

Independent Examination
Fermanagh and Omagh District Council Local Development Plan
2030
Draft Plan Strategy
Questions for week 3

TUESDAY 8TH FEBRUARY 2022

Topic 10: Strategic Allocation and Management of Housing Supply

Issues

- **Phasing**
- **Windfall**
- **Allocation of growth to the countryside**
- **Settlement Hierarchy**

Participants:

Phasing, Windfall and Allocation of growth to the countryside

- Fermanagh and Omagh District Council
- Mr Stephen Keenan
- Mr John Carrigan
- Department for Infrastructure

Settlement Hierarchy

- Fermanagh and Omagh District Council
- Camphill Community Clanabogan

1. Should there be an indication of the housing provision for each settlement within the Draft Plan Strategy to establish a framework for more detailed housing requirements in the LDP?
2. In light of the proposed 23% allowance to the countryside, is the allocation to main towns consistent with the Spatial Growth Strategy objective to strengthen the role of the hubs as residential centres?

3. Should the rural dwelling completions between 2012 and 2017 contribute to meeting the housing need indicated by the HGI for the period 2012-2025?
4. Document FODC 109 (page 19) states that the allocation to the countryside is 989 when the new HGI figure for the period 2016-2030 is applied. Given that Table G within the Updated Housing Land Studies paper November 2019 (Document FODC 309) would appear to indicate that 533 rural dwellings were completed in the period 2016-2019 and Paragraphs 6.1 and 6.6 of the same document indicate that the average rural approval rate between 2012-2019 was 66 dwellings per year, notwithstanding the policy under which they were approved, is the allocation figure of 989 for the period 2016-30 realistic?
5. Will the housing allocation for 2019-2030, set out in proposed amended Table 4 within Document FODC 110, support the distribution of housing growth indicated in Figure 5 of the dPS?
6. Are there disparities between the indicative housing need figures in revised Table 4 of Document FODC 110 and Updated Housing Paper November 2019 (Document FODC 309)? For example, within Tables C and F within the Housing Paper Omagh has an indicative housing need of 939 in the period 2019-2030 however this is 983 within Table 4 of Document FODC 110 and a remaining housing balance figure of 2,608 is given in the Housing Paper (Table C page 4) whilst a 2,660 figure for 2019-30 is proposed within Document FODC110.
7. Has the windfall potential identified within Table F of the Updated Housing Paper November 2019 (Document FODC 309) been taken into account in the strategic allocation of housing land to the settlements?
8. Section 9(5) of the Planning Act 2011 states that the LDP is to be consistent with the Plan Strategy. Is proposed change 9 within Document FODC 110 seeking to build flexibility into the housing allocation? Is it anticipated that a later adjustment to the housing allocations is likely to require further adjustment to the PS in order to ensure the two documents are consistent?
9. The Draft Plan Strategy's approach to manage both the oversupply of housing and the potential for this oversupply to continue is through a phased release of land. Proposed change 11 within Document FODC 110 would however appear to alter the proposed approach within Draft Strategy Policy SP 03 whereby it is now proposed that once committed housing sites with extant planning permission or sites which are under development have been taken into account that Phase 1 sites will be identified whereas it was originally stated within the Draft Plan Strategy that Phase 1 will include committed housing sites with extant planning permission or sites which are under development. Is proposed change 11 a focused or minor change? Is it required to make the plan sound?
10. Appendix B1 within the Updated Housing Paper (Document FODC 309) indicates that hard commitments are zoned and unzoned sites all with extant planning permission or where development has commenced. Can phases 1 and 2 be made up of sites 'whether that be hard or soft commitments, or other sites' (paragraph 3.2.4 of Council's response to queries raised by Planning Appeals Commission 20th October 2021) if committed housing sites with extant planning permission are already going to be taken into account prior to the identification of Phase 1 sites as stated in the proposed change (No.11) to Draft Strategy Policy SP 03?

11. Does Draft Policy HOU 01 permit the use of unzoned greenfield land without consideration of Phase 2 or Reserved sites identified through Draft Policy SP03?
12. Will all villages and small settlements with identified housing needs have Housing Policy Areas?

Settlement Hierarchy

Although I do not have any questions on Draft Strategic Policy SP02 Settlement, Camphill Community Clanabogan would like to be heard on this matter. Mr Archdale this is your opportunity to raise your concerns after which I will give the Council the opportunity to respond.

WEDNESDAY 9TH FEBRUARY 2022

Topic 11: Infrastructure-Transportation

Issue: Integration of land use and transport

Participants:

- Fermanagh and Omagh District Council
- Department for Infrastructure

1. Has the principle of the integration of land use and transport been given appropriate consideration in the identification of the settlement strategy and housing allocations?
2. Has accessibility analyses been utilised to identify areas of growth within the Council's settlement strategy?
3. 'Guidance on accessibility analyses and planning policies for transport' was published by DfI on 30 June 2021; what are the implications for the Draft Plan Strategy?
4. DfI Transport Planning and Modelling Unit/Transport Policy Directorate response to the Schedule of Proposed Changes (SPCDPS0024, page 4) refers to the emerging Local Transport Strategy (LTS) stating that the dPS should be consistent with the objectives and measures contained within the LTS. However, within Document FODC 109 the Council state that DfI are no longer bringing forward a Local Transport Strategy but rather are proposing to publish a Local Transport Study for each Council area; as a result, the Council state that any comments made with reference to the LTS are irrelevant. Could the Council please clarify what is the current position and its implications?

Topic 12: Infrastructure-Waste Management**Issue: Waste Management Treatment Works****Participants:**

- Fermanagh and Omagh District Council
- Department for Infrastructure (317)

5. The Council's response to my query about sewerage infrastructure capacity dated 20th October 2021 is acknowledged. However, when the adjusted HGI allocation is compared to the hard commitments (Document FODC 309, page 19) there are numerous settlements which have an allocation exceeding the level of hard commitments; for example, Drumquin has a housing need of 26 dwellings however planning permission has been granted for 8 units. What happens if there are still capacity issues within the settlements where housing growth is required? What are the implications for the housing growth strategy?

Topic 8: Economy-Industry and Business

Issue: Industry and Business Development in the Countryside

Participants:

Industry and Business Development in the Countryside

- Fermanagh and Omagh District Council
- Mr Emmet McAleer
- Mr Patrick Haughey
- Department for Infrastructure-Planning and Roads

Questions

1. Is Draft Policy IB 04 compatible with Paragraphs 6.87 and 6.88 of the SPPS? Should criterion (e) of Draft Policy IB 04 make reference to a major industrial proposal being otherwise acceptable, particularly in terms of its environmental and transport impacts, as per the second bullet point of Paragraph 6.88 of the SPPS?

Topic 13: Infrastructure-Flood Risk Management

Issue: Flood Risk

Participants:

- Fermanagh and Omagh District Council
- Mr Patrick Haughey (259, 311)
- Mr Emmet McAleer (296)
- Department for Infrastructure-Planning

1. The Council's response to my query about flood defence infrastructure dated 20th October 2021 is acknowledged. DfI Second Cycle Draft NI Flood Risk Management Plan 2021-27 (December 2020, page 29) states that it is expected that new LDPs will provide appropriately worded and suitably future proofed floodplain definitions to enable the continued implementation of the presumption against development in both present day and climate change flood map areas. DfI Rivers consider that the Proposed Change 107 contained within Document FODC 110 is ambiguous and they provide a recommended definition for flood plains with climate change included. Is proposed change 107 a focused or minor change? Is it required to make the plan sound? Is Proposed Change 107 appropriate?
2. In relation to the sewerage infrastructure capacity, the Council commented on 20th October 2021 that housing need is likely to come from commitments which may

already have been assessed. Is this comment also applicable in relation to flood risk?

3. In terms of Draft Policy FLD 02, in light of the precautionary approach to flood risk management, would it be appropriate to take account of DfI Rivers' suggested change to Proposed Change 108: 'the Council will *not* support new development at risk from surface water flooding elsewhere *unless* it is demonstrated *through* the drainage assessment that adequate drainage measures will be put in place...' and that a drainage assessment *must accompany* the types of applications identified? Is proposed change 108 a focused or minor change? Is it required to make the plan sound?
4. Where a Drainage Assessment is not required under policy but where there is potential for surface water flooding, as indicated on Flood Maps NI, would it be appropriate for the Plan Strategy to state that it is the developers' responsibility to assess the flood risk and drainage impact to mitigate the risk to the development and any impact beyond the site?
5. In terms of Draft Policy FLD 04, the policy headnote states that development proposals located beside a flood defence, control structure or designated watercourse must provide a working strip of a minimum of 5m however Paragraph 6.17 of the policy clarification states that the working strips will normally be up to 10m in width. Is there sufficient clarity as to what width is required? Should this requirement apply to along all watercourses and should it be stated that it should be level?