable transport hierarchy which aims to prioritise pedestrians and cyclists, followed closely by public transport. Other active travel measures such as bike and e-bike rental schemes, wheeling, travel cards and provision for shared transport such as car, bike and lift share schemes could be promoted. We note that the Climate Change Act sets a target for a minimum spend of 10% of overall transport budgets on active travel and DfI's long-term vision is to create a seamless, integrated network that allows more people, regardless of age or ability, to choose active travel.</p>
Strategic Policy SP2 Enhancing Design and Place Shaping	58	Support	<p>The Housing Executive supports this policy to ensure good quality design and a place making approach to development, which will provide a sense of place, attract investment and improve well-being.</p> <p>We believe that Place making is a people centred approach to the planning, design and management of places to strengthen the connections between people and the places they share. Development should be sensitive to the context of an area and to the uses and activities of an area. We believe there could be additional criteria that applicants should engage and collaborate with local people to create developments that contribute to a shared vision for areas and neighbourhoods, rather than simple consultation. This approach will help to provide understanding of the local context of a place, how people use a space, the local activities and movements that take place. Community involvement helps enhance a sense of community, belonging and the sense of ownership, resulting in interventions that are popular and long lasting.</p>

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Strategic Policy SP3 Developer Contributions and Planning Agreements	62	Support	<p>The Housing Executive strongly supports SP3 which states development may be subject to a developer contribution and that contributions can be sought for affordable housing.</p> <p>The Housing Executive recognises policies for developer contributions ensure the uplift in land values, generated by the granting of planning permission, is used to promote sustainable communities through wider social benefits to local people. Developer contributions have been long established in Great Britain and Ireland to contribute to the provision or upgrading of critical public infrastructure, including water and for education, health, utilities, and to help fund affordable housing. A developer contribution for affordable housing provision would help provide much needed affordable housing, including social housing.</p>
SGS1 Spatial Growth Strategy	67	Support	<p>The Housing Executive agrees the Spatial Growth Strategy should focus growth on the main hubs, Newry City and the main town of Downpatrick with balanced growth in local and small towns, while sustaining rural settlements. We believe this can promote sustainable patterns of development and enable aligning housing use with employment, facilities and services to provide connectivity and accessibility.</p>
Strategic Designation SETT1 Settlement Hierarchy	71	Support	<p>The Housing Executive supports the settlement hierarchy and the new designations of Saintfield, Killyleagh and Castlewellan as local and small towns. We believe the level of services and population are in line with the Regional Development Strategy's (RDS) Hierarchy of Settlements and Related Infrastructure Wheel. This will also provide more of opportunities for growth of settlements such as Castlewellan where there is high number of people in housing stress on the waiting list.</p>
Strategic Designation SETT2 Settlement Development Limits	74	Support	<p>The Housing Executive supports a presumption for development within settlement limits if in accordance with zoned sites and development is sensitive to the size and character of the settlement.</p>
Strategic Housing Allocation	78	Support	<p>We recognise that the future housing need and allocation of housing growth across the district is in line with the Strategic Planning Policy Statement (SPPS) indicators including the Housing Executive's strategic Fifteen Year Housing Market Assessment (HMA) (also known as the Strategic Housing Market Analysis). The HMA is an important evidence base for the Plan Strategy as it</p>

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			provides a tenure breakdown of the overall housing need into market, intermediate and social over the Plan period and the new dwelling requirement includes a backlog component of existing unmet need. We welcome that the Plan Strategy has uplifted the growth figure than that in the HGIs, establishing the level of need by taking account of the HMA housing need figures. With the application of a 10% flexibility allowance, the subsequent identification of a requirement for 11,000 new homes over the LDP period (733 per year) would contribute to meeting the NIHE overall medium growth requirement. We believe this higher figure is suitable due to the growing numbers of homeless households.
LDP Objectives for Housing	82	Support	The Housing Executive supports the Plan Strategy housing objectives in particular, mixed tenure housing, to support the regeneration of disadvantaged and deprived areas and reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding, coastal erosion or land instability.
Strategic Policy HS1 Housing Land Allocation	83	Support	<p>The Housing Executive supports the allocation of land for housing which is in line with the Spatial Growth Strategy and the settlement hierarchy and takes account of the HMA growth figure. We believe this will support sustainable development and sustainable communities.</p> <p>While we support HS1 we would like to see sufficient land allocated to help address social housing need. As Castlewellan is now designated as a small town, we believe that there is an opportunity to accommodate additional housing beyond the 44 units specified. The 5-year projected need for Castlewellan for the period 2024-2029 is 120. An additional allocation could help address housing need and would be in accordance with spatial growth strategy.</p>
Strategic Policy HS2 Protection of Zoned Housing Land	84	Support	The Housing Executive supports this policy, which will protect housing land, to meet housing need over the Plan period and to ensure there is adequate housing land to meet need. We understand that subordinate ancillary uses may be necessary to provide sustainable communities.
Strategic Policy HS3 Management of Housing Supply	86	Support	The Housing Executive supports the management of housing supply, which includes a sequential approach and the phasing of housing land. We especially welcome the flexibility where it is demonstrated that there is insufficient Phase 1 housing land to meet affordable housing needs,

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			and where this is supported by the Housing Executive, consideration will be given to the release of Phase 2 lands with priority given to sites with greater accessibility and where necessary infrastructure is in place
LDP Objectives for the Countryside	89	Support	We support the objectives for the countryside to protect sensitive landscapes while accommodating sustainable growth that meets the needs of rural communities.
Strategic Policy CS1 Development in the Countryside	90	Support	The Housing Executive welcomes the inclusion of affordable housing as acceptable development in principle in the countryside.
LDP Objectives for Open Space	93	Support	The Housing Executive supports the objective for open space, in particular that quality public spaces are accessible to all.
Strategic Policy OSS1 Protecting and Enhancing Open Space	94	Support	The Housing Executive supports the protection and enhancement of open space. Open space contributes to physical and mental health as well as promoting community engagement, providing opportunities for wildlife and biodiversity and providing an attractive environment. We welcome that the policy will promote open space as an integral element of housing developments, green and blue infrastructure to provide active travel corridors and greenways and the provision of community growing spaces and allotments. We believe these will contribute to a sense of place and peoples' wellbeing. We would like to see more of an emphasis on the importance of open space in improving environmental quality and climate resilience, for example, air quality, urban cooling and flood alleviation.
LDP Objectives for Economic Development	101	Support	We welcome the economic objectives including to provide suitable land for economic development where it is "accessible to all members of the community, including those without a private car".
Strategic Policy EDS1 Employment Land Allocation	102	Support	We support the employment land allocation which promotes employment in a range of locations and to help address deprivation. We welcome the promotion of accessibility to employment opportunities for all.

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Strategic Policy EDS2 Protection of Economic Development Land	105	Support	Housing Executive supports this policy and that it refers to mixed use regeneration proposals which may include residential use and uses that bring a substantial community benefit. We would like social housing to be recognised as a substantial community benefit.
LDP Objectives for Retailing and Town Centres	107	Support	The Housing Executive supports the objectives relating to retail and town centres, including the promotion of a town centre first approach for retailing and other town centre uses, to achieve strong and vibrant city and town centres.
Strategic Policy RS1 Retail Hierarchy	110	Support	The Housing Executive supports the retail hierarchy. We welcome the town centre first approach and welcome that a range of different uses will be permitted in Newry City Centre and town centres, as a range of uses, including residential uses can increase vibrancy and resilience. We welcome the re-use of historic buildings for appropriate town centre uses and support policies which facilitate the conversion of existing buildings to residential use which encourage town centre living, subject to all detailed policy requirements being met.
LDP Objectives for Tourism	113	Support	We support the objective to promote sustainable tourism initiatives in appropriate locations.
Strategic Policy MS1 Minerals Development	117	Support	We support this policy which states that minerals development will be permitted if it is demonstrated it will not have an adverse impact on public safety or amenity.
LDP Objectives for Transport	122	Support	The Housing Executive supports the objectives for transport, including "Promote opportunities for sustainable travel including walking, cycling, and public transport and reduce the need to travel by private car". Due to lower car ownership levels for households in social housing, than other tenures, we strongly support the promotion of public transport and active travel networks to provide accessibility and connectivity for all.
Strategic Policy TRS1 Sustainable Transport	123	Support	We welcome the aim to improve connectivity through promoting the integration of sustainable transport and land use which supports a modal shift (such as walking, cycling, wheeling and public transport). This will be a key element to achieve targets to reduce greenhouse gas emissions and

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			to reduce air pollution. We would like to see the use of Active Travel Assessments and Public Transport Access Levels which measure proximity and frequency of public transport services influence the location and density of housing and services.
The LDP objectives for telecommunications and other utilities	126	Support	We support the objectives including to accommodate investment in public utilities and waste management. Increased investment is required for waste water infrastructure to prevent barriers to development. Investment in vital water infrastructure is also essential to environmental protection and public health.
Strategic Policy TUS1 Telecommunications and Other Utilities	127	Support	<p>We welcome policy that states that the provision of new and upgraded telecommunications and utilities infrastructure will be supported where there are no significant adverse impacts of the environment.</p> <p>We agree that a joined up approach with NI Water, the Council and other developers and infrastructure suppliers such as the Housing Executive will need to facilitate development to meet housing needs and the LDP's aim for growth. We would welcome discussions on mitigation measures and prioritisation for social housing development, as this provides a substantial community benefit.</p> <p>We welcome the requirement for proposals to seek to future proof new development to facilitate the installation of new technology and Council's continued liaison with SONI and NIE to ensure that the electricity transmission and distribution networks meet the district's energy needs over the LDP period as energy systems are increasingly electrified.</p>
The LDP objective for Waste Management	130	Support	The Housing Executive supports sustainable waste management and the use of the waste hierarchy.
Strategic Policy WMS1 Waste Management	131	Support	We welcome the management of waste that supports reuse and recycling, to minimise amounts of waste. We would like to see reference to a circular economy in which we rethink and reduce our use of earth's resources, we switch to regenerative resources, we minimise waste and we maintain the value of products and materials for as long as possible (Draft Circular Economy Strategy for Northern Ireland).

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LDP objectives for Renewable Energy	133	Support	The Housing Executive supports the objectives for renewable energy including to “support renewables infrastructure whilst affording protection to the environment” and “reduce vulnerability to climate change and prevent inappropriate new development in areas known to be at risk of flooding, coastal erosion or land instability.”
Strategic Policy RES1 Renewable and Low Carbon Energy	134	Support	We welcome the policy promotes energy efficiency measures as well as the use of renewable energy. As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive believes that new homes should be designed to be energy efficient, low/zero carbon, water efficient, and climate resilient. A future proofed home looking holistically to meet the changed climate, and demographic and social needs, will improve health and wellbeing, address housing inequality and fuel poverty, as well as helping to mitigate the environmental impacts of housing. RES1 states that the plan will support proposals for renewable and low carbon energy technology where it is demonstrated that it incorporates measures to improve energy efficiency and renewable energy technologies in all new developments including passive solar design. This is slightly unclear as it refers to “all new developments” whereas policy SP1 states “all new major development proposals will be expected to incorporate renewable/low carbon energy technologies to provide at least 10% of predicted energy requirements”. We believe it should be applied to all developments.
LDP objective for Flood Risk and Drainage	137	Support	The Housing Executive supports preventing new development in areas known to be at risk of flooding. In addition, we would like to see the objective include that development will be prevented where it could exacerbate flooding elsewhere. 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.
Strategic Policy FRDS1 Flood Risk and Drainage	138	Support	The Housing Executive supports the policy, which states a precautionary approach could be used where there is a risk of future flooding due to climate change or lack of water infrastructure. We also welcome requirements to provide sustainable drainage solutions, however, we would like to

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			see SuDS measures included in all built development, where appropriate. The RDS states “Developments in areas, even those outside flood risk areas should incorporate Sustainable Drainage Systems (SuDS).”
The LDP objectives for the Historic Environment	143	Support	We support objectives to protect and enhance the historic environment and assets. The historic environment helps promote a sense of place and belonging to an area, aids the wellbeing of residents by providing vibrant and sustainable communities and places, attracts tourists, acts as a stimulus for regeneration, tackles climate change through sensitive and adaptive re-use and provides leisure and educational value.
Strategic Policy ENVS1 Protecting, Conserving and Enhancing the Historic Environment	144	Support	We support designations within the LDP that can protect built heritage. We also believe that areas of local significance, that are now within a designation, or a listed building should be protected and if underused sensitive reuse should be promoted.
LDP objectives for Natural Heritage	147	Support	The Housing Executive supports the objectives for natural heritage and the recognition that the natural environment and biodiversity promote health and wellbeing. Similar to built heritage the natural environment can promote and maintain local identity, act as a stimulus for sustainable development and regeneration, increase climate resilience and provide opportunities for recreation, education and tourism.
Strategic Policy ENVS2 Protecting, Conserving, Enhancing and Restoring Natural Heritage and our Valued Landscapes	148	Support	We welcome designated areas that can protect biodiversity and landscapes. Northern Ireland is facing a significant biodiversity crisis, with the country ranked among the most nature-depleted in the world. Studies show a substantial decline in the abundance and distribution of various species, with some facing a high risk of extinction. This decline is attributed to several factors, which LDP policy can help address including habitat loss and degradation, pollution, climate change, and the spread of invasive species.
LDP objectives for Coastal Development	151	Support	We support the objectives for coastal development and that development should be sustainable and sensitive to the environment.

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Strategic Policy CDS1 Coastal Development	152	Support	<p>The Housing Executive also welcomes policy that help protect the coast from unacceptable development but would allow development that provides public access and environmental benefit. Policies can assist the regeneration of coastal areas and will encourage recreation leading to active lifestyles, promoting health and well-being of communities.</p>
PART 2 General Policy and Operational Policies			
GP1 General Policy	158	Support	<p>The Housing Executive welcomes this policy, which ensures quality developments that protect the environment and provide benefits to local people. The Housing Executive supports an approach where proposals will be granted planning permission where they contribute to sustainable development.</p> <p>We support the general policy which states all proposals should accord with criteria including “Safety and Safeguarding of Human Health, Wellbeing and the Environment”. In addition, we would like to see the inclusion of Health Impact Assessments for major development. These are often a requirement for planning applications in GB and they can help meet the SPPS and Community Planning objective to improve health and wellbeing. The Housing Executive recognises the importance of considering health as part of the planning process and that health impacts are considered in policy formulation.</p> <p>We welcome the aim to restrict air pollution. While the policy states air pollution can exacerbate pre-existing conditions, it should also be recognised that it can have causal effects. For example, air pollution from traffic emissions contributes to respiratory and neurological illness, depression, stress and premature death. In addition, while electric vehicles (EVs) contribute less to air pollution than petrol or diesel cars, in terms of exhaust emissions; they still produce non-exhaust emissions from sources like tyres, brakes, and road wear. The heavier weight of EVs can also lead to increased wear on these components, potentially offsetting some of the benefits of zero tailpipe emissions. Therefore, we believe there is a need to focus on reducing all car use to improve air quality. We note that the Sustainable Travel Hierarchy set out in the Energy Strategy</p>

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			<p>for NI places “substitute trips” at the top, followed by “shift modes” and finally “switch fuels”, the first two steps of which are aimed at reducing the amount of travel that people undertake using private vehicles (DfE, 2021).</p> <p>We welcome the reference to streets designed as places that prioritise people rather than vehicles. We support the integration of transport and patterns of development, which reduce the need to travel, as well as being more sustainable by reducing demand and travel times. We would like to see housing located in areas with nearby services and with good access to public transport, walking and cycling facilities. As well as contributing to the reduction of greenhouse gases and promoting active lifestyles, a reduction in car use can lead to communities that are more cohesive. Research shows that as people travel without cars; they interact with neighbours and use local shops and facilities. Developments which reduce car dominance in local streets encourage pedestrian and cycle journeys and make it safer for children to walk to school and play outside, should be promoted. Designing developments where pedestrians and cyclists are given priority help support better health outcomes and are more inclusive than car-centric environments.</p> <p>As car ownership levels amongst social housing tenants are significantly lower than the NI average, we welcome provision for active travel and public transport linkages in new developments, which have an important role to play in reducing inequalities and transport poverty by allowing people to access essential services via sustainable transport modes. In areas where car parking levels are reduced studies show that people are more likely to walk, cycle, or choose public transport for daily travel. We would like to see a requirement for car parking in new developments to be minimised to help promote safe, active travel, and increased modal shift, accompanied by appropriate active travel and public transport infrastructure. We support a requirement for Travel Plans, which include a range of measures to encourage sustainable modes of transport, such as Travel Cards - residents are incentivised to choose active travel or public transport over private car use. Other travel demand measures can be incorporated into new developments to reduce car reliance such as car clubs and bike share schemes.</p>

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			<p>Due to significant habitat loss, we strongly support the principle of biodiversity net gain. We welcome the promotion of nature-based solutions such as green walls and roofs, street trees and SuDS to assist with biodiversity net gain.</p> <p>We also support design solutions such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs.</p> <p>We welcome the reference to NI Water's pre-development enquiry service and would like to see a requirement for these to be submitted prior to the submission of any formal planning submission, as per NI Water advice, to ascertain the availability and capacity of mains infrastructure.</p>
Policy HOU1 Quality in Residential Development	167	Support	<p>The Housing Executive supports this policy, which will aid good design and place making. We also welcome a policy, which allows for increased density where appropriate and where close to services and public transport links, this will reduce the need to travel and will enable sustainable development, contributing to compact urban growth when implemented at the right locations</p> <p>While we welcome the proposal that all new dwellings should be built to a size standard, set out in Supplementary Planning Guidance, these standards accord to social housing space standards, which ensure that homes are large enough to meet the needs of occupiers. The Royal Institute of British Architects states space in housing has a significant ongoing effect on quality of life and "A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, 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 welcome the requirement for energy use to be minimised in all new developments; however, we believe that the 10% figure could be increased to help meet net zero requirements. In 2022, residential buildings was the fourth highest-emitting sector in Northern Ireland, accounting for 12% of Northern Ireland's emissions. The Climate Change Committee has recommended that the NI Executive puts in place requirements on housing developers ensuring no new properties</p>

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			<p>completed from 2026 use fossil fuel heating systems and that they deliver changes to Building Regulations with stringent transition arrangements which ensure that, from 2026, all new homes are built with low-carbon heating systems. (CCC, 2025 https://www.theccc.org.uk/publication/northern-irelands-fourth-carbon-budget/)</p> <p>We would like to see references to housing and neighbourhoods designed to accessible standards, all of which contribute to inclusive quality residential development. We would welcome reference to green and blue infrastructure provision under the “Public open space” heading as there is potential for developments to incorporate elements that positively contribute to the green and blue infrastructure network, including nature-based solutions and SuDS to improve biodiversity and climate resilience.</p>
Policy HOU2 Design Concept Statements and Concept Masterplans	173	Support	The Housing Executive supports the requirement for Design Concept Statements and Concept Masterplans to be submitted as part of a planning application for residential development. We believe this will help achieve a place making approach and ensure that 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.
Policy HOU3 Residential Extensions and Alterations	175	Support	The Housing Executive supports the proposed policy on extensions and alterations, which can enhance the flexibility, resilience, and endurance of a dwelling, allowing it to adapt to different users and their needs. We also welcome that there may be an exception to relax policy criteria to provide ancillary accommodation for people with disabilities.
Policy HOU4 Conversion or Change of Use of Existing Buildings to Flats or Apartments	177	Support	The Housing Executive supports this policy, and we specifically welcome the reference to Living Over The Shops, which can help promote the regeneration of town centres.

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Policy HOU5 Affordable Housing	179	Support	<p>We strongly support the affordable housing policy which meets the aims of the RDS, SPPS, and the LDP of providing a mix of tenures, to meet need and to create cohesive and balanced communities.</p> <p>We support the threshold of ten or more dwelling units, or on a site of 0.5 hectares or more and the minimum 20% affordable housing requirement in Newry City and towns, and the minimum 20% requirement in villages and small settlements on sites of 0.2 hectares or five or more units. We believe this will help address affordable housing need, while respecting the draft Plan's Spatial Growth Strategy. As there is a high level of committed housing sites, we believe that the ten/five-unit threshold is appropriate to maximise the number of sites to which the policy can be applied.</p> <p>We strongly welcome this policy which will help meet the aim of the Programme for Government 2024-2027 priority to Provide More Social, Affordable and Sustainable Housing, the Housing Supply Strategy 2024-2039 objective to Increase housing supply and affordable options across all tenures to meet housing need and demand, the draft Anti-Poverty Strategy 2025-2035 commitment to ensure access to good quality, affordable and sustainable homes and the RDS and SPPS aims to meet the housing needs of the whole community.</p> <p>This policy approach will help ensure mixed tenure development and sustainable communities. This will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area-based deprivation.</p> <p>We support that a minimum of 20% affordable housing provision will be provided on sites of 0.5ha or comprising of 10 units or more in Newry City and the district's towns, and on sites of 0.2ha or comprising of five residential units or more within the district's villages and small settlements. We believe this proportion and the policy thresholds will help to address affordable housing need. We welcome the lower threshold for villages and small settlements, where there is generally smaller scale development; a five-unit threshold is appropriate to maximise the number of sites to which the policy can be applied in rural areas.</p>

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			<p>We welcome that it is stated that the Housing Executive has a role in the identification of need and the applicant is advised to liaise closely with a Housing Association to discuss the affordable housing requirement.</p> <p>We support the policy statement in some instances there may be an acute localised need for a higher proportion of affordable housing and the minimum requirement may be uplifted on an individual basis. We would also like to see an option where the proportion of affordable housing can be adjusted through a key site requirement within the Local Policies Plan, which could be important in areas there is a high housing need.</p> <p>The policy's Justification and Amplification clarifies the affordable housing should not be distinguishable from general market housing element in terms of external design. We would like the word "external" included within the policy as some internal finishes or layouts may be different to meet DfC's Housing Association Design Guide and to achieve Value for Money.</p> <p>We would support the delivery of affordable housing being secured by a Section 76 planning agreement, with conditions used on outline applications, and some small schemes only. A planning agreement can include more detail, better ensuring the units are compliant with policy. The Housing Executive would welcome being consulted on the terms of S76 agreements.</p> <p>The Justification and Amplification states that process drawings will be checked to ensure the affordable housing as stipulated has been identified on the drawings and that the design of these units complies with the DfC's Housing Association Design Guide. It should be noted that the Housing Executive will check the social housing units comply with DfC's Housing Association Design Guide at programme approval stage, and not at planning application consultation stage, therefore advice that the applicant should liaise with a Housing Association should be strongly recommended.</p> <p>Within the policy, we would like to see reference made to the Intermediate Rent Policy and Homes for Intermediate Rent Design Standards. These can be found at</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>https://www.communities-ni.gov.uk/publications/intermediate-rent-policy-and-homes-intermediate-rent-design-standards.</p> <p>We welcome the inclusion of exceptions should it be demonstrated that the affordable housing provision on site is not viable. Viability appraisals should be prepared by a suitably qualified professional. In these instances, we would like to see exceptions stated in a sequential approach:</p> <ol style="list-style-type: none"> 1. A variation in the timing or tenure of affordable housing provision 2. New build affordable housing provided off site 3. Provision of a commuted sum <p>While we strongly support mixed tenure housing development, we welcome that the draft policy recognises that the provision of a site solely for affordable housing may be acceptable within small settlements in exceptional circumstances. However, we would like the policy to be flexible to permit 100% affordable housing, in exceptional circumstances, in smaller sites within larger settlements where need is high and the tenure characteristics of the surrounding area would allow for balanced communities.</p> <p>We recognise that in some circumstances, the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. The Housing Executive supports the general presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space.</p> <p>As this policy should be used by exception, we believe that any development on open space should be for substantial community benefit. As social housing is a substantial community benefit, we believe that the policy could restrict the exception to solely social housing. This exception could be used rarely, and on smaller scale proposals, and therefore would not lead to unacceptable tenure imbalance.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			We believe that supplementary planning guidance will help effective implementation of the policy and the development of units to meet need, and we have provided comments to the draft SPG to assist the Council in the preparation of guidance.
Policy HOU6 Housing Type, Size and Tenure	182	Support	<p>The Housing Executive strongly supports this policy, which will help meet housing needs in the district and will promote mixed tenure development in a range of sizes and types to help ensure balanced communities. Well-designed neighbourhoods provide a variety and choice of homes to suit all needs and ages.</p> <p>In the case of social housing, the size and type will be determined by the Housing Executive to reflect waiting list requirements and in accordance with the Housing Association Guide. The size and type of intermediate housing will be determined by the intermediate housing provider.</p>
Policy HOU7 Adaptable and Accessible Homes	183	Support	The Housing Executive strongly supports the policy criteria to help ensure new homes are adaptable, which will help the Council meet the SPPS and RDS requirements to meet the housing needs for all, and to promote development, which improves health and well-being. These homes will also promote social inclusion and meet the needs of people of different ages and abilities.
Policy HOU8 Specialist Residential Accommodation	184	Support	<p>The Housing Executive supports this policy on Specialist Residential Accommodation, which can assist our Supported 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.</p> <p>However, it should be noted that Specialist Residential Accommodation is often provided by the private sector, outside the Supporting People programme. The Housing Executive will not usually provide a statement of need for these units as there is a commercial element to these proposals.</p>

Policy	Page / Paragraph	Support / Objection	Comments
Policy HOU9 Accommodation for the Irish Travelling Community	185	Support	<p>We support this policy to ensure that Irish Travellers' needs are adequately catered for within the LDP. We welcome the reference to the Design Guide for Irish Traveller Sites in Northern Ireland, adherence to this guidance will assist in the delivery of high-quality designed sites, improving living standards for Irish Travellers, thereby improving health and wellbeing. It should be noted that the Housing Need Assessment, carried out by the Housing Executive is in relation to the housing needs of Irish Travellers, only.</p> <p>As the Housing Executive is responsible for the assessment of Irish Traveller accommodation needs, we suggest the start of the first paragraph of HOU9 be amended to reflect this, stating:</p> <p>“Where the Housing Executive determines there is a need for Traveller’s Accommodation...”</p> <p>The first paragraph of the Justification and Amplification could also be amended to state:</p> <p>“The Housing Executive, as the Strategic Housing Authority is responsible for the assessment of Irish Traveller accommodation needs; where there is a recognised need identified by the Housing Executive, the LDP will identify a suitable Irish Traveller site(s) within the Local Policies Plan which will allow for the provision of new facilities to meet any need that is likely to arise during the lifetime of the plan”.</p>
Policy COU1 – COU 8 Housing in the Countryside	186 - 196	Support	The Housing Executive supports these policy aims to facilitate development that contributes to a sustainable rural community and economy, while protecting and conserving the rural landscape, heritage assets and the environment.
Policy COU3 Affordable Housing in the Countryside	189	Support	We welcome the retention of a rural exceptions policy where a need has been identified by the Housing Executive. While we prefer affordable housing and Community Led Housing to be delivered through planned development, the inclusion of policy COU 3 will provide flexibility should need rise over the Plan period. The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the implementation of CTY5 of PPS 21. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when applying for planning permission under this Policy.

Policy	Page / Paragraph	Support / Objection	Comments
			<p>We would like to see the Housing Executive included as a potential applicant to this exceptions policy, as under the Revitalisation of the Housing Executive, we hope to contribute to new social housing supply via a new build programme, and have recently concluded a “new build” pilot in North Belfast with scope for further pilots.</p> <p>We note the Policy states that proposals could be accepted if applications are made by a Community-led organisation supported by the Housing Executive. The Housing Executive does not have any formalised role to identify need for Community-led housing. We can consider supporting any affordable housing element if this is to be provided by a registered Housing Association. We would like a definition of Community-led housing and more details set out on Community-led organisations and their structure. The Housing Executive would like to ensure that development proposals in the countryside from a Community-led organisation:</p> <ol style="list-style-type: none"> 1. Constitute affordable housing by adhering to LDP/DfC/SPPS definition and by partnering with a registered Housing Association; 2. These are equality assessed to avoid discrimination against minority populations; and 3. If housing allocations are restricted to local people with a tie to the area, how will this be defined and assessed. <p>We note that the Justification & Amplification refers to social and affordable housing, we would like to see this policy refer to social and intermediate housing as per the LDP/DfC/SPPS definition of affordable housing.</p>
Policy COU9 – COU 11 All Development in the Countryside	197	Support	The Housing Executive supports these Policies to promote sensitive design and development which respects rural character and landscapes and restricts urban sprawl.
Policy CF1 Community Facilities	202	Support	We support the allocation and protection of land for education, health, community and cultural facilities. The Housing Executive supports the protection of land for community and cultural facilities and public services. These services and facilities are necessary components of sustainable communities. We also support that community facility developments should promote active travel and travel by public transport.

Policy	Page / Paragraph	Support / Objection	Comments
Policy OS1 Protection of Open Space	204	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>We recognise that in some circumstances, the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. The Housing Executive supports the general presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space.</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. As social housing is a substantial community benefit, we believe that the policy could restrict the exception to solely social housing. This exception could be used rarely, and on smaller scale proposals, and therefore would not lead to unacceptable tenure imbalance.</p> <p>The Housing Executive, in conjunction with DOE, produced a Joint Protocol for the operation of the open space exception policy in PPS 8. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p>
Policy OS2 Public Open Space in New Residential Development	206	Support	We support this policy for the provision of open space in new residential developments. This is important to provide an attractive and healthy residential environment. We welcome the Policy states open space should be integral element of development and that it should be easy and safe to access. We support the reference to greening of areas which can contribute to health, wellbeing and quality of life and promote biodiversity and facilitate sustainable drainage. We

Policy	Page / Paragraph	Support / Objection	Comments
			welcome the reference to the creation or retention of woodland areas or other natural or semi-natural areas of open space as these assist biodiversity and provide valuable habitats.
Policy OS3 - OS7 Open Space, Sport and Outdoor Recreation	209 - 216	Support	We support these Policies which will help facilitate physical activity and promote health and wellbeing and that any adverse effects such as lighting and noise must be mitigated.
Policy OS8 Green and Blue Infrastructure	217	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, 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 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.</p> <p>We welcome the requirement for developments to incorporate elements that positively contribute to the green and blue infrastructure network, such as habitat enhancement, access to public open space and active travel networks, the use of SuDS and measures to mitigate and adapt to the effects of climate change.</p>
Policy OS9 Community Growing Spaces and Allotments	219	Support	We strongly support the development of Community Growing Spaces and Allotments, which can encourage healthy lifestyles and promote community cohesion.
Policy ED1 Economic Development in Settlements	223	Support	The Housing Executive welcomes the policy focus on employment growth within urban areas towns across the Council area. We welcome the sequential approach used to identify employment land, which directs employment to the City and towns first. The Housing Executive

Policy	Page / Paragraph	Support / Objection	Comments
			supports barrier-free employment locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. The availability of transport directly affects social mobility and employment prospects, particularly for those who live in areas with limited transport links. Therefore, we would like to see a statement which explicitly states that economic development sites that are accessible by good public transport links will be included in a sequential test. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the LDP.
ED2 – ED7 Economic Development in the Countryside	225 - 233	Support	In respect of economic development in the countryside, we support the Policies that to provide opportunities likely to benefit and sustain the rural community, while protecting or enhancing the character of the rural area.
Policy ED8 Development Incompatible with Economic Development Uses	234	Support	We welcome this policy which by not permitting adjacent incompatible uses to economic development can protect residential amenity. This will ensure that local residents are not adversely affected by any industrial emissions, noise or heavy traffic.
Policy RET1 – RET7 Town Centres and Retailing	235 -243	Support	<p>We strongly welcome these policies which promote the regeneration of our city and town centres as quality places to live, work, shop and visit. We support the town centre-first approach advocated in Policy RET1 to help ensure that town centres are vibrant, mixed-use areas, which reflects policy within the SPPS.</p> <p>We support policies RET1 to RET7; however, we would also like to see residential use promoted within Newry City and town centres as well as commercial, business or community uses. We would like to see residential use specified as a main town centre use, as diversity of uses in town centres, including housing, will help enhance their vitality, viability and resilience. We believe that residential use on the upper floors of retail properties is appropriate within town centres, as Town Centre living and LOTS can stimulate additional activity and footfall, thereby assisting regeneration. This will help promote accessible retail and services, an important element of sustainable communities and can provide additional affordable housing provision.</p>

Policy	Page / Paragraph	Support / Objection	Comments
Policy TRA1 Creating an Accessible Environment	270	Support	The Housing Executive strongly supports the policy criteria to ensure that accessibility is integrated into the design of development proposals, as this will help promote social inclusion and meet the needs of people of different ages and abilities.
Policy TRA5 Disused Transport Routes	277	Support	We strongly agree with the policy aim to protect disused transport routes identified in the Plan for reuse for transport or recreational purposes. Policies which support active travel can improve health and wellbeing and help mitigate the effects of climate change by promoting a modal shift away from the car. Transport Routes or Community Greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles, also opening the countryside, providing wildlife corridors, attracting visitors and providing economic benefits. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated, to create a network of traffic-free routes. In order to promote further the use of greenways, we believe that bike hire stations along greenways could further connect people, and encourage people to cycle, over a longer distance than walking.
Policy TRA6 Transport Assessment	278	Support	The Housing Executive supports the use of transport assessments to identify opportunities to enhance connectivity and accessibility. We also note that in Great Britain Active Travel Assessments and Public Transport Access Level assessments are used, we would like to see these incorporated within Transport Assessments to ensure these sustainable travel modes are given due regard.
Policy TRA7 Car Parking and Servicing Arrangements	279	Support	<p>We would like some flexibility in the application of parking standards in affordable housing schemes, due to lower car ownership levels for social housing, than other tenures of development.</p> <p>We welcome the reference to EV charging infrastructure in the J&A (page 281) and would like to see this made more prominent in the headline policy text and also included in other relevant policies including TRA9 and TRA10. The Energy Strategy acknowledges that a significant increase in public EV charge points in addition to home, on-street, workplace and destination charge points will be required to support the transition to EVs. The RDS includes "Use more energy</p>

Policy	Page / Paragraph	Support / Objection	Comments
			efficient forms of transport" including fuel efficient vehicles and vehicles which do not rely on fossil fuels, as a measure to mitigate climate change.
Policy TRA8 Active Travel	282	Support	The Housing Executive welcomes the promotion of accessibility and the encouragement of modal shift away from car use towards more sustainable and active transport choices, particularly as the majority of residents travel to work by car. We believe that new developments should be concentrated in locations with good access to public transport, walking and cycling facilities. As well as contributing to the reduction of greenhouse gases and promoting active lifestyles which are key aims in the SPPS, a reduction in car use can lead to communities that are more cohesive. Research shows that as people travel without cars, they interact with neighbours and use local shops and facilities. Developments should be promoted which reduce car dominance in local streets, encourage pedestrian and cycle journeys, and make it safer for children to walk to school and play outside. Designing developments where pedestrians and cyclists are given priority will help support better health outcomes.
Policy TRA10 Provision of Public and Private Car Parking	284	Support	We support the Policy reference to Park and Ride and Park and Share facilities, as Park and Ride/Park and Share Car Parks will help to contribute towards a reduction in car use and greenhouse gases, as well as the promotion of healthy lifestyles, which are key aims in the SPPS, a reduction in car use can also lead to communities that are more cohesive.
Policy TUC1 -TUC3 Telecommunications and other Utilities	287 - 294	Support	We recognise that access to high-speed broadband is essential for sustainable economic development and can help reduce social isolation and provide access to services. We therefore support this policy, which aims to facilitate the development of telecommunications and utilities infrastructure in appropriate locations while minimising the environmental impact of such infrastructure.
Policy WM1 - Policy WM5 Waste	295 - 307	Support	The Housing Executive supports the Policies on waste which will help to ensure there are adequate facilities and waste is managed and controlled, to safeguard human health and the environment.

Policy	Page / Paragraph	Support / Objection	Comments
			<p>We believe there is also an opportunity to promote a circular economy designed to minimise waste and maximize resource efficiency by keeping products and materials in use for as long as possible through reuse, repair or refurbishment, and recycling. This helps to protect the environment and reduce pollution. This can lead less waste being sent to landfills and incinerators and by reducing reliance on resource extraction, the circular economy can help to mitigate climate change.</p>
Policy RE1 & RE2 Renewable and Low Carbon Energy	308 - 314	Support	<p>The Housing Executive supports these Policies which aims to balance the economic/environmental benefits of renewable energy generating facilities with the need to minimise any adverse impacts on people and the environment.</p> <p>As the Home Energy Conservation Authority for Northern Ireland, we support 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.</p> <p>As stated in our response to Policy RES1, we believe that all new developments should be expected to incorporate renewable and low carbon energy technology. We also believe that the minimum 10% predicted energy requirements should be uplifted.</p>
Policy WW1 Development Relying on Non-Mains Sewerage	315	Support	<p>The Housing Executive supports this policy, which seeks to ensure that proposals for new development relying on non-mains wastewater infrastructure, either individually or cumulatively do not increase the risk of pollution, which is in the interests of sustainable development.</p> <p>We welcome that the issue of capacity of existing Wastewater Treatment Works across the Council area has been acknowledged as an issue and one which requires a collaborative approach between NI Water, the Council, developers and infrastructure providers, including the Housing Executive.</p>

Policy	Page / Paragraph	Support / Objection	Comments
Policy FRD1 – FRD6 Flood Risk and Drainage	316 -325	Support	<p>Flooding causes a detrimental effect on people's health and wellbeing, on the local environment and the economy. Therefore, we welcome these Policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding.</p> <p>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 of 10 or more units in sites of 1 ha or more and in areas where there is evidence of surface water flooding and in other circumstances as specified in Policy FRD3.</p> <p>We support Policy FRD6 as the use of Sustainable Drainage Systems (SuDS), which are important ways to assist flood prevention. SuDS can be used effectively to manage surface water run-off by, for example, the use of green roofs/walls, tree pits and swales, which help integrate green and blue infrastructure into the public realm/buildings and enhance nature conservation and biodiversity. We would like Policy FRD6 amended in line with the RDS which states, "Developments in areas, even those outside flood risk areas should incorporate Sustainable Drainage Systems".</p>
Policy HE1 – HE15 Historic Environment	327 - 350	Support	<p>We support the Historic Environment policies which aim to protect our built environment and heritage. These will help promote and enhance a sense of place and belonging to an area, aid the wellbeing of residents, attract tourists, act as a stimulus for regeneration and provide leisure and educational value.</p> <p>We welcome Policy HE14 promote the reuse on non-listed vernacular and locally important buildings. 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>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>We believe that protecting and enhancing historical assets is an important element of a place-making approach. As these conserve the characteristics and distinctness of a place and can lead to attractive environments which are valued by local people and visitors.</p>
Policy NH1 – DAR1 Natural Heritage, Landscape Assets, Coast and Land Instability or Coastal Erosion	351 -367	Support	<p>The Housing Executive supports policies that protect wildlife habitats, biodiversity, the coast and natural 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>We welcome the commitment to the conservation, protection and where possible, enhancement of biodiversity. We would also like to see references to the use of The NI Biodiversity Checklist (mentioned under Policy OS1) to help applicants identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests. 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 and natural heritage interests.</p> <p>We support the inclusion of trees and woodland as natural heritage features worthy of protection in policy NH5, however, we would like to see more detail included on the protection and planting of trees. We note Ireland is the least wooded region in Europe, with 7% wood cover, compared to a European average of 44%. Of the trees in Northern Ireland, 80% are recent conifer plantations, as opposed to native species, which can better support wildlife and biodiversity. The provision of trees and green open space include can aid flood protection and water management, increase biodiversity, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.</p> <p>The Housing Executive believes it is important to protect and create woodland and to increase the number of trees within cities and towns. We would like policy to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.</p>

Policy	Page / Paragraph	Support / Objection	Comments
			<p>We welcome reference to biodiversity net gain in GP1 and believe further detail could be included within NHE 5.</p> <p>The Housing Executive supports Policy LA1-LA4 which will help protect areas of special landscape from inappropriate development.</p> <p>The Housing Executive also welcomes Policies that help protect the coast from unacceptable development but would allow development that provides public 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.</p> <p>The Housing Executive welcomes the policy DAR1 to ensure safe development that minimises the risk to health and safety.</p>
Monitoring and Review	372	Support	<p>The Housing Executive would welcome assisting the Council on the implementation and monitoring of the draft Plan Strategy Policies, especially in relation to HOU 5 “Affordable Housing”. We also welcome references to our Housing Needs Assessment and 15-year housing market assessment. We are also happy to meet with the Council and share any new data sources over the Plan period, such as our forthcoming research on the Housing Market and new House Condition Surveys.</p>

Housing Executive Response to Newry, Mourne and Down District Council's Local Development Plan, Draft Plan Strategy – Supplementary Planning Guidance - Affordable Housing

The Housing Executive welcomes the opportunity to respond to Supplementary Planning Guidance (SPG) which will provide additional advice in relation to policies contained in the draft Plan Strategy. We understand that SPG does not introduce new policy but gives guidance to all participants in the planning process. The Housing Executive has comments in relation to the guidance for Affordable Housing, Policy HOU 5 and for Policy COU 3 Affordable Housing in the Countryside.

Policy HOU 5 Affordable Housing

The SPG expands on products that fall under the definition of affordable housing, including social housing, intermediate housing for sale and intermediate housing for rent. We would like to see further guidance for the implementation of Policy HOU 5, on what should accompany an application, and a sequential test on how the policy can be met for example:

1. onsite provision.

Or if it is demonstrated onsite provision is not financially viable

2. a change in the timing or tenure of the affordable housing units (e.g. social to intermediate or vice versa)
3. Examine the potential for reducing the affordable housing percentage requirement
4. New build off site provision;
5. A commuted sum to be ring fenced for affordable housing.

Other information that could be contained in the SPG includes a copy of the affordable housing policy, the definition of affordable housing, the role of key stakeholders, early engagement and the importance of Pre Application discussions, tenure blind housing, phasing, viability and alternative options, housing mix, design standards, S76 planning agreements and model clauses and process guide and checklists.

The Housing Executive has prepared a position paper on the implementation of affordable housing policies within Local Developments which will shortly be shared with all Councils to support the implementation the policy.

Policy COU 3 Affordable Housing in the Countryside

The SPG also includes a definition of Community Led housing which is included as affordable housing under COU 3 Affordable Housing in the Countryside. This policy provides an exception to allow for a group of dwellings adjacent to or near a village or small settlement to provide affordable housing,

where the Housing Executive has identified a need and where affordable housing development cannot be readily met within an existing settlement.

Community Led housing can provide housing for local people, especially in areas where there is pressure from second homes, as experienced in areas of Newry, Mourne and Down Council. However, Community Led housing may not always be affordable housing and to be considered affordable housing it should fall under the Plan Strategy definition which is the same as the DFC definition and that contained in the Strategic Planning Policy Statement. The Housing Executive does not have a formal role in community led housing and our support would be in relation to identifying the need for social and intermediate housing products.

Affordable housing must be delivered in partnership with either the Housing Executive or a registered housing provider.

We would like to see more detail on what constitutes community led housing and how it can be ensured that it is community led and is not led by developer who intends to sell houses on the open market. We would also like to gain further understanding of “local people” and how this can be assessed. Homes provided this way should be equality assessed to avoid discrimination against minority populations and contribute to balanced communities.