

BY EMAIL & POST

18th December 2018

Our Ref: C04068

Development Plan Team
Planning Department
Strule House
16 High Street
Omagh
BT78 1BQ

Dear Sir/Madam,

Re: Response to the Fermanagh & Omagh District Council Draft Plan Strategy (DPS) – Lands located at Dooish Road, Dromore

This letter is submitted on behalf of our client, Newpark Homes, and relates to the publication of the Draft Plan Strategy (DPS), the second stage in Fermanagh & Omagh District Council's Local Development Plan process. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 Did the council take account of the Regional Development Strategy?*
- C2 Did the council take account of its Community Plan?*
- C3 Did the council take account of policy and guidance issued by the Department?*
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 *The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 *The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 *There are clear mechanisms for implementation and monitoring; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

Fermanagh & Omagh District Council Vision

“Our Vision is 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.”

We **support** this vision as it a positive statement of the shape the council area should take come 2030 and reflects the desire for the Council area to be an active place with strong communities and which recognises that the rural area is a home to many people within the district. It also sets out its stall that the quality of life for people will have significantly improved and the Council area will have become a better place in which to live and work over the plan period.

Strategic Objectives

On p27-29, Table 1 the council sets out 18 Plan Strategy Objectives broken up into three broad categories:

- Social
- Economic
- Environmental

We are **generally supportive** of these 18 objectives, with the exception of two of the objectives as discussed below.

Plan Strategy Objective 4

Plan Strategy Objective 4 (below) should be updated to reflect our suggested revised housing growth figure (5, 878) for the district over the plan period as discussed in detail on page 5.

4	Provide for 5,190 ² 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.	3. Our communities are inclusive, safe, resilient and empowered
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²The Revised Housing Growth Indicator for FODC for the period 2012-2025 is 4,500. This translates to 6,230 dwellings up to 2030 and 5,190 dwellings for the period 2015-2030.

Plan Strategy Objective 4

Soundness Test

- Plan Strategy Objective 4 (PSO 4) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth of 5,190 underestimates the housing need for the district over the plan period, as detailed on page 5 of this submission.

Remedy

- Revise PSO 4 to update the housing growth figure to provide 5, 878 new homes within the district by 2030.

Plan Strategy Objective 7

We are supportive in principle of plan strategy objective 7 (below) which seeks to create 4,875 new jobs over the plan period. However, this figure should be revised upwards in line with the uplifted figure for housing growth as set out above.

	Economic	Economy, Infrastructure and Skills
7	Promote sustainable economic development and growth by facilitating the creation of 4,875 ³ new jobs by 2030 and providing a sufficient supply of economic development land through a range and choice of sites, taking into account accessibility by public transport and active travel ² modes.	Aim: To improve employment opportunities for all by supporting the development and growth of a more sustainable local economy and better connected area.

Plan Strategy Objective 7

Soundness Test

- Plan Strategy Objective 7 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on robust evidence (Test CE2). The creation of 4,875 jobs has been calculated based on the level of jobs required to sustain a projected housing growth of 5,190 homes over the plan period and therefore would not be adequate to sustain growth based on 5,878 homes in the district over the plan period.

Remedy

- Revise job creation figure upwards to 5,520 jobs in line with our suggested revised housing growth figure.

Draft Strategy Policy SP02 - Settlement

We support this policy and the amplification provided by Table 2 on p36 which sets out the Settlement Hierarchy Classification for the district and classes Dromore as a Local Town. Dromore is strategically located between Omagh and Enniskillen and therefore rightly occupies a position within the hierarchy as a Local Town acting as a satellite to the main areas of growths.

Table 2: Settlement Hierarchy Classification

Settlement Type	Scale and level of existing facilities	Settlements
Main Town	Focal point for employment, shopping, housing, leisure, cultural and social facilities	Enniskillen Omagh
Local Towns	Smaller towns providing a small range of goods, services, leisure and cultural facilities.	Fintona, Dromore, Carrickmore, Irvinestown, Lisnaskea
Villages	Local service centres which provide for opportunities for housing, employment and community/leisure facilities appropriate to their scale and character.	Ballinamallard Belcoo Bellanaleck Belleek Beragh Brookeborough Clabby Derrygonnelly Derrylin Donagh Drumquin Ederney Garrison Greencastle Gortin Kesh Kinawley Lisbellaw Lisnarick Loughmacrory Maguiresbridge Mountfield Newtownbutler Tullyhummon (part of Pettigo) Rosslea Seskinore Sixmilecross Tempo Trillick
Small Settlements	Settlements with few or minimal facilities and infrastructure.	Ardess Arney/Skea Altamuskin Ballycassidy/Laragh/ Trory Carranbeg/Roscor Carrontremall Carrybridge Church Hill Clanabogan Creggan Dooish Drumduff Drumnakilly Dunmoyle Dunmullan Edenderry Eskragh Florencecourt/ Drumlaghy Garvaghey Gillygooley Glennull Gortaclare/Moylagh Gortnagarn Holywell Killadeas Killesher/Derrylester Kilskeery Knockmoyle Lack Letterbreen Magheraveely Mullinaskea Monea Mountjoy Newtownsaville Roscavey Rousky Springfield Tamlaght Tattyreagh Teemore Tircur Tummeny Whitehill

Table 2: Settlement Hierarchy Classification

In particular we support Table 3, on p38 which provides a summary of the scale of development appropriate to each tier of the settlement hierarchy. The policy recognises that allocations for housing in local towns can be permitted within defined physical limits as opposed to a settlement limit. This is a flexible approach.

Table 3: Summary – Scale of Development Appropriate to Each Tier of the Settlement Hierarchy

Housing	Industry and Business	Retail
Main Towns		
Allocations for large scale housing development and with an emphasis on brownfield sites within the Urban Footprint.	Allocations of large scale sites to meet strategic employment needs. Range of general and local employment opportunities. Emphasis on retention of existing employment land to provide opportunities both for expansion and re-use.	Town centres – focus of a range of provision – large scale retail, leisure, community, cultural Local Neighbourhood Centres – to be identified Emphasis on protecting existing centres
Local Towns		
Allocations for small scale housing development. Within the defined physical limits development to be permitted in the form of: (i) modest sized estates where consistent with local scale and character; (ii) groups; (iii) infill	Allocations of small scale sites to meet local needs. Emphasis on local employment/small rural businesses. Where provision exists, emphasis will be on retention to provide opportunities for expansion and start-up.	Depending on size of settlement, provide a small range of goods, services, leisure and cultural facilities. Emphasis will be on retaining range of provision to meet the needs of the town and its rural hinterland whilst supporting their role as local service centres.

Table 3 – Summary – Scale of Development Appropriate to Each Tier of the Settlement Hierarchy

Strategic Allocation of Land for Housing

In paragraph 6.22, page 39 the Council discusses the strategic allocation of land for housing within the district and specifies a housing target for the district to provide 5,190 new homes for the period 2015-2030.

However, the HGI figures (i.e. 5,190) on which the allocations are based are flawed, resulting in an under allocation of dwellings over the plan period 2015 – 2030 for the Fermanagh Omagh District Council area.

The HGI figure produced by the Department for Regional Development (DRD) in January 2016 was calculated taking into account LPS new dwelling completion data between 2010-2015 (extract attached, Annex 1). Due to sluggish economic conditions during this period, the number of completed dwellings is strongly under representative and not a sound statistical base upon which to project new dwelling requirements for the plan period 2015 – 2030. A much more robust figure to base future allocations on is the new dwelling completion data over the period 1998 – 2013 contained within the Northern Ireland Housing Land availability Summary Report 2013 (DoE, July 2014 Revision, Annex 2). This period is not only 10 years longer than the current period used, but it also contains periods of both strong and weak economic growth and is therefore a much more sound statistical base to use to calculate actual housing allocation numbers in the Local Development Plan.

The combined build out rate over the period 1998-2013 for Fermanagh and Omagh District Councils as per the DoE 2014 Summary Report was 5,878 dwellings (3,238 and 2,640 respectively). The latest HGI for the combined Fermanagh Omagh District Council Area is 5,190 dwellings which is a shortfall

of 688 dwellings. This shortfall represents a significant under-allocation of dwellings for the Fermanagh & Omagh District Council Area for the plan period 2015-2030. Accordingly, the housing projection figures on which the strategic housing allocation is based in the Draft Plan Strategy needs to be updated. The current methodology is highly unsound.

The HGI figures referred to in the RDS are not targets, they are instead “produced as a guide for those preparing development plans” and are “an estimate of the new dwelling requirement” (page 100, RDS 2035). This is echoed in paragraph 6.139 of the SPPS which states that housing allocations in LDPs should be informed by the RDS HGIs. This terminology does not prevent Councils from calculating their own HGIs on which to base the LDP housing allocations, with (of course) a sound evidential base for doing so.

Sections 8(5)(a) and 9(6)(a) of the Planning Act (Northern Ireland) 2011 require Council’s to “take account” of the RDS in the preparation of the Plan Strategy and Local Policies Plan. There is no legislative requirement to slavishly adhere to the HGIs in the RDS or to prevent Council from determining its own housing projection figures upon which to base their LDP housing allocation (having taken into account the RDS figures) over the period 2015 -2030.

The current HGI figures used in the Draft Plan Strategy should be reassessed to take into account more robust dwelling completion data. The logic for such a move is particularly clear when the discrepancy from the previous HGI allocation figure of 12,900 is taken into account. Whilst we are not advocating using this original allocation figure, a more robust and sound approach would be to base allocations on the Housing Land Availability Report (July 2014 revision), meaning an allocation of 5,878 dwellings should be used for the Fermanagh Omagh District Council Area for the plan period 2015-2030.

Soundness Test

- The HGI figure on which the housing allocation is based is not sound, as the housing growth projection is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is and not based on a robust evidence base (Test CE2). Basing the housing allocation on the HGI figure would leave significant shortfall of 688 dwellings over the plan period.

Remedy

- Revise housing growth allocation upwards to 5, 878 units in line with the Housing Availability Report (July 2014).

As set out in this submission, the HGI figures on which the housing allocations have been calculated is flawed, resulting in an under allocation of 688 units over the plan period 2015 – 2030 for the Fermanagh & Omagh District Council area. The strategic housing allocation would see 30% of the allocation going to local towns, villages and small settlements, equating to 1,763 units based on an uplift of 688 units. As Dromore is one of the identified local towns and sits just below the main towns of Enniskillen and Omagh in the settlement hierarchy, it should have a larger percentage share of these 1,763 dwellings.

Within paragraph 6.25, page 40, the Council state that after taking in account completions since 2015, that a balance of 4,001 of the 5,190 new homes provision by 2030 will be required.

Table 4, page 40, sets out how the Council propose to split the housing allocation amongst the settlement hierarchy as well as the amount of land required based on broad densities bands for each settlement type.

Table 4: Strategic Allocation of Land for Housing

		Housing Need (2017-2030)	
		Dwellings	Land (Hectares)*
Main Towns	Enniskillen	979	39.1
	Omagh	1,507	60.3
	Total	2,486	99.4
Local Towns	Carrickmore	28	1.4
	Dromore	83	4.2
	Fintona	97	4.8
	Irvinestown	151	7.5
	Lisnaskea 1	82	9.1
	Total	541	27.0
Villages and Small Settlements	Total	974	64.9

*Calculated at an average density of: 25 (Dwellings per Hectare) DPH in Main Towns, 20 DPH in Local Towns, 15 DPH in Villages and Smaller Settlements

Table 4: Strategic Allocation of Land for Housing

Table 4: Strategic Allocation of Land for Housing

		Housing Need (2017-2030)	
		Dwellings	Land (Hectares)*
Main Towns	Enniskillen	1,144	45.7
	Omagh	1,763	70.5
	Total	2,906	116.2
Local Towns	Carrickmore	32	1.6
	Dromore	97	4.8
	Fintona	113	5.6
	Irvinestown	176	8.8
	Lisnaskea 1	213	10.6
	Total	631	31.4
Villages and Small Settlements	Total	1,141	76.1

*Calculated at an average density of: 25 (Dwellings per Hectare) DPH in Main Towns, 20 DPH in Local Towns, 15 DPH in Villages and Smaller Settlements

*Revised Table 4: Strategic Allocation of Land for Housing
(suggested update based on 5,878 housing growth target)*

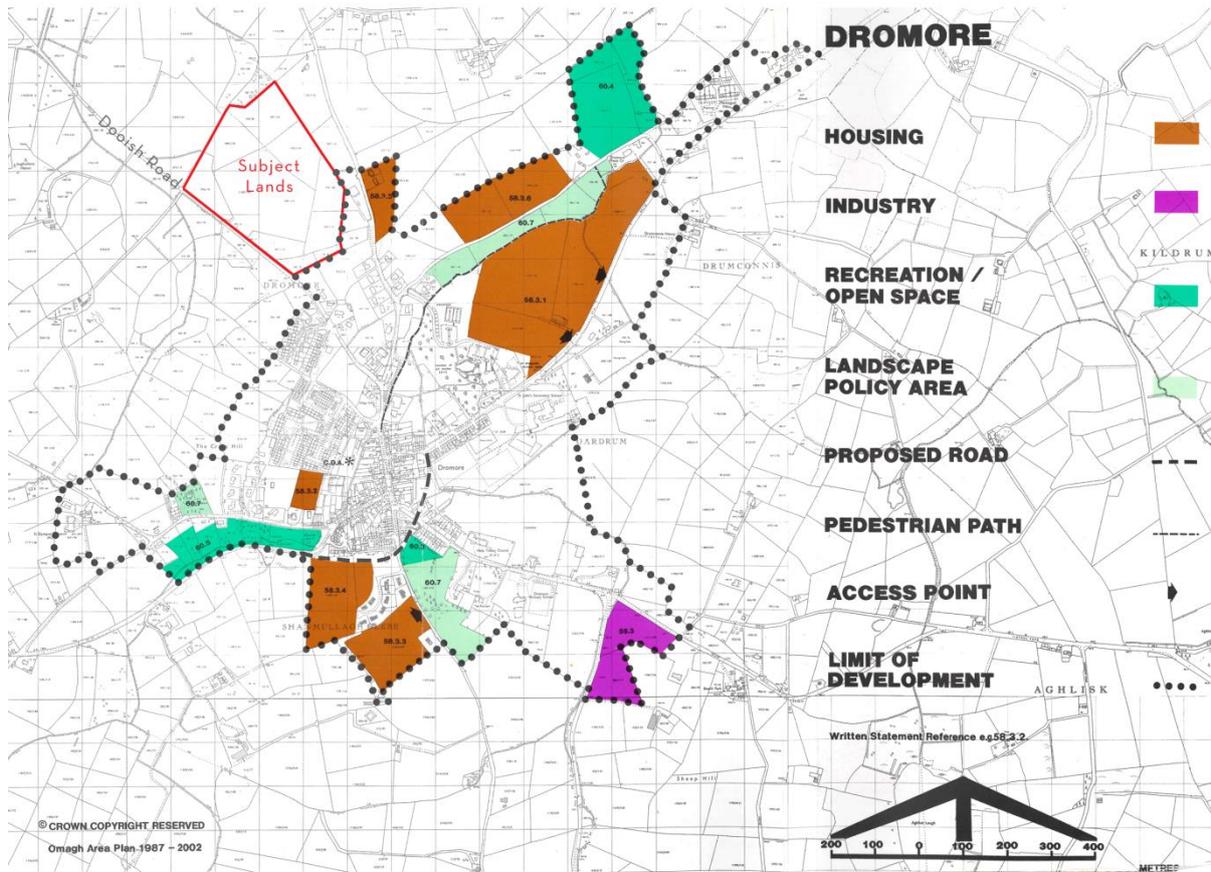
Soundness Test

- Table 4: Strategic Allocation of Land for Housing is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) nor is it based on robust evidence (Test CE2). The projected housing growth of 5,190 homes over the plan period is not a flexible or robust figure and would not be able to respond to unexpected growth. The housing growth figure (5,190) is not based on sound evidence as previously stated in this submission and would leave a housing shortfall in the district over the life of the plan.

Remedy

- Table 4 should be revised to use the housing growth figure of 5,878 as the base and apportion the uplift on a pro rate basis across the settlements, as per our revised table.

Review of Existing Housing Zonings with Dromore



Dromore Housing Zonings as per Omagh Area Plan 1987-2002

The extant area plan (Omagh Area Plan 1987-2002) had zoned 16.1ha for residential development in Dromore, of which c. 13ha is now fully developed or committed for housing (see Table 1 below). The remaining 3.1ha is spread over two different zonings (58.3.3 and 58.3.4). There is no evidence of any planning application being made or granted for residential development on these lands within the last 5 years. Therefore, one must conclude that there is a lack of appetite or willingness to develop the remaining zoned lands. The land-owners have had over 28 years to develop their lands for residential use, as per the extant area plan, and have not done so. Considering this, the Council should not rely on these already zoned lands to deliver housing units over the new local development plan period and should rather seek and zone alternative lands that are more likely to be developed.

Ref	Site	Size (ha)	Status
58.3.1	Main Road to Omagh	8.3	Built out
58.3.2	North of the Church Brae	0.7	Built out
58.3.3	Stoneybatter	1.6	No evidence of appetite to develop
58.3.4	Stoneybatter and Irvinestown Road	1.5	No evidence of appetite to develop
58.3.5	East of Drumquin Road	1	Built out
58.3.6	Crawford’s Lane	3	Committed Housing site - K/2007/0889/F – 75 no. units - Permission Granted 7 th August 2012. Site works commenced.

Table 1 – Existing Housing Zonings within Dromore (Omagh Area Plan 1987 – 2002)

Draft Strategic Policy SP03 – Strategic Allocation and Management of Housing Supply

Draft Strategic Policy SP03 – Strategic Allocation and Management of Housing Supply

Phase 2 or Reserve Sites

Where it is evident that the number of permissions (commitments) significantly exceeds the future housing need for the plan period within a settlement the following approach will be taken in the LPP:

- (i) Housing sites will be identified for allocation beyond the plan period i.e. beyond 2030. These will only be released at an earlier time within the plan period (i.e. before 2030) where it is evident through either monitoring or the re-appraisal of future housing need that these housing sites will be required. The exact criteria and mechanism for how these sites could be released will be outlined within the LPP.
- (ii) Development proposals for housing on unallocated 'greenfield sites' that are within the Settlement Limits will not be supported as they would undermine the strategy. This will also apply to development proposals for the renewal of existing and lapsed planning permissions (i.e. existing commitments) on 'greenfield sites'.

We **do not support** this policy and would respectfully suggest that the council remove this policy from the Draft Plan Strategy. The policy is too restrictive and inflexible. On page 70 of the SPPS, it states that "the use of greenfield land for housing should be reduced", it does not state that housing on greenfield sites should not be permitted at all, which is what this policy seeks to achieved. If unzoned land lies within a settlement limit then it ought to be in principle suitable for a range of uses, including housing. This approach could restrict the supply of suitable housing land within the towns and inflate houses prices where there is increased demand. In some cases, zoned sites may never be developed, as demonstrated by the review on page 9 of the existing housing zonings within Dromore. A phased approach to the release of housing land could prevent other, more suitable and viable sites such as the subject lands from being developed. In addition, the policy wrongly assumes that all permissions will translate into the delivery of homes.

Soundness Test

- Draft Strategic Policy SP03 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) i.e. unexpected growth. The policy assumes that all permissions will be built and under this approach permissions that are not built could prevent more viable lands from being developed for housing. It also could restrict the supply of housing land and where there is strong demand this would push up house prices.

Remedy

- This policy should be omitted from the Draft Plan Strategy.

Draft Policy HOU1 – Housing in Settlements

Draft Policy HOU01 – Housing in Settlements

(a) Towns

The Council will support proposals for housing on zoned and brownfield land within the towns and will only permit proposals for housing on unzoned greenfield land where either:

(i) the future housing need and demand exceeds the number of permissions (commitments); or

(ii) it is demonstrated within the Housing Need Assessment that there is an unmet need for affordable housing which cannot be met through existing commitments.

(b) Other Settlements

Within villages and small settlements, housing will be permitted within Housing Policy Areas and where it is of a size and scale which is in-keeping with the size and scale of the settlement.

We **do not support** this policy and would respectfully suggest that the council remove this policy from the Draft Plan Strategy. The policy is too restrictive and inflexible and goes against regional policy direction whereby if unzoned land lies within a settlement limit then it ought to be in principle suitable for a range of uses, including housing. The exception where the future housing need and demand exceeds the number of permissions is flawed as it assumes that all planning permissions will be built out. In addition, this approach could restrict the supply of suitable housing land within the towns and inflate houses prices where there is increased demand.

Soundness Test

- Draft Policy HOU1 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) i.e. unexpected growth.

Remedy

- This policy should be omitted from the Draft Plan Strategy.

Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Therefore, we broadly support the monitoring indicators (33 no.) set out in Table 7 p 178 – 180, which are to be used to measure how well the plan is performing in terms of achieving it’s strategic objectives, including ensuring an adequate supply of housing for the district over the plan period. Table 8 provides a detailed explanation of each monitoring indicator.

Indicator 4 – New Dwellings approved across the settlement hierarchy and in the countryside and by land type

4	New dwellings approved across the settlement hierarchy and in the countryside and by land type		
Purpose	<p>To ensure that the location of new residential development aligns with the overall aim of sustainable and balanced pattern of development across the district with the focus for growth in the main towns, while sustaining the roles of local towns and smaller settlements. To ensure that the priority for new dwellings is brownfield sites within the Urban Footprint of Omagh and Enniskillen.</p> <p>To monitor the level of new dwellings which are 'windfall'. Over time this monitoring will help to determine if the strategic approach to housing delivery is effective.</p> <p>Where planning applications are considered in the countryside this will include analysis of policy from 'Housing in Countryside' and so as to ensure that these policies are robust in delivering appropriate level of housing in the countryside.</p>		
Relevant Policies	<p>SP01: Furthering Sustainable Development SP02: Settlement Policy SP03: Strategic Allocation and Management of Housing DE04: Sustaining Rural Communities HOU01: Housing in Settlements HOU09: Rural Replacement Dwellings HOU10: Replacement of Other Rural Buildings HOU11: Redevelopment of former site for dwelling HOU12: Dwelling on Farm Businesses HOU13: Dwelling in assoc. with the keeping & breeding of horses HOU14: Rounding Off and infilling HOU15: Dwelling to serve an Existing non-agricultural business HOU16: Personal and domestic circumstances HOU17: Social and Affordable Housing HOU18: Residential Caravans and Mobile Homes</p>		
Relevant Plan Objectives	1	Relevant SA Objectives	4 - Decent Homes 17 - Land and Soil Quality 20 - Reducing Disparity
Definition	<p>Developments of (net) one or more residential units. This can be new build, sub-division or change of use. The location will take account of the settlement hierarchy and settlements limits.</p> <p>Brownfield and Greenfield land - see Glossary.</p> <p>'Windfall' includes any permission which is not on a zoned/Phase 1 housing land and can include the change of use to residential and the sub-division of existing dwellings.</p>		
Target	<p>Delivery of 5,190 new homes by 2030.</p> <p>47% will be within main towns; 30% in local towns, villages and smaller settlements; 23% in countryside</p> <p>The RDS sets a regional target of 60% of new dwellings on appropriate brownfield land within the Urban Footprint of settlements with a population of more than 5,000 (i.e. Omagh and Enniskillen for the district). However given the rural / urban split within the district compared to the rest of NI this is unlikely to be achieved.</p> <p>There should be a notable reduction in the level of permission for Greenfield sites within settlements prior to the introduction of these policies.</p>		
Document/ Source	FODC analysis of data on planning applications and permissions.		

As previously stated throughout this submission the housing growth target of 5,190 is not based on robust evidence and it should be revised upwards to 5,878 units. Therefore the target figure in this monitoring indicator should be adjusted accordingly to reflect the suggest uplift.

Soundness Test

- Indicator 4 is not sound as the target housing figure under which the success of the plan is being assessed is not based on robust evidence (Test CE2).

Remedy

- Revise target to deliver 5,190 new homes by 2030 to a more robust figure of 5,878.

Indicator 5 – Housing Completions across the settlement hierarchy and in the countryside and by land type

5	Housing Completions across the settlement hierarchy and in the countryside and by land type	
Purpose	<p>To ensure that the location of new residential development aligns with the overall aim of sustainable and balanced pattern of development across the district with the focus for growth in the main towns, while sustaining the roles of local towns and smaller settlements.</p> <p>To monitor overall completions against the future housing need trajectory over the remainder of the plan period.</p> <p>By monitoring the rate of housing completions overtime we can identify if there is any change to the rate and location of completions compared to previous policies.</p>	
Relevant	<p>SPO1: Furthering Sustainable Development SPO2: Settlement Policy SPO3: Strategic Allocation and Management of Housing DE04: Sustaining Rural Communities HOU01: Housing in Settlements HOU09: Rural Replacement Dwellings HOU10: Replacement of Other Rural Buildings HOU11: Redevelopment of former site for dwelling HOU12: Dwelling on Farm Businesses HOU13: Dwelling in assoc. with the keeping & breeding of horses HOU14: Rounding Off and infilling HOU15: Dwelling to serve an Existing non-agricultural business HOU16: Personal and domestic circumstances HOU17: Social and Affordable Housing HOU18: Residential Caravans and Mobile Homes</p>	
Relevant Plan Objectives	1 3 4	Relevant SA Objectives 4 - Decent Homes 17 - Land and Soil Quality
Definition	<p>Developments of (net) one or more residential units. This can be new build, sub-division or change of use. The location will take account of the settlement hierarchy and settlements limits.</p> <p>Brownfield and Greenfield land - see Glossary.</p> <p>'Windfall' includes any permission which is not on a zoned/Phase 1 housing land and can include the change of use to residential and the sub-division of existing dwellings</p>	
Target	<p>Delivery of 5,190 new homes by 2030.</p> <p>While the PS Spatial Strategy provides a target for spatial distribution of: 47% of new housing within main towns; 30% in local towns, villages and small settlements; and, 23% in the countryside; it is unlikely this will be achieved in the short-to-medium term and given the large number of commitments both within the countryside and within settlements. As such, the target should be to see a shift towards this spatial distribution over time.</p>	
Document/Source	<p>FODC Annual Housing Monitor LPS Housing Starts and Completions data</p>	

Similar to our comments in respect of indicator 4 and as previously stated throughout this submission the housing growth target of 5,190 is not based on robust evidence and it should be revised upwards to 5,878 units. Therefore the target figure in this monitoring indicator should be adjusted accordingly to reflect the suggest uplift.

Soundness Test

- Indicator 5 is not sound as the target housing figure under which the success of the plan is being assessed is not based on robust evidence (Test CE2).

Remedy

- Revise target to deliver 5,190 new homes by 2030 to a more robust figure of 5,878.

Proposed Site for Inclusion within the Settlement Limits of Dromore

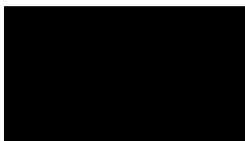
The site identified in this submission (Annex 3) on the Dooish Road is located just outside the current settlement development limit of Dromore – an identified ‘local town’ in the DPS. It is a suitable alternative site that could be zoned (without a phasing restriction) to accommodate housing land in lieu of the existing zoned residential land that is unlikely to be developed in the future as demonstrated on page 8. There is a sound rationale for including the identified site within the settlement limit to ensure viable and deliverable development land is available within Dromore, in order to sustain and consolidate this local town.

These lands are particularly well suited to accommodate expansion of the current settlement limit in line with its increased housing growth for the following reasons:

- The subject land is a logical extension of the existing development limit, as it does not impact on the landscape setting of the town.
- The lands directly abut the existing settlement limit.
- The subject lands would contribute towards meeting the housing need for Dromore over the plan period.
- The site fronts onto the Dooish Road making the lands directly accessible from a key route into and out of Dromore.
- Existing mature vegetation along the northern boundary of the lands will assist with integration of any future development into the landscape helping to contain views from the surrounding road network.
- The lands do not lie within any sensitive designation.

It is clear from the points set out above that the lands are appropriately located to contribute towards meeting the projected housing growth for the district. We would therefore respectfully request that they are considered as a housing zoning and brought within the settlement limit during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.



Gravis Planning

HGI figure produced by the Department for Regional Development (DRD)

LGD level Northern Ireland Housing Growth Indicators 2012-2025 - Estimating each of the 5 key components

Table 3.1: Estimate of housing need by Local Government District 2012-2025

Local Government District	A	B	C	D	E	F	G
	Number of Households 2025	Second Homes 2025	Vacant Stock 2025	Net Conversions, Closures and Demolitions 2012 to 2025	New Stock Estimate 2025	Housing Stock 2012	Projected New Dwelling Requirement 2012 to 2025
Antrim & Newtownabbey	58,400	400	4,600	200	63,600	56,400	7,200
Armagh, Banbridge & Craigavon	86,600	800	5,400	2,200	95,000	80,600	14,400
Belfast	147,900	2,200	15,300	2,300	167,700	154,000	13,700
Causeway Coast & Glens	57,300	3,700	5,600	2,100	68,700	62,000	6,700
Derry & Strabane	59,400	300	3,800	900	64,300	59,300	5,000
Fermanagh & Omagh	45,700	900	4,500	600	51,700	47,200	4,500
Lisburn & Castlereagh	60,400	500	3,500	700	65,000	55,400	9,600
Mid & East Antrim	57,800	100	4,100	800	62,800	57,400	5,400
Mid Ulster	55,200	100	3,800	1,500	60,600	51,100	9,500
Newry, Mourne & Down	70,900	900	5,100	500	77,400	66,500	10,900
North Down & Ards	68,800	1,000	4,900	1,100	75,800	68,700	7,100
Northern Ireland	768,300	10,800	60,400	13,000	852,500	758,500	94,000

Cells are rounded to the nearest 100. Calculations have been worked out using unrounded data. Therefore summing individual figures in the table above may not add to total.

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District	Sector	Units Complete 31-12-98 to 31-07-13	Units Complete 01-08-12 to 31-07-13	Area Developed (Hectares) 31-12-98 to 31-07-13	Area Developed (Hectares) 01-08-12 to 31-07-13	Units Dev. Within the Urban Footprint (%) 01-08-12 to 31-07-13	Available Potential (Hectares)	Available Potential (Dwelling Units)
OMAGH	Omagh (Town)							
	Urban Footprint		2		0.1		106.7	2326
	Greenfield		2		0.1		94.1	1584
	TOTAL	1847	4	99.4	0.2	50.0	200.8	3910
	Other Settlements	793	0	57.9	0		193.6	2636
DISTRICT TOTAL	2640	4	157.3	0.2	50.0	394.4	6546	

District	Sector	Units Complete 31-12-98 to 31-07-13	Units Complete 01-08-12 to 31-07-13	Area Developed (Hectares) 31-12-98 to 31-07-13	Area Developed (Hectares) 01-08-12 to 31-07-13	Units Dev. Within the Urban Footprint (%) 01-08-12 to 31-07-13	Available Potential (Hectares)	Available Potential (Dwelling Units)
Fermanagh	Enniskillen							
	Urban Footprint		1		0.1		74.7	1648
	Greenfield		4		0.2		118.5	1833
	TOTAL	979	5	46.4	0.3	20.0	193.2	3481
	Other Settlements	2259	15	156.1	0.8		330.5	5596
DISTRICT TOTAL	3238	20	202.5	1.1	20.0	523.7	9077	

Potential Site for Inclusion within Dromore Settlement Development Limit



Subject Site

CAMDERRY ROAD

DROMORE ROAD

DROMORE

Playground

Grave Yard

15 UMS

155

21

22

23a

23b

24

25

26

27

28

21

22

23

24

25

26

27

28

11

7

5

7

8

9