
Development Plan Team,
Planning Department,
Fermanagh and Omagh District Council
Strule House,
16 High Street,
Omagh,
BT78 1BQ

20th December 2018

Dear Sir/Madam

The Housing Executive welcomes the publication of Fermanagh and Omagh 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 Fermanagh and Omagh, to 2030. We believe this policy document will be central to promoting sustainable development, sustainable communities and place making.

As the Council has engaged and consulted with the Housing Executive on affordable housing in the LDP, we are largely content with the housing policy aims, and the majority of housing policies within the dPS. We especially welcome the dPS aims:

- provide for 5,190 new homes by 2030 across a range of housing types and tenures capable of meeting the needs of all sections of the community at locations accessible to existing and new community (including education) services, employment, leisure and recreational facilities; and
- provide for environments that are safe, healthy and connected, and which enhance opportunities for shared space for all.

We strongly support Policy HOU 3, which requires a 10% proportion of affordable housing, in developments of 10 units or more, or 0.5 hectares or more. The implementation of this Policy can help achieve the Regional Development Strategy's (RDS) objectives to meet the housing needs of the whole community, including affordable and special needs housing and to encourage mixed housing development as a way to strengthen community cohesion.

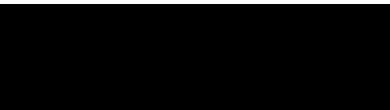
We strongly support the aims of the housing policies. However, we have some considerations on how the policy and aims can be best implemented. Therefore, we have included three objections in our response, in relation to the Policy SP04, Strategic Allocation and Management of Housing Supply, the lack of a specific accessible housing policy to meet the needs of those with mobility problems, and the six-unit restriction in the rural exceptions Policy HOU 17, Development in the Countryside.

As we are in support of the policy aims and our objectives relate solely to the implementation of these aims, we do not suggest any changes to the Sustainability Appraisal. While we have included a small number of objections, we would welcome discussing these with the Council to explain our concerns and potentially agree a joint position before an Independent Examination. In addition, we would like an opportunity to assist the Council and provide information on how Policy HOU 3 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.

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

I trust this information is of assistance,

Yours faithfully,

A solid black rectangular box used to redact the signature of Clark Bailie.

Clark Bailie
Chief Executive

Appendix 2

Housing Executive Response to the Fermanagh and Omagh Local Development Plan Draft Plan Strategy

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

Previous Development Plans applied prematurity post publication of draft Plans. While we understand, there is no presumption that an LDP is sound (Development Plan Practice Note 6), the option to apply prematurity is still included within the SPPS. The SPPS states that where any LDP is under preparation or review, it may be justifiable to refuse planning permission on grounds of prematurity, where development proposals would, individually or cumulatively, prejudice the outcome of the plan process. In addition, the SPPS does not include a statement that the weight attached depends on the stage of plan preparation, increasing as successive stages are reached.

We believe that the dPS should be a material consideration in the determination of planning applications in Fermanagh and Omagh as the extant plans in are now out of date. These extant Plans include the Fermanagh Area Plan 2007 and Omagh Area Plan 1987 – 2002. These Plans were prepared before the publication of the RDS and the enactment of the Planning Act (Northern Ireland) 2011. Therefore, unlike the dPS, these Plans did not need to adhere to the Planning Act, which provides a statutory duty to exercise functions with an objective of furthering sustainable development (Section 5) or take account of the RDS, and its aim to 'promote development which improves the health and wellbeing of citizens'. This aim directly relates to housing.

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
Introduction			
Legal Status and Policy Context	N/A	Representation	We would like to see further information included in this section on how prematurity would be applied.
Vision and Strategic Objectives			
Vision	5.3 & 5.5	Support	<p>The Housing Executive supports the Vision “... of a welcoming, shared and inclusive Fermanagh and Omagh district, where people and places are healthy, safe, connected and prosperous, and where our outstanding natural, built and cultural heritage is cherished and sustainably managed.”</p> <p>We also support the references to sustainable development and we believe that sustainable communities are a component to help achieve a sustainable Fermanagh and Omagh District. The Housing Executive believes that all new housing developments should support the creation of sustainable and balanced communities. A sustainable community is one where people want to live and work, both now and in the future. Below, we identify key components of a sustainable community, based on the Bristol Accord, which states that sustainable communities are:</p> <ul style="list-style-type: none"> • Inclusive and safe; • Well connected; • Well serviced; • Environmentally sensitive; • Economically successful; • Well designed and built; • Fair for everyone; and • Well run.
Strategic objectives	5.13	Support	The Housing Executive supports the Strategic Objectives under this section and the linkages to the Community Plan.

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p><u>Social objectives</u></p> <p>The Housing Executive supports the six social objectives, in particular we strongly support:</p> <ul style="list-style-type: none"> • <i>‘Provide for 5,190 new homes by 2030 across a range of housing types and tenures capable of meeting the needs of all sections of the community at locations accessible to existing and new community.’</i> • <i>‘Facilitate the development of new social, community and recreational services at locations accessible to existing communities and new housing developments, through a variety of mode of transportation.’</i> <p><u>Economic Objectives</u></p> <p>We support the aim and objectives to support the economy in Fermanagh and Omagh. We strongly welcome objective 7:</p> <ul style="list-style-type: none"> • <i>‘Promote sustainable economic development and growth by facilitating the creation of 4,875 new jobs by 2030 and providing a sufficient supply of economic development land through a range and choices of sites, taking into account accessibility by public transport and active travel modes.’</i> <p>We would note that the wording of objective 10 appears to be incomplete.</p> <p><u>Environment Objectives</u></p> <p>We support the environmental objectives, including:</p> <ul style="list-style-type: none"> • <i>‘Follow the principles of sustainability and high quality design standards in all developments to assist with meeting Climate Change targets and placemaking.’</i>
SPO1 – Furthering Sustainable Development	5.14 – 5.17	Support	The Housing Executive supports this policy on sustainable development. We believe the three pillars of sustainable development, the economy, social considerations and the environment are interlinked and support each other, and therefore, we support a balanced approach between the three elements, within the LDP.

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
Spatial Growth Strategy			
Spatial Growth Strategy	6.19 – 6.20	Support	The Housing Executive agrees that the Spatial Growth Strategy should focus major population and economic growth in the two main hubs with balanced growth across the small towns, villages and small settlements. The Housing Executive believes that focusing development of housing and economic opportunities within the hubs is in line with the RDS and we consider that development within settlement limits in towns, villages and small settlements will help regenerate and sustain urban and rural communities.
SP02 - Settlement	6.1 – 6.20	Support	We support the settlement hierarchy classification. This will allow opportunities for development of an appropriate scale, in these areas.
Strategic Allocation and Management of Housing Supply	Figure 5	Objection	<p>The Housing Executive does not agree with the proposed percentage split amongst the main towns, small towns, villages, and small settlements and the countryside as it is currently proposed. At present, it is proposed to allocate 13% more houses to the open countryside as to the local towns. We do not consider this as sustainable development.</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy. The RDS promotes sustainable development. It includes strategic aims to improve connectivity, promote health and well-being, protect and enhance the environment, to reduce our carbon footprint and to facilitate adaptation to climate change. • C3 Did the Council take account of policy and guidance issued by the Department The Planning Act (Northern Ireland) 2011, the SPPS, and the Sustainable Development Strategy all include a key aim to further sustainable development. <p><u>Justification</u></p> <p>The Housing Executive strongly supports the aim of sustaining rural communities but believes that a</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p data-bbox="835 336 2040 437">much higher proportion should be allocated to the main towns, local towns, villages and small settlements rather than the open countryside. The proposed housing allocation split could be considered to conflict with the LDPs Strategic Objectives 1, 2, 3, 4, 5, 6, 10 and 14.</p> <p data-bbox="835 480 2040 651">The Housing Executive believes that the LDP should aim to curtail the growth of single dwellings in the countryside. Large numbers of dispersed rural dwellings erode the character of the countryside, can contribute to social isolation, particularly for an ageing population, can add to pollution due to reliance on the private car and increase the potential for negative environmental impacts due to increased numbers of septic tanks.</p> <p data-bbox="835 694 2040 1011">Paragraph 2.2.6 highlights the majority of residents in F&ODC are reliant on car use for commuting and accessing services. However, reduced reliance on private cars can contribute to the reduction of greenhouse gases and promote active lifestyles, key aims in the SPPS. Therefore, we would like to see future housing developments concentrated in locations with good access to public transport, walking and cycling facilities. In addition, public transport is often the only available source of transport for the elderly, children and those living in affordable housing. 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. Therefore residential development should primarily occur within settlement development limits.</p> <p data-bbox="835 1054 2040 1193">Small towns, villages and small settlements offer access to services and resources for local residents, including access to public transport. This promotes connectivity and more sustainable patterns of travel. It enhances the vibrancy of these settlements, and helps to sustain commercial and community amenities and facilities.</p> <p data-bbox="835 1236 2040 1369">The Housing Executive considers that a housing allocation split with greater emphasis on small towns, villages and small settlements would be better aligned with the RDS, particularly the Housing Evaluation Framework, the SPPS and the Sustainable Development Strategy. It is also more compatible with the F&ODC vision, which calls for the development of a vibrant living place in a</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
SP03 – Strategic Allocation and Management of Housing Supply	6.21- 6.25		<p>connected and sustainable environment.</p> <p>The Housing Executive would like clarification on the term committed and uncommitted housing sites. We believe that committed sites are those which are under construction, sites with live planning permission and sites with a pending application i.e. defined as ‘hard commitments’ within the Housing topic paper. We believe that those sites termed ‘soft commitments’ which are zoned for housing but do not have planning permission, or sites where planning permission has expired could also be termed as uncommitted sites.</p> <p>In our decision to object to Policy SP 03, we are considering that the text indicates that committed housing sites are those sites under construction, with live planning permission or with pending applications. If a large majority of sites are included within Phase 1 are ‘hard commitments’ we consider this unsound, as it cannot readily meet affordable housing need.</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> <p>C1 Did the Council take account of the Regional Development Strategy.</p> <p>The RDS under RG8 states that the varied housing needs of the whole community need to be met and this includes the availability of affordable and special needs housing. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone.</p> <p>C3 Did the Council take account of policy and guidance issued by the Department</p> <p>The SPPS states that sites should be zoned in larger settlements for housing and Housing Policy Areas in smaller settlements should meet the full range of identified need. It also states that sites or areas within settlements where a site or part of a site is required to meet one or more category of need.</p> <p><u>Justification</u></p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>The Housing Executive has concerns with the phased approach to Managing Housing Supply, as we believe this will limit opportunities to develop affordable housing. The Policy text indicates that Phase 1 land is committed and, as we do not believe that an affordable housing requirement as set out in HOU3 can be applied retrospectively, the delivery of affordable housing will be constrained. This means that affordable housing need cannot be addressed within the Plan period unless Phase 2 land is released, which may be after the Plan end date.</p> <p>We would like to see the LPP include uncommitted sites, which are classified as Phase 1 and that these sites have the ability to accommodate affordable housing to help address affordable housing needs.</p> <p>We would also like to see affordable housing need, as one of the criteria to allow for the release of Phase 2 land, prior to the Plan end date.</p> <p>However, we would welcome discussion with the Council prior to IE to examine the potential for 'soft' committed sites, on sites zoned without planning permission and sites where planning permission has expired, to accommodate affordable housing.</p>
SP04 – Strategic Allocation of Land for Industry and Business	6.26 – 6.28	Support	We believe that the designation of a plentiful supply of industry and business land can support business development and job growth, leading to sustainable communities.
Development and Design			
DE01 – General Amenity Requirements	2.4 – 2.5	Support	We support the policy. It will help ensure the protection of the amenity of existing residential areas and the wellbeing of residents.
DE02 – Design Quality	2.6 – 2.13	Support	The Housing Executive supports this policy, which supports a place making approach. We believe that this will help protect local character, distinctiveness and the natural environment, which will

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>provide a sense of place, attract investment and improve well-being. We particularly support that development proposals should be:</p> <p><i>'d) accessible to all and incorporate design measures to provide adaptable accommodation and reduce social exclusion, the risk of crime and the fear of crime; and</i></p> <p><i>h) are energy and resource efficient and minimise their impact on the environment.'</i></p>
DE03 – Sustaining Rural Communities	2.14 – 2.15	Support	The Housing Executive supports policies, which allow development at an appropriate scale and can help promote sustainable rural communities.
DE04 – Integration and Design of Development in the Countryside, DE05 – Rural Character & DE06 – The Setting of Settlements	2.16 – 2.25	Support	The Housing Executive support policies which will protect rural character and landscapes.
People and Places			
HOU01 – Housing in Settlements	3.6 – 3.9	Support	<p>The Housing Executive supports a policy, which prioritises new housing development on zoned brownfield land. Prioritising development on brownfield land will help achieve the RDS 60% target.</p> <p>While the Housing Executive generally supports locating affordable housing within urban footprints due to the likely proximity of facilities and services, we welcome the exception, which can permit affordable housing on un-zoned greenfield lands when the unmet need cannot be met through existing commitments. In addition, we would like to see affordable housing developed on zoned sites or within housing policy areas, to allow planned development. Therefore, we would like to see the LPP allocate some uncommitted housing land, which could accommodate affordable housing, in areas of identified need. This would provide additional certainty to affordable housing providers.</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
HOU02 – Protection of Land Zoned for Housing	3.10 – 3.11	Support	We support the protection of land zoned for housing. We also support an exception for community infrastructure which can help support sustainable communities.
HOU03 – Affordable Housing in Settlements	3.12 – 3.14	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 10 or more dwelling units and the minimum 10% requirement for affordable housing to address affordable housing need. As there is a high level of committed housing sites, we believe that the ten unit threshold is appropriate to maximise the number of sites to which the policy can be applied. This development management policy approach will ensure mixed tenure development and sustainable communities. In addition, this will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area based deprivation.</p> <p>We welcome that the policy states that development should be tenure blind and integrated with market housing. This will ensure that there is a genuine housing mix, promoting cohesive communities.</p> <p>We would suggest that affordable housing provision should be secured by section 76 planning agreements.</p> <p>We request reference be made that in some instances there may be the potential for a higher proportion of affordable housing and that the proportion of affordable housing can be adjusted through a key site requirement within the local policies plan, especially in areas where there is an acute housing need.</p> <p>We would like to see a statement in the policy box that the Housing Executive will determine the mix (social/intermediate and size) of affordable housing required. In addition, we would like to see a reference that the social housing units will be delivered to standards contained in DFC’s Housing</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>Association Guide.</p> <p>We support the definition of affordable housing as defined by the SPPS. We understand the number of intermediate products may be expanded in the future. We would like any change to the definition to include the following criteria:</p> <ul style="list-style-type: none"> • the affordable housing is delivered by a registered housing association; • the affordable housing is allocated by a housing association to eligible households who cannot access market housing; and • the affordable housing units should remain at an affordable price for future eligible households or if these restrictions are lifted, the subsidy shall be recycled for alternative affordable housing provision. <p>We request it to be stated that the Housing Executive has a role in the identification of need.</p> <p>We note that Policy Clarification in, paragraph 3.14, states that the social rented housing, and its retention in perpetuity will be secured by planning conditions or by legal agreement. However, currently legislation requires Housing Associations and the Housing Executive to operate a House Sale Scheme. The House Sales Scheme is being reviewed, but any change to legislation will likely require Executive and Ministerial approval. As, at this time, the retention of affordable housing in perpetuity cannot be implemented, we would like to see this statement removed.</p> <p>We believe that the implementation of the policy should be clarified by the supplementary planning guidance and the Housing Executive is willing to contribute to the development of this.</p> <p>We would like the plan to contain a statement that a developer contribution may be required in the future, resulting from a plan review.</p> <p>We would like to see prematurity applied. If it is not applied, there may be an increase in planning applications in order to avoid policy provisions, which may be in place post-plan adoption, prejudicing</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			the ability of the plan to achieve the strategic objectives and aims, for example to address current and future residential needs.
HOU04 – Traveller Accommodation	3.15	Support	We support the proposed policy to ensure that the needs of travellers are accommodated in the LDP.
HOU05 – Shaping Our Houses and Homes	3.16 – 3.21	Objection	<p>We believe that high quality residential development will be an important element in attracting people to live in F&ODC, and can help achieve the aim to grow the population of the council area. It is crucial that housing is future proofed, such as being designed to Lifetime Home Standards and containing energy efficient design. Therefore, while we welcome the criteria within contained within the policy, we would like to see the policy contain additional criteria to require all new homes to be designed to lifetime home standards and that housing developments contain a 10% proportion of wheelchair standard units, in order to meet the needs of all.</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> • C1 Did the Council take account of the Regional Development Strategy The RDS under RG8 states that the varied housing needs of the whole community need to be met. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone. • C2 Did the Council take account of its Community Plan Accessible housing policies would help meet the community plan outcomes ‘Our people are healthy and well-physically, mentally and emotionally’, ‘older people lead more independent engaged and socially connected lives’ and ‘Our communities are inclusive, safe, resilient and empowered’. • C3 Did the Council take account of policy and guidance issued by the Department The SPPS states that sites should be zoned in larger settlements for housing and Housing Policy Areas in smaller settlements should meet the full range of identified need. It also states that sites or areas within settlements where a site or part of a site is required to meet one or more

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>category of need.</p> <ul style="list-style-type: none"> C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining councils' district The draft Programme for Government's Delivery Plan, indicators state that there is an under-supply of appropriate housing for older people. To address this, it states actions should be established, to improve independent living and the provision of suitable homes, including more accessible homes for wheelchair users within the private rented and owner occupied sectors. <p><u>Justification</u></p> <p>Currently, demand from people with a disability who wish to own their own homes cannot readily be met, as there is no requirement for market housing to provide lifetime homes or wheelchair accessible homes. Accessible housing will allow older and disabled people to feel safe and secure, and to be fully integrated within the community. This is especially important in an aging society.</p> <p>We believe accessible housing policies can help achieve regional policy objectives. One of the eight aims of the RDS is to 'Promote development which improves the health and well-being of communities'. Regional guidance also aims to strengthen community cohesion by encouraging mixed housing development to allow heterogeneous populations to live together, reducing social isolation and creating a sense of belonging to everyone.</p> <p>The SPSS identifies an important factor of sustainable development, in relation to the needs and aspirations of our society, is to facilitate sustainable housing growth in response to changing housing need and to progress policies, plans and proposals that can improve the health and wellbeing of local communities, helping to build a strong and shared society.</p> <p>The SPSS contains five core planning principles, one of which is Improving Health and Wellbeing, which states that when plan making and decision-taking, planning authorities should contribute positively to health and wellbeing. This includes providing for safe and secure age-friendly</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>environments, and by supporting the delivery of homes to meet the full range of housing needs. This core principle also acknowledges that how a building is designed can have a positive impact on how people feel. The core principle to Create and Enhance Shared space recognises that offering a variety of house types, sizes and tenures will help meet the diverse needs of the community and provide opportunities for shared and balanced communities. An additional core principle Supporting Good Design and Wellbeing states that ‘good design can change lives... for the better’; and can promote healthier living, accessibility and inclusivity.</p> <p>An increased provision of lifetime homes and wheelchair units can contribute to achieving outcomes of the draft Programme for Government’s Delivery Plan, (October 2016). These include:</p> <ul style="list-style-type: none"> • We live long and healthy lives; • We care for others and help those in need; • We are a shared society which respects diversity; and • We connect people and opportunities through our infrastructure. <p>Indicators are set out under each outcome. Three related indicators are:</p> <ul style="list-style-type: none"> • Improving the quality of life for people with disabilities and their families; • The number of households in housing stress; and • The gap between the number of houses we need and the number of houses we have. <p>Further information on Lifetime Homes and Wheelchair housing is set out in Appendix 1.</p>
HOU06 – Public Open Space in New Residential Developments	3.22 – 3.26	Support	<p>We strongly support the provision of open space, especially green open space, which evidence shows brings significant benefits for people’s health and wellbeing, helps to create a quality living environment, and promotes community cohesion.</p> <p>We suggest that off-site open space contributions should be permitted only in exceptional circumstances, where it is in close proximity and easily accessible to the proposed development.</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>The use of section 76 planning agreements could be used to ensure that open space is provided and maintained in new developments.</p> <p>We also support the use of landscape strategies within residential developments to ensure that open space is adequate, well designed and is well integrated as part of the development. It should be of high quality and readily accessible to all residents, including children. New large-scale residential development should provide equipped play areas and multi-use game areas. We believe this will increase access to open space and will encourage active life styles, promoting health and wellbeing.</p>
HOU07 – Conversion and Change of Use of Existing Building to Self- Contained Flats	3.27 – 3.28	Support	We acknowledge that this policy will facilitate living over the shops (LOTS), which we support. LOTS can contribute to an increased supply of housing units, provide additional customers for businesses, including at night time, leading to increased vitality in the area.
HOU08 – Annex Living	3.29	Support	
HOU09 – HOU 16 - Rural Housing Policies	3.30 - 3.60		See housing comments provided regarding draft policy DE03 – Sustaining Rural Communities.
HOU17 – Affordable Housing In Countryside	3.61 – 3.62	Objection	<p>While we welcome the inclusion of a rural affordable housing exceptions policy, we would like to see the restriction to no more than six units removed. We support increasing the number in a group for more than 6 units, should need be higher, and due to economies of scale.</p> <p><u>Soundness Tests</u></p> <ul style="list-style-type: none"> C1 Did the Council take account of the Regional Development Strategy. The RDS under RG8 stats that the varied housing needs of the whole community need to be met and this includes the availability of affordable and special needs housing. It also states development plans should ensure an adequate and available supply of quality housing to meet the needs of everyone.

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<ul style="list-style-type: none"> • C3 Did the Council take account of policy and guidance issued by the Department The SPPS section on development in the countryside states that strategic policy is to be taken into account in the preparation of an LDP. The SPPS policy supports a group of affordable housing adjacent or near a small settlement and that, the appropriate number of affordable dwellings permissible will depend upon the identified need. • CE2: the strategy, policies and allocations are realistic, appropriate having considered the relevant alternatives and are founded on a robust evidence base It is unlikely that 6 dwellings will be economically viable for a Housing Association to develop. • CE4: It is reasonable flexible to enable it to deal with changing circumstances While we do not envisage high levels of affordable housing need within the Council area, we would like the flexibility to meet affordable housing need, should need rise over the plan period. <p><u>Justification</u> Six units or less is unlikely to be economically viable for a Housing Association to develop. The PPS 21 exception of 14 units was set in order to allow development to be financially viable, especially if utilities need to be provided.</p> <p>We have concerns that the first bullet point (page 81) states that an application can be made by a rural development/community development association to develop affordable housing under the policy. Currently affordable housing can only be delivered by, or draw Housing Association grant funding, if it is a Registered Housing Association with DFC. Registered Housing Associations allocate houses to eligible households who are in the greatest housing need. While the intention of this policy may be to allow a Community Land Trust to provide affordable housing, we have previously received legal advice stating that the use of such a concept in Northern Ireland would require either specific enabling legislation, or modification of existing land law (the Property Order 1997 & Leasehold (Enlargements and Extensions) Act 1971).</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>We would like the 2nd bullet point (page 81) to state <i>'where a demonstrable need has been identified by the Housing Executive...'</i>.</p> <p>It should also be noted, that to meet affordable housing need in rural areas, the Housing Executive prefers planned development and allocation policies, to the use of an exception policy. In addition, as there has been no development under PPS 21 CTY 5 in Fermanagh and Omagh to date, we do not envisage any large numbers of rural exception sites coming forward. However, we would still want to retain flexibility if there are changing circumstances. Should need rise, an exception policy that is viable and can be delivered by a housing association, would negate a potential need for a plan amendment and the associated Examination, delaying meeting need.</p> <p>We would like to see the retention of the joint DOE/NIHE CTY 5 Protocol, produced in 2010, to assist housing associations, the Housing Executive and planners in the implementation of rural exceptions policy for affordable housing.</p> <p>Our comment relating to retaining social housing in perpetuity can be found in response to HOU03, above.</p>
HOU18 – Residential Caravans and Mobile Homes	3.63	Support	
CF01 – Community Facilities	3.64 – 3.66	Support	<p>We support this policy. The Housing Executive believes community infrastructure is an important element of sustainable and high quality development, providing access for residents to important services and facilities. For new residential developments, the time lag between people moving into a development and the provision of community facilities should be minimised. Where possible, infrastructure, communal facilities and external spaces should be provided at the same time as the housing.</p> <p>In addition, we support a developer contribution policy, where the uplift in land values generated by the granting of planning permission should help fund additional community infrastructure that is</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			needed to contribute to the development of sustainable communities and their well-being.
OSR01 – Protection of Open Space		Support	<p>The Housing Executive strongly supports open space, especially green open space, which evidence shows brings significant benefits for people’s health and wellbeing, helps to create a quality living environment, and promotes community cohesion. Therefore, we support the open space policies, for the provision and protection of open space.</p> <p>We strongly support the protection of existing open space; however, we also believe that there are circumstances where the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. Therefore the Housing Executive welcomes the exception contained within the draft policy that in exceptional circumstances, the redevelopment of open space will be considered where it brings substantial community benefits. We would like affordable housing to be recognised as a substantial community benefit.</p> <p>The Housing Executive, in conjunction with the DOE, produced a Joint Protocol for the operation of the exception policy in PPS 8. We would like to see the retention of this Protocol to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p>
OSR02 – OS07 - Open Space policies	3.75-3.85	Support	The Housing Executive supports open space and sport and recreation policies, which can facilitate healthy lifestyles.
RCA01 – Rural Community Areas	3.86 – 3.90	Support	The Housing Executive welcomes the identification of Rural Community Areas, as a means of sustaining rural communities. However, we believe that an additional criterion could be included that explicitly states that development will be permitted only where it complies with policies DE04 and DE05 to ensure that rural character is protected.
Economy			
IB01 – Industry and	4.7 – 4.9	Support	We support locations within the urban footprint, close to centres, or near major corridors, which are

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
Business Developments in Settlements			accessible by means other than the private car. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft Programme of Government delivery plans.
IB02 – Loss of Industry and Business Uses & IB03 – Development incompatible with Industrial and Business Uses	4.10 – 4.14	Support	The Housing Executive supports the protection of existing employment uses to support economic regeneration and employment growth, a key aim of the RDS.
IB04 – Industry and Business Development in the Countryside	4.15 – 4.19	Support	<p>The Housing Executive generally supports the policy for industry and business development in the countryside. However, it must be ensured that the countryside is afforded a high level of protection from excessive and inappropriate development.</p> <p>Outside of settlements economic development sites, especially major industrial proposals should promote that the location of employment land outside of settlements should be located near major economic corridors, to support accessibility for all residents in the district.</p>
IB05 – Farm Diversification	4.20 – 4.23	Support	The Housing Executive support appropriate farm diversification projects within the countryside, as long as they are appropriate in scale, and sensitive to the environment, amenity and rural landscapes.
TCR01 – Town Centres	4.35 – 4.37	Support	<p>The Housing Executive supports a town centre first and sequential approach to retailing.</p> <p>A strong town centre aids the development of sustainable communities. We believe that the designation of a town centre and a primary retail core can ensure that a range services, facilities and employment opportunities are located in highly accessible areas, providing a sense of place. We strongly advocate for a town centre first approach. We believe that town centres are the most sustainable location for commercial functions and services, as they are highly accessible by all forms</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>of transport.</p> <p>The Plan should consider the long-term future of town centres in the context of changed shopping patterns, the increase in vacant units and consequent need to diversify uses.</p> <p>We would like to see the LDP promote a mix of uses in the centre. We believe that mixed use sites, including ‘pop up’ uses in vacant units and active frontages, will not only increase activity levels and footfall in an area but can also strengthen the resilience of a place against economic changes. We also believe that town centre living can be encouraged, where opportunities for affordable accommodation could be identified. We believe this would be especially suitable for single households, which make up roughly half of the social housing waiting list. Town centre living initiatives, for example Living over the Shops, should be promoted in the Plan as an acceptable alternative use. Town centre living has many benefits, including increasing the supply of small housing units, increasing vibrancy and a night time economy, revitalizing town centres, improving security for people and businesses, reducing isolation, reducing the need to travel and reducing the need for greenfield development.</p> <p>However, facilities should be provided in order to support high living standards within the town centres including open space, health, and education and community services. We also believe that environmental improvements and, high quality urban design that is pedestrian friendly, will encourage visitors to town centres.</p> <p>The Housing Executive would like to see the LDP promote, town centre development opportunity sites, which can support the reuse of brownfield sites and a mixed-use approach. We believe a mix of uses for each opportunity site should be clearly identified in KSRs within the LPP. Design briefs and masterplans could also be developed for these sites.</p>
TCR02 – Primary Retail Frontage	4.38	Support	The Housing Executive supports active retail frontages, enhancing the vibrancy of towns. Therefore, we also support temporary uses for vacant spaces. Active frontages, along with environmental

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			improvements and public urban design can increase the attractiveness of town centres, making them destinations.
TCR03 – Local Neighbourhood Centres TCR04 – Villages and Small Settlements	4.39	Support	We support these policies, as they will contribute to meeting the daily needs of local communities. This is important for those without access to a private car.
TOU01 – TOU04	4.49 – 4.71	Support	We believe tourist development, such as hotel accommodation, should be primarily located in towns, to enhance regeneration and vibrancy of their centres. It will also protect tourism assets from over development.
Environment			
HE01 – HE09	5.1 – 5.34	Support	We support the built heritage policies as they will protect and enhance a sense of place. We believe that underused and vacant unlisted locally important building or vernacular buildings have the potential to become catalysts for regeneration, through adaptive reuse. This sustainable approach preserves important elements of identity and local distinctiveness.
NE01 – NE03 & L01 – L03	5.35 – 5.56	Support	We support the protection of natural heritage resources to protect our environment, biodiversity and wildlife. F&ODC has a number of special landscapes, which provide a sense of place and provide an attractive environment for residents and visitors. We believe it is important these landscapes are protected from inappropriate development. Therefore, we welcome environmental and landscape designations such as the Sperrin Area of Outstanding Natural Beauty, Areas of High Scenic Value and new Special Countryside Areas.
Infrastructure			
FLD01 – FLD06	6.1 – 6.22	Support	Flooding causes a detrimental effect on people’s health and wellbeing, on the local environment and

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
			<p>the economy. We welcome this policy, which deals with development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. We also support that the precautionary approach taken in PPS 15 is included within the dPS. We encourage the use of Sustainable Urban Drainage Systems and believe that it is important that drainage assessments be provided for all new residential developments within potential flood risk areas.</p>
RE01 – Renewable and Low Carbon Energy Generation	6.23 – 6.33	Support	<p>The Housing Executive supports Policy RE01.</p> <p>The Housing Executive, as the Home Energy Conservation Authority maximising the opportunities to develop local renewable energy schemes, and that new developments are resource and energy efficient. We believe that energy efficiency measures and renewable energy schemes, in residential areas can reduce fuel poverty for local people, thereby increasing health and wellbeing.</p>
TR01– TR06	6.38 – 6.54	Support	<p>We support the integration of transport and patterns of development, which reduce the need to travel, to promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times. We note that reducing travel demand through integration of land-use planning and transport is a key objective of the draft PfG delivery plans.</p> <p>The Housing Executive agrees with the policy approach to protect disused transport routes including a network of green and blue infrastructure. Policies, which support active travel, can improve health and wellbeing. Community greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles. We would like to see the Council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated.</p> <p>Due to different car ownership levels for social housing, than other tenures of development, (56% of social housing tenants do not have access to a car, compared to the Northern Ireland average of 20%) we would like some flexibility in the implementation of parking standards in social housing schemes.</p>

Contents / Policy	Paragraph Reference	Support / Objection / Representation	Comments
Monitoring and Review			
Support	Section 7		We welcome the draft Plan including detailed information on Monitoring and Review arrangements. In particular, we welcome the inclusion of affordable housing completions and the Housing Executive’s Housing Need Assessments as indicators. This will demonstrate how well new policies are addressing housing need, and if any Plan interventions are necessary.

Wheelchair Units & Lifetime Homes

The quality of our homes has a significant influence on our health, happiness, confidence, social life, relationships with our families and general well-being. For those with mobility problems, who may be more likely to spend a larger proportion of their time at home, it is essential that their home enable them to live as safely, healthily and as independently as possible.

Adequate housing is a human right, essential to human dignity, security and wellbeing. The UN's Committee on Economic, Social and Cultural Rights, states that for housing to be adequate, a number of criteria need to be met, including 'Accessibility'. Housing is considered inadequate if the specific needs of disadvantaged and marginalized groups are not taken into account.

Within this document, the term accessible housing is defined as housing that is designed to Lifetime Home standards or wheelchair standards as set out in Department of Communities' Housing Association Guide, found at the following link: <https://www.communities-ni.gov.uk/collections/housing-association-guide>. Standards for Lifetime Homes and wheelchair housing are already in place in Northern Ireland for social housing developments. We believe these standards can be used in the development of accessible housing in the private sector.

Lifetime Homes

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, these include:

- Ample parking space close to home with level access;
- Wider doorways;
- Ground floor living room adaptable as an additional bedroom;
- Accessible WC on ground floor with shower room potential;

- Space and design for stair and floor lifts, hoists and wheelchair adaptable if required;
- Easy open windows and easy bin access.

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.

The Housing Executive would, therefore, encourage Council planners to incorporate, within the Local Development Plan (LDP), a requirement that all new housing should meet Lifetime Home standards. We believe that all new housing should be suitable for everyone, from young families to older people, and individuals with a temporary or permanent physical impairment. For further information on Lifetime Principles, refer to Appendix 1.

Wheelchair Housing

Standard wheelchair housing is primarily designed to aid independent living for people with physical disabilities and those who need a wheelchair for day-to-day mobility and require the larger areas and circulation areas afforded by this accommodation type.

Housing Associations already cater for identified wheelchair need in their social housing planning applications. However, demand from people with a disability who wish to own their own homes, or rent privately, cannot readily be met, as there is no requirement for market housing to provide wheelchair accessible homes. Currently, approximately 35,000 people in Northern Ireland require a wheelchair on a daily basis, with 1,164 new wheelchair users registering last year (October 2016-Sept 2017, Musgrave Park Hospital). In addition, there are increasing numbers with complex disabilities living in domestic settings due to:

- The increased demographics of age and disability;
- Medical advancements with people surviving trauma; and
- Legislative & policy changes e.g. 'Care in the Community'.

Department for Communities' (DFC) Housing Association Guide states that in developing wheelchair standard housing, Housing Associations are encouraged to consider the following key design principles and aims:

- generally, design that supports independent living, improves quality of life and contributes to wellbeing;

- a universal approach to design, which seeks to achieve homes that are inclusive for a wide range of wheelchair users, and which takes account of a variety of other disabilities where possible. (e.g. dexterity, cognitive function, and hearing or sight impairments);
- flexible and adaptable design to help future-proof for changing needs of occupants (e.g. ageing or degenerative diseases);
- a default position of design for 'assisted' rather than 'independent' wheelchair users;
- the provision of optimum floor space that takes account of aspects such as carers, larger turning circles, equipment, storage and flexibility (e.g. a 'loose-fit, long life' approach); and
- consideration of a range of housing forms, including two storey wheelchair homes that can help dwellings integrate with the community and support higher densities, when required.

The basis of any design for wheelchair housing should normally be a universal solution that can be easily adapted to suit a wide range of users now and over the life of the property.

Wheelchair standard homes support independent living, promote an inclusive society and reduce the need for costly and disruptive adaptations. Therefore, the Housing Executive would like to see the LDP require a proportion of wheelchair units, to be provided on all housing developments, including market housing, over a certain threshold. While this could be marketed directly for wheelchair users, it could also be sold to non-wheelchair users. The purpose is to increase accessible housing stock, addressing an undersupply of appropriate housing for all, in the long term.

Policy Context

UN's Convention on the Rights of Persons with Disabilities (CRPD)

Article 19 of the CRPD 'Living independently and being included in the community' states Parties to the Convention (including the UK) 'recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including by ensuring that:

- a) Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement;
- b) Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;
- c) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.'

Section 75 and Disability Discrimination Act 1995

Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, to have due regard to the need to promote equality of opportunity between nine equality categories, including persons with a disability. In addition, the Disability Discrimination Act contains a general duty (Section 49 A) that every public authority in carrying out its functions has due regard to:

- a) the need to eliminate discrimination that is unlawful under this Act;
- b) the need to eliminate harassment of disabled persons that is related to their disabilities;
- c) the need to promote equality of opportunity between disabled persons and other persons;
- d) the need to take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons;
- e) the need to promote positive attitudes towards disabled persons; and
- f) the need to encourage participation by disabled persons in public life.

Draft Programme for Government

We believe that an increased provision of lifetime homes and wheelchair units could contribute to achieving outcomes of the draft Programme for Government's Delivery Plan, (October 2016). These include:

- We live long and healthy lives;
- We care for others and help those in need;
- We are a shared society which respects diversity; and
- We connect people and opportunities through our infrastructure.

Indicators are set out under each outcome. Three related indicators are:

- Improving the quality of life for people with disabilities and their families;
- The number of households in housing stress; and
- The gap between the number of houses we need and the number of houses we have.

These indicators show that there is an under-supply of appropriate housing for particular groups, including housing for older people. To address this, actions are established, for example, to improve independent living and the provision of suitable homes, and there should be more accessible homes for wheelchair users, within the private rented and owner occupied sectors. A role of planning is to support the Programme for Government.

A Strategy to Improve the Lives of People with Disabilities 2012 – 2015

A Strategy to Improve the Lives of People with Disabilities 2012 – 2015, was published by the Office of the First Minister and Deputy First Minister, in January 2013. The purpose of the Strategy is set out below:

- Set out a high level policy framework to give coherence and guidance to Northern Ireland Departments' activities across general and disability specific areas of policy;
- Drive improved performance of service delivery, leading to improved outcomes for persons with a disability;
- Increase the understanding and importance of the needs of persons with a disability and ensure these needs are recognised when policy is developed or when implementing initiatives which impact on disabled people; and
- Improve the opportunities for people with disabilities to contribute across all areas of society.

The strategy also contains a seven goals including:

- **Choice and Control**

This goal is to ensure that people with disabilities receive the appropriate support so that they can empower themselves to make choice and exercise control over their own lives.

- **Independent Living**

This goal is linked to Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). This Article relates to Independent Living and inclusive communities. Therefore, the aim of this goal is that every person with a disability is supported to empower themselves to become active, independent citizens with the freedom to make choices that affect their lives and avail of services that are individual-centred and accessible. The Strategy promotes a concept of Independent Living, which advocates greater choice and control for disabled people. It recognises that in order for people with disabilities to live independent lives practical support, systems and resources are required.

- **Bringing About Change**

The objective of this goal is to create a culture where positive attitudes are promoted towards people with a disability, one in which their needs are mainstreamed into all aspects of life and where all services are delivered on a rights basis and in an appropriate and supportive way.

Regional Development Strategy

One of the eight aims of the RDS is to 'Promote development which improves the health and well-being of communities'. Regional guidance also aims to strengthen community cohesion by encouraging mixed housing development to allow heterogeneous populations to live together, reducing social isolation and creating a sense of belonging to everyone. Policy RG8 'Manage housing growth to achieve sustainable patterns of residential development' states the varied housing needs of the whole community need to be met, including special needs housing.

Strategic Planning Policy Statement

The SPPS identifies an important factor of sustainable development, in relation to the needs and aspirations of our society, is to facilitate sustainable housing growth in response to changing housing need and to progress policies, plans and proposals that

can improve the health and wellbeing of local communities, helping to build a strong and shared society.

The SPPS contains five core planning principles, one of which is Improving Health and Wellbeing, which states that when plan making and decision-taking, planning authorities should contribute positively to health and wellbeing. This includes providing for safe and secure age-friendly environments, and by supporting the delivery of homes to meet the full range of housing needs. This core principle also acknowledges that how a building is designed can have a positive impact on how people feel. The core principle to Create and Enhance Shared space recognises that offering a variety of house types, sizes and tenures will help meet the diverse needs of the community and provide opportunities for shared and balanced communities. An additional core principle Supporting Good Design and Wellbeing states that ‘good design can change lives... for the better’; and can promote healthier living, accessibility and inclusivity.

[Housing in Settlements](#)

Under Housing in Settlements, the SPPS states that planning authorities must deliver an adequate and available supply of quality housing to meet the needs of everyone and facilitate balanced communities, which are accessible to all. LDPs should also zone and identify sites in settlements to meeting the full range and categories of identified need. The LDP can set design requirements that should be applied.

Community Plan 2030

The Fermanagh and Omagh 2030 Community Plan Council Community Plan includes a vision and three cross cutting themes, which can support improving opportunities and services for disadvantaged groups, including those with a disability.

- the vision: ‘welcoming , shared and inclusive Fermanagh and Omagh District, where people and places are healthy, safe, connected and prosperous’;
- Cross cutting themes are ‘People and Communities’, ‘Environment’ and ‘Economy Infrastructure and Skills’.

The Community Plan contains outcomes under each theme, which relate to aiding people with disabilities and planning for an aging population. The theme ‘People and Communities’ is supported by outcomes including that people are healthy and well-physically, mentally and emotionally, and that older people lead more independent, engaged and socially connected lives. In addition the community plan contains a priority for ‘Strong, Safe, Shared and Inclusive Communities.’ The theme ‘Environment’ is supported by an outcome that the district is an attractive and accessible place.

We believe the Community Plan provides a policy context for the development of housing, which is accessible to all within the Council area. Accessible housing will help provide cohesive, inclusive and balanced communities where older people and those with disabilities are welcome and supported to live safely and independently, thereby helping to achieve key outcomes of the Community Plan.

Local Development Plan

The Local Development Plan (LDP) must take account of the Community Plan and its outcomes. As the LDP contains the same vision as the Community Plan, we believe that including policies for Lifetime Homes and wheelchair standard housing within the LDP to help provide increased levels of appropriate and housing for older people and those with disabilities, supports both the Community Plan and LDPs vision for an of a welcoming, shared and inclusive Fermanagh and Omagh district, where people and places are healthy, safe, connected and prosperous. The LDP will provide a 15-year framework to support the growth and regeneration of the Fermanagh and Omagh area economically, environmentally and socially. The draft Plan Strategy (dPS) acknowledges that the population of the Council area is ageing. The provision of accessible housing can clearly contribute to the delivery of the strategic objectives contained in the dPS, including:

- Social Strategic Objective 4: *'provide for 5,190 new homes by 2030, across a range of housing types and tenures capable of meeting the needs of all sections of the community at locations accessible to existing and new community (including education) services, employment, leisure and recreational facilities'*; and
- Social Strategic Objective 6: *'provide for environments that are safe, healthy and connected and which enhance opportunities for shared space for all'*.

Draft policy DE02 – Design Quality states that the Council will support development proposals, which are accessible to all and incorporate design measures to provide adaptable accommodation and reduce social exclusion, the risk of crime, and the fear of crime. The inclusion of accessible housing policies would help meet the criteria in draft policy HOU5 – Shaping our Houses and Homes, including *'they provide a mix of housing to meet the needs of everyone, including a range of dwelling types, sizes and tenures'*.

Evidence

Need

NISRA's area statistics at 2018 for Fermanagh and Omagh state:

- 21.9% of the population were aged 60+ years and 2.1% were aged 85+ years; ; (2016);
- The population of Fermanagh and Omagh aged 65+ is expected to rise to 25,065 by 2039 (20.8%) and is expected to rise by 34.6%;
- 20.8% of people had a long-term health problem or disability that limited their day-to-day activities; (2011 Census);
- 11.3% of households were comprised of a single person aged 65+ years;
- 20.8% of those aged 65+ years were living with a long-term health condition, of which 37.1% had a mobility or dexterity difficulty and 20.6% said they had a chronic illness (2011 Census);
- Of those aged 65+ years living in households in Fermanagh and Omagh, 81% lived in households that were owner occupied, and 5% of households lived in the private rented sector (2011 Census);
- 9.8% lived in households that had been adapted or designed for wheelchair use
- 9.5% lived in households that had been adapted or designed for other physical or mobility issues.
- 520 males and 770 females aged 65+ years living in Fermanagh and Omagh claimed Carers Allowance in 2016.
- In 2011, 10.2% of those aged 65+ years in Fermanagh and Omagh provided unpaid care.

This evidence shows that there is a clear and growing need for accessible housing.

New Wheelchair Users

There are approximately 35,000 wheelchair users in Northern Ireland who require a wheelchair on a daily basis (October 2017), and there are also several thousand more that need a wheelchair on a temporary or occasional basis, some of whom will progress to need a wheelchair for daily use. The Regional Disablement Service (RDS) receives referrals for new wheelchair users each year and most of these service users will need an urgent response to emerging housing needs in the form of housing adaptations to their existing dwelling, often involving inter-floor lifts or extensions, or new build housing options.

The Housing Growth Indicators (HGI) for Fermanagh and Omagh state there is a housing need for 4,500 dwellings to 2025, this equates to 346 units a year. Based on this the dPS proposes a housing target of 5,190 units for the Plan period (2015-2030).

Musgrave Park Hospital statistics report there were 124 new users within 118 households in Fermanagh and Omagh during 2016/17. This equates to 34% of the HGI and the identified LDP housing growth. Of the 124 new wheelchair households, 101 households, or 82%, lived in the owner occupied and private rented sector. This means that the proportion of new wheelchair users in the private sector (outside of nursing homes), in relation to the HGI is 29%, and the identified housing growth in the LDP. 45% all wheelchair users lived in households of three or more people; consequently, 55% were lived in households of one or two people indicating different sizes and types of housing units are required. Only 14 new wheelchair user households of living in the private sector stated their home was wheelchair accessible.

Costs

There is a lack of up to date research on the costs of Lifetime Home and Wheelchair properties. While some of the reports mentioned below, have been prepared several years ago, they can provide an indication of costs. We believe that any additional costs in the construction of accessible housing, within the private sector, could be reflected in the house sale price.

Lifetime Homes

The Housing Standards Review (DCLG, 2014) estimated that the cost of building to lifetime homes standard for a 3-bedroom property was £521 more than current building standards. A study by the Housing Executive estimated the additional costs of building to the Lifetime Homes standard to be between £165 and a maximum of £545. An additional study commissioned by RICs in 2006 estimated additional costs are set out in Table 1.

Table 1:

Lifetime Homes Design Criterion	Costs per dwelling (£)
Communal stairways and lifts	Negligible
Doors and hallways	Negligible
Entrance level WC and shower drainage	120
Bathroom and WC walls	50
Entrance level bedspace	100
Stair lift / through-floor lift	60

Tracking hoist route	25
Increasing floor area of 2 bed. houses to 70m2	192
TOTAL	547

Source: Martin J, Martin A *'The Cost of the Lifetime Homes Initiative'* RICS Building Cost Information Service, 2006

However, Habinteg state the most significant factor when considering costs was whether the home had been designed to incorporate Lifetime Homes criteria from the outset, or whether a standard design had been modified. English Partnership (2006) 'Lessons Learnt' study states showed that additional costs can be avoided if they are designed-out early. In most instances, it is possible to incorporate the Lifetime Homes design criteria without adding to the footprint of a dwelling. It is also argued that the net cost of implementing Lifetime Homes will diminish as the concept is more widely adopted and as standards of design, and market expectations, rise.

Wheelchair costs

As there is a lack of information on private sector construction costs for market housing for non-wheelchair and wheelchair standard dwellings, we have used construction costs in the social sector to provide an indication of price differences. The percentage increase in construction costs between social housing units designed as general needs and wheelchair standards are set out in Table 2. However, it should be noted that while some of these increased costs include the installation of a lift, we do not anticipate that developers of these units, will be required to provide a lift, but designs should include space for a lift (Section 3.14 of DFC's Housing Association Design Guide Annex A, see Appendix 2).

Table 2:

House Type	Percentage increase in works
3 person / 2 bedroom house	53% with lift installed
5 person / 3 bedroom house	49% with lift installed 33% wheelchair lift is not installed
3 person / 2 bedroom bungalow	28%
5 person / 3 bedroom bungalow	28%
3 person / 2 bedroom apartment	28%

Source: NIHE, 2018

Benefits

Lifetime Homes have benefits, which have positive affects across departments and agencies. The Habinteg 'Towards Accessible Housing' toolkit highlights that the 'costs of inaccessible housing are wide-ranging and significant. They include:

- the costs of residential care that could otherwise be avoided;
- levels of social care that could be reduced or removed;
- impacts on independent living, employment and social life;
- falls and other accidents which can be life changing or fatal;
- mental health impacts; impacts on general health;
- avoidable hospital admissions; and
- increased stays in hospital due to lack of accessible housing to return to ('bed blocking').

The Habinteg toolkit also states 'Department of Health data that one night in hospital costs the NHS around £273; while one week's residential care averages £550. So the estimated £521 cost of building a 3-bedroom home to lifetime home standard would be met by just one week in residential care.'

The provision of accessible and appropriate housing can help prevent people from being admitted to hospital, encourage swifter discharge and support people wanting to remain independent in their community. As Lifetime Homes are designed to meet changing needs, people are able to remain at home with less likelihood of being placed in sheltered accommodation or nursing homes prematurely.

Lifetime Homes are built with accessibility, flexibility and adaptability incorporated at the design stage. Lifetime Homes dwellings have features including level access and doors wide enough for wheelchairs, and also meet the needs of parents (for example, pushchair access) and people with disabilities. Should the occupant's needs change, the homes are cheaper to adapt and there is minimal disruption to the occupant.

Evidence from the Housing Executive's Grants Department demonstrates that, converting a ground floor bathroom to wheelchair standards in a Lifetime Home, costs approximately £3,000. This is in comparison to adapting a house not designed to Lifetime Home standards, where a ground floor bathroom, often requires an extension. It is calculated that an extension and equipment for a wheelchair bathroom in a home designed without Lifetime Home standards costs approximately £13,350 or an independent wheelchair user, and £14,530 for an assisted wheelchair user. Additional evidence from Housing Executive's Grants Department states that a the cost of adapting a private sector home, to provide a ground floor bathroom and bedroom, often requires an extension and costs in excess of £25,000. Accessible housing, therefore, provides

substantial savings in publically financed Disabled Facilities Grants (DFGs). In addition, as DFGs are means tested for adults, some households who require an adaptation could be placed under significant financial pressure in trying to self-fund accessible housing.

Proposed Policy

A suggested policy is:

All new housing will be required to comply with the Lifetime Homes Standard. In addition, at least **10%** of new dwellings on developments of 20 dwellings or more will be required to be built to wheelchair accessible standards.

The Lifetime Homes and Wheelchair standard dwellings must comply with the standards set out in DFC's Housing Association Guide, found at the following link: <https://www.communities-ni.gov.uk/collections/housing-association-guide>

Justification

Housing is considered a lifetime investment. The design, therefore, incorporates features which allows for flexible living over the lifetime of the occupants and the dwelling. Because Lifetime Homes and wheelchair housing will be suitable for older people, disabled people as well as non-disabled people, they will have a wider market of potential buyers and residents, increasing their value and the ease with which they can be sold.

Implementation

Compliance

All new developments, and particularly housing, shall be designed from the outset to promote inclusive design, and ensure that all measures needed to promote accessibility and adaptability is achieved in a visually acceptable manner. This will relate to both facilities needed in the wider public realm and to the individual access arrangements for each building. Developers, therefore, are encouraged to consider the needs of disabled people and others with special access requirements at an early stage in the design process.

From the feasibility stage of the design, process developers should:

- consult the housing design standards within the LDP Plan Strategy to build in appropriate allowance for the full range of standards;
- consult DFC's Housing Association Design Guide on affordable housing, lifetime homes and wheelchair user unit standards; and
- Check the LDP Local Policies Plan for additional requirements, for example local advice on the mix of housing types and sizes.

At planning application stage, a statement of compliance with the standards outlined above should be provided within a design and access statement or concept plan. This should contain information including the number of new homes, the dwelling size, mix and type (bedrooms/occupancy) belonging to each tenure, and the number of wheelchair accessible homes.

The developer has responsibility for the design and/or specification of the dwelling/development, has overall responsibility to ensure that all Lifetime Homes and wheelchair units design and specification requirements are met.

Developers and architects seeking advice on design and dwelling layouts to meet accessible housing standards can appoint an Access Consultant from the National Register of Access Consultants (NRAC), to assess and provide advice on proposals. A list of consultant can be found on the NRAC website: <http://www.nrac.org.uk/>

Councils in GB have either planning application case officers or nominated planning officers who consider a planning application's drawings, and accompanying Design and Access Statements, where accessible standard dwellings have been specified as a planning requirement. Some councils also have a specialist Access Officer who acts as a central point of contact for advice and guidance.

Evidence from Housing Executive's Development Programme Group's architect suggest that once a planner or officer is familiar with Lifetime Home and Wheelchair standards, it will not take a significant amount of time, or difficulty to check standards.

Once a wheelchair unit is completed, the developer must contact the Housing Executive, in order that the unit is recorded on the Accessible Housing Register.

Examples of planning conditions

The Housing Executive would like to see the LDP ensure:

1. All housing units must be designed to accessible housing standards. A minimum percentage (e.g. 10%) of private units within the development will be designed to be wheelchair accessible, with the remaining housing complying with Lifetime Home standards. The housing design will adhere to wheelchair and Lifetime Home standards set out in DFC's Housing Association Guide.

Reason:

Wheelchair accessible housing and housing to Lifetime Homes standards will allow older and disabled people to feel safe and secure, and to be fully integrated within the residential community.

2. All residential houses and flats shall be constructed in full compliance with the Department of Communities' Housing Association Guide Lifetime Homes standards.

Reason:

To secure accommodation to meet the needs for different sections of the community, in accordance with Policy XX of the Fermanagh and Omagh District Council Local Development Plan Strategy.

3. At least XX number of the residential units hereby permitted shall be constructed so that they are either wheelchair accessible or easily adaptable for wheel chair users; as set out in the Department of Communities' Housing Association Guide - Annex A Specific Wheelchair Housing Design Standards.

Reason:

To secure accommodation to meet the needs for different sections of the community, in accordance with Policy XX of the Fermanagh and Omagh District Council Local Development Plan Strategy.

Conclusions

The Housing Executive believes that the ability to access a home is a basic right, not an optional extra. However, disabled people, are already excluded from homes built to poor design standards. Building inaccessible housing means erecting avoidable barriers.

Demographic evidence shows that more of us are living longer. Even with good levels of health, this means many people are living with impairments and life-limiting conditions. Families with young children, with wider family visiting regularly, those with disabled or older relatives who want to visit or reside for a while will all benefit from housing that is built to easy to incorporate, inexpensive, inclusive principles adding to the social cohesion of a community.

There is widespread consensus on the both evidence of need for and the cost savings to wider economy from accessible homes. Therefore, accessible homes should not be considered as specialist housing but mainstream housing as they are sustainable, well designed, and inclusive. As the population ages, there is an increasing market for more adaptable and accessible homes, and this should be reflected in the Fermanagh and Omagh District Council LPD.

Appendices

Appendix 1: Lifetime Homes Principles

<http://www.lifetimehomes.org.uk/pages/lifetime-homes-principles.html>

The Lifetime Homes Standard was established in the mid-1990s to incorporate a set of principles that should be implicit in good housing design. Good design, in this context, is considered to be design that maximizes utility, independence and quality of life, while not compromising other design issues such as aesthetics or cost effectiveness.

The Lifetime Homes Standard seeks to enable 'general needs' housing to provide, either from the outset or through simple and cost-effective adaptation, design solutions that meet the existing and changing needs of diverse households. This offers the occupants more choice over where they live and which visitors they can accommodate for any given time scale. It is therefore an expression of Inclusive Design.

Housing that is designed to the Lifetime Homes Standard will be convenient for most occupants, including some (but not all) wheelchair users and disabled visitors, without the necessity for substantial alterations.

A Lifetime Home will meet the requirements of a wide range of households, including families with push chairs as well as some wheelchair users. The additional functionality and accessibility it provides is also helpful to everyone in ordinary daily life, for example when carrying large and bulky items. Lifetime Homes are not, however, a substitute for purpose-designed wheelchair standard housing. Many wheelchair users will require purpose-designed wheelchair housing. Planners and providers should therefore ensure that good provision is made to meet this need.

The Lifetime Homes Principles

The Lifetime Homes concept is based on five overarching principles. These inform and establish the functional basis for the statements of principle that have been introduced for each of the sixteen Lifetime Homes criteria.

Principle One: Inclusivity

An inclusive environment aims to assist use by everyone, regardless of age, gender or disability. It does not attempt to meet every need, but by considering people's diversity it aims to break down unnecessary barriers and exclusion. The design of a

Lifetime Home removes the barriers to accessibility often present in other dwellings. The flexibility and adaptability within the design and structure enables a Lifetime Home to meet a diverse range of needs over time. A development of Lifetime Homes therefore has the potential to provide for the widest cross-section of individuals within the general population. The high level of accessibility offers greater 'visitability', so that an individual is not prevented from visiting a household due to the design of the home.

Principle Two: Accessibility

Inclusive design aims to give the widest range of people, including those with physical and/or sensory impairments, older people and children, convenient and independent access into and around the built environment (externally and internally) and also equal access to services. A Lifetime Home will be designed with particular attention to circulation within the home and external routes to transport infrastructure. Pathways, hallways, stairways and access to floors above, doorways and spaces to approach and reach essential facilities and controls in the home will be taken into consideration.

Principle Three: Adaptability

Adaptability means that a building or product can be simply adapted to meet people's changing needs over time or to suit the needs of different users. Any subsequent adaptations should be more cost-effective because the original design accommodates their future provision from the outset. In a Lifetime Home, non-apparent integral design features are ready to assist adaptation for a household that has a family member with a temporary or permanent disability or a progressive condition that is making movement around the home or between floors difficult. A member of the household, or a visitor, will be able to live, sleep and bath solely on the entrance level for a short period, or can benefit from step-free access to upper floor facilities.

Principle Four: Sustainability

Sustainability, in this context, refers to sustainable communities underpinned by essential accessible elements aimed at meeting current and future needs, including homes, facilities, goods and services – the design of which will contribute to the long term viability of the community. The accessibility, flexibility and adaptability of a Lifetime Home all help to ensure long term demand for, and desirability of the dwelling. While sustainability is dependent on a range of factors, dwellings that offer this degree of accessibility and flexibility are likely to remain popular over time, for

both existing and new households, and can therefore contribute to the creation of stable and popular neighbourhoods and communities.

Principle Five: Good Value

Lifetime Homes are not intended to be complicated or expensive for house-builders or for the people who live in them. The design criteria have been carefully considered so that they can be incorporated into a dwelling's design and construction from the outset with only a marginal cost effect. Research undertaken by Davis Langdon and Elemental Energy on behalf of the Department for Communities and Local Government confirms this.

Once occupied, the adaptability of the dwelling should actually save a household money if needs change and the dwelling is quickly and simply adapted to suit the new set of circumstances. Without Lifetime Homes features, the household may be faced with expensive, complicated and disruptive major adaptation works to a dwelling less suited to change; or possibly (in the case of an existing household) face a forced move to a more suitable home. This inherent flexibility also represents better value for the wider economy, as a greater supply of such homes can accommodate the changing needs of the growing population of older people and reduce future need for specialised housing

Appendix 2: DFC's Housing Association Design Guide, Annex A - Specific Wheelchair Housing Design Standards

The standards found in the link below, represent the baseline provision for generic wheelchair user needs.

<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/hagds-annex-a-specific-wheelchair-housing-design-standards.pdf>.