

Fermanagh and Omagh District Council Local Development Plan 2030 – Draft Plan Strategy

Invest NI Comments – December 2018

1. Invest NI welcomes the opportunity to consider the soundness of the Fermanagh and Omagh District Council Local Development Plan Draft Plan Strategy 2030 (the draft Strategy). Our comments should be read in conjunction with those made in relation to the Council's Preferred Options Paper (POP).
2. It is noted within the Strategic Planning Policy Statement (SPPS) that Councils in preparing their Local Development Plans (LDP) must take account of the RDS 2035, the Sustainable Development Strategy for Northern Ireland, the SPPS and any other policies or advice in guidance issued by the Department
3. In considering our comments we have taken account of the strategic direction set out within the Regional Development Strategy 2035 (RDS), the Strategic Planning Policy Statement (SPPS) as well as the Council's Community Plan - the Belfast Agenda.
4. As the regional business development agency for Northern Ireland Invest NI's role is to grow the local economy. For this reason our specific focus in reviewing the aforementioned documents has been on those elements of each that relate to economic development or, in our view, could have a particular resonance with economic growth.
5. As noted in our response to the POP) Invest NI can only speak on behalf of the spatial needs of those businesses meeting its intervention criteria, these will primarily be those which can drive productivity and make the greatest contribution to growing the economy. These include both indigenous and foreign owned businesses.

Regional Development Strategy

6. The RDS guidance that we have particularly focussed on, either in whole or in part, includes the following
 - RG1 – Ensure an adequate supply of land to facilitate sustainable economic growth
 - SFG10 - Identify and consolidate the roles and functions of settlements within the clusters
 - SFG11 - Promote economic development opportunities at Hubs
 - SFG15 - Strengthen the Gateways for regional competitiveness

Strategic Planning Policy Statement

7. The SPPS guidance that we have particularly focussed on is the section entitled Economic Development, Industry and Commerce found at paragraphs 6.79 to 6.98 inclusive. We have also considered elements of the section considering Development in the Countryside.

Community Plan

8. The Council's Community Plan sets out the vision for the district through to 2030 to be "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."
9. Underpinning this vision are three themes and eight shared outcomes; the economic theme is "Economy, Infrastructure and Skills" with the following outcomes
 - Our economy is thriving, expanding and outward looking
 - Our district is a connected place
10. The long term economic aim is "to improve employment opportunities for all by supporting the development and growth of a more sustainable local economy and better connected area."
11. On pages 26 and 27 the document sets out the indicators against which progress will be measured including the creation of 54,400 (broken down as 39,426 employee jobs, 6,170 self-employed jobs and 8,808 agricultural jobs) and 7,690 registered businesses.
12. The Community Plan is accompanied by an Action Plan setting out the steps that the Council will pursue with/through its partners towards achieving the above noted outcomes. Those relating to the economy are set out on Pages 23 to 31 inclusive.

Draft Strategy Comments

13. As noted at paragraph 6 above RG1 concentrates on the supply of employment land for attracting local and inward investment. It highlights the need for there to be an adequate and continuous supply within LDPs and for such land to be protected. Furthermore it places the onus on the Planning

Authority to assess the quality and viability of sites zoned and to monitor the take-up and loss of employment land.

14. The draft Strategy, Page 42, notes that its role is to provide the framework within which businesses can operate including an indication of the scale of new industry and business land to be provided through the Local Policies Plan. Having conducted an assessment of future employment needs the Council has estimated 4,875 jobs will be created by 2030 necessitating the zoning of 90 hectares of land. The Council considers this to be a generous supply given the majority of these jobs are expected to be within the services sector.
15. In terms of uptake it is noted that where accessible serviced sites have been provided this has been high. There will be a need to provide alternative land to replace that which has been affected by flooding.
16. In alignment with the draft Strategy, draft Strategic Policy SP04 Strategic Allocation of Land for Industry and Business states the Plan Strategy “*will make allocations of circa 90 hectares of business and to help facilitate the provision of new jobs.*” This will include new and carried forward undeveloped zoned industry and business land. There will be a strategy of protecting existing industry and business sites.
17. Paragraph 4.1 references the RDS direction for the exploitation of hubs, key transport corridors and regional gateways and to provide for a diversified and competitive rural economy. Paragraph 4.4 notes the Council is keen to provide a responsive and flexible approach that secures, strengthens, modernises and where appropriate diversifies the economy. This will be achieved through the delivery of zoned land for industry and business and the retention and reuse of land and buildings which are well located and suited to such purposes. There will also be provision for industry and business proposals in the countryside.
18. From its perspective Invest NI would consider this to be in general conformity with the direction of the RDS and the SPPS. It might also be useful if the Council could set out any plans it might have to undertake a review of the industrial land provision to understand its suitability.

Economic Policies

19. The Council’s economic policies are set out in detail within the draft Strategy Pages 93 to 127 inclusive. From a spatial perspective those that are most relevant to our role are as follows
 - **Draft Policy IB01 : Industry and Business Development in Settlements** – Invest NI considers this policy to be in general conformity with the RDS

- **Draft Policy IB02 : Loss of Industry and Business Uses** – Invest NI considers this policy to be in general conformity with the RDS and SPPS

Further to this we would note that the gestation period for industrial land to become fully occupied is, in our experience, significantly longer than for other development uses. This should be borne in mind when considering whether there is any market interest in a site.

- **Draft Policy IB03 : Development Incompatible with Industrial and Business Uses** – Invest NI considers this policy to be in general conformity with the SPPS
- **Draft Policy IB04 : Industry and Business Development in the Countryside** - Invest NI considers this policy to be in general conformity with the RDS and SPPS
- **Draft Policy IB05 : Farm Diversification** - Invest NI considers this policy to be in general conformity with the SPPS.

20. In terms of the draft Strategy’s economic elements Invest NI considers the proposals to be in general conformity with the Council’s Community Plan, the RDS and/or the SPPS.

>>>>>end of submission>>>>>

**Fermanagh & Omagh Local Development Plan 2030
Preferred Options Paper
Consultation response from Invest NI – November 2016**

1. Invest NI welcomes the opportunity to comment on the Fermanagh and Omagh Preferred Options Paper, these comments follow on from those previously made by the organisation in June 2016.
2. It is important to note that Invest NI can only comment on the needs of those companies which meet its intervention criteria, these businesses will primarily be those which can drive productivity and make the greatest contribution to growing the economy.
3. The questionnaire which was published with the Preferred Options Paper covers many areas which fall outside the remit of Invest NI. This response will therefore include general comments on the options paper as a whole, augmented with specific replies to appropriate elements of the questionnaire.

General Comments

4. Invest NI notes that the Council area is somewhat unique with Northern Ireland in that c85% of businesses are classified as “micro” in that they employ less than 5 people. These are predominantly located within the agricultural, forestry and fishing sectors. Finance, insurance and ICT have been identified as growth areas.
5. The 7th Overarching Principle states that Council can require developers to bear the cost of work required to facilitate development proposals. The circumstances under which this can arise are detailed within this point. Whilst Invest NI can appreciate the application of such a “developer pays” principle in respect of private sector developments where the primary motivation might be the generation of financial benefit for the developer it would caution against its application in respect of public sector developments where wider societal benefits are the driving force rather than profit. In such cases, it could be considered that delivery for the greater economic good is community benefit in and of itself. In addition, the

imposition of such additional cost has the potential to adversely affect project deliverability.

6. Paragraph 5.18 notes that Invest NI requires additional land for its clients, this is an inaccurate representation of our position. Invest NI's current property policy operates within the sphere of market failure. The agency will only intervene in the commercial property market to buy and develop land where the private sector is not willing to do so, there is clear evidence of business demand and sufficient funding is available to enable it to do so.
7. Invest NI notes that the Council will seek to identify economic development areas including opportunities for regeneration and mixed use developments adjacent/accessible to deprived/disadvantaged areas in Enniskillen, Omagh, Fintona and Irvinestown.
8. Invest NI welcomes the carrying forward of the existing provisions of PPS 4 Planning and Economic Development.

Comments specifically related to the POP Questionnaire

The Vision and Strategic Objectives

Question 1: Do you agree with the Council's list of objectives?

The organisation notes that the Council's vision for the Plan area is underpinned by three pillars of sustainable development namely social, economic and environmental.

The Council's first economic objective is to facilitate the creation of 4,875 jobs by 2030 at suitable locations accessible to all members of the community. It would be useful for the Council to elaborate further on these jobs; for example how they envisage this target being achieved and whether they are across the aforementioned growth sectors or the economy as a whole.

Main Issue 3: Economic Development Land Allocation

Question 5: Do you agree with the Council's preferred option for the allocation of economic development land? If not, why not?

We note that the Council's preferred option to achieve balanced growth is to focus economic growth on the two main hubs of Enniskillen and Omagh whilst sustaining the rural communities living in small towns, villages, small rural settlements and the open countryside.

We acknowledge the potential for new employment zonings that the proposed A4 & A5 road upgrades may release, once delivered.

Invest NI is supportive of the Council's aim to achieve balanced growth across the district and to provide opportunities for privately led investment in business and industry.

Main Issue 4: Development in the Countryside; Sustaining Rural communities.

Question 6: Do you agree with the Council's preferred option for sustaining rural communities?

Yes [X]

Main Issue 5: Economic Development - Addressing Deprivation/Regeneration in the Urban Areas.

Question 7: Do you agree with the Council's preferred option for addressing deprivation/regeneration in urban areas?

Invest NI highlights the importance of providing a choice and variety of sites across the Plan area to respond to the changing nature of business and industry. It notes that the Council proposes to zone c90 hectares of new industrial land with the largest share being allocated across the two main towns of Enniskillen and Omagh.

In addition to zoning land we note that the Council proposes to identify vacant or under used land in disadvantaged areas within the two main towns.

It would be useful if the Council could set out a definition within the Plan for the terms "vacant" and "under used". Invest NI would not consider its land within the Plan area to be either vacant or under used.

Main Issue 6: Economic Development: Addressing Deprivation/Regeneration in the Rural Area.

Question 8: Do you agree with the Councils preferred option for addressing deprivation/regeneration in rural areas?

Invest NI highlights the importance of providing a choice and variety of sites across the Plan area to respond to the changing nature of business and industry. It notes that the Council proposes to zone c90 hectares of

new industrial land with the largest share being allocated across the two main towns of Enniskillen and Omagh.

In addition to zoning land we note that the Council proposes to identify vacant or under used land in disadvantaged areas within the two main towns.

It would be useful if the Council could set out a definition within the Plan for the terms “vacant” and “under used”. Invest NI would not consider its land within the Plan area to be either vacant or under used.

Main Issue 9: Integrated Renewable Energy and Passive Solar Design

Question 11: Do you agree with the Council’s preferred option for addressing Integrated Renewable Energy and Passive Solar Design in new Development?

Invest NI notes that the preferred option suggests that a requirement to integrate renewable energy and passive solar design will be placed on developers “e.g. public sector”. Paragraph 9.16 states “there is no requirement that developers/developments incorporate such measures into their schemes” whilst paragraph 9.17 claims that the policy seeks “to make it a requirement that integrated renewable technology and/or PSD is incorporated into any public sector development”.

Invest NI requests that this matter is clarified, particularly in the regard of what the Council would envisage as public sector development. It would reiterate its concerns about the potential that in developments where wider societal benefits are the driving force rather than profit, the imposition of additional capital cost has the potential to adversely affect project deliverability.

Question 11b: Do you agree with the suggested thresholds of 1 hectare or greater in size or 1000m² or greater? Should they be higher or lower and if so, what would be your reason?

Invest NI requests that this matter is clarified, particularly in the regard of the nature of developments to which this threshold would apply. For example, industrial development whether privately or publicly funded would conceivably breach this threshold for even the most modest of schemes. While the economic and environmental benefits are well documented, it would be beneficial to consider separate thresholds for different types of developments, perhaps based on typical built footprint, to prevent imposition of an over-onerous constraint.

Main Issue 13: Supporting Good Design and Place Making.

Question 16: Do you agree with the Council's preferred option for supporting good design and place-making?

Yes [X]

Carried Forward Planning Policies

Question 23: Do you think the existing town centre boundary in Omagh should be retained or amended? If amended, how so?

Amended [X]

Areas of the town centre now excluded from development by PPS 15 should be provided for elsewhere

Question 27: What approach should be taken to opportunity/vacant sites in Enniskillen and Omagh town centres?

Invest NI supports the re-use of buildings within settlements for modern business purposes and notes that the employment catered for can also bring new footfall and add vibrancy to the retail and hospitality businesses in town centres.

Issued on behalf of Invest Northern Ireland



Fermanagh & Omagh Draft Plan Strategy Representations Form

Hard Copies of the Draft Plan Strategy are available for inspection during normal opening hours at the council's principal offices. The documents, electronic copies of this form, and our 'Guidance for Making Responses to the Plan Strategy' may be viewed at: <https://www.fermanaghomagh.com/>

How to respond

You can make representations about the Draft Plan Strategy by completing this survey form, or if you prefer, you can fill out this form online.

For further assistance contact: developmentplan@fermanaghomagh.com or Tel: 0300 303 1777; All representations must be received by 21st December 2018 at 12:00 noon.

SECTION 1. Contact Details

Individual Organisation Agent (complete with your client's details first)

First Name

Last Name

Job Title (Where relevant)

Organisation (Where relevant)

Address

Bedford Square
Bedford Street
Belfast

Postcode

Telephone Number

Email Address

If you are an Agent, acting on behalf of an Individual or Organisation, please provide your contact details below. (Please note you will be the main contact for future correspondence).

First Name

Last Name

Job Title (Where relevant)

Organisation (Where relevant)

Address

Postcode

Telephone Number

Email Address

SECTION 2. Representation

What is your view on the Draft Plan Strategy?

Sound

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below.

Please see attached submission document

F&O LDP – Invest NI Draft Plan Strategy Response December 2018

And the supporting document

F&O LDP - Invest NI POP Response November 2016

We note a possible omission on page 195 where the word Objectives appears to be missing in the table after “Relevant SA”

(Continue on a separate sheet if necessary)

OR

Unsound

If you consider the Plan Strategy to be **unsound**, please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6.

Soundness Test No:

- P1 Has the Draft Plan Strategy 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 Draft Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?**
- P4 Did the council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?**
- 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?**
- CE1 Does the Plan Strategy 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 Draft Plan Strategies of neighbouring councils?**
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**
- CE3 Are there clear mechanisms for implementation and monitoring?**
- CE4 Is it reasonably flexible to enable it to deal with changing circumstances?**

Plan Component - To which part of the Draft Plan Strategy does your representation relate?

- (i) Relevant Paragraph**
- (ii) Relevant Policy**
- (iii) Proposals Map**
- (iv) Other**

Details

Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Modifications

What, if any, modifications do you think should be made to the section, policy or proposal? What specific modifications do you think should be made in order to address your representation?

(Continue on a separate sheet if necessary)

If you are seeking a change to the Draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

- Written Representations** **Oral Hearing**

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

By proceeding and submitting this representation you confirm that you have read and understand the privacy notice above and give your consent for Fermanagh and Omagh Council to hold your personal data for the purposes outlined.

Consent to Public Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Please note: Even if you opt for your details to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner/Authority they appoint to oversee the examination in public into the soundness of the plan. This will be done in accordance with the privacy statement above.

- Yes with my name and/or organisation**
- Yes, but without my identifying information**

Signature



Date

21 December 2018