Draft Methodology for a Strategic Economic Land Availability

Assessment

January 2024



Fermanagh & Omagh District Council Comhairle Ceantair Fhear Manach agus na hÓmaí

1.0 Introduction

- 1.1 On 16 March 2023 Fermanagh and Omagh District Council (FODC) adopted the Local Development Plan 2030: Plan Strategy, which is the first of two documents. The Plan Strategy sets out the Council's strategic policy direction in relation to economic development land (Industry and Business). Since then, the Council has progressed preliminary work on the second plan document, the Local Policies Plan (LPP). The LPP will set out the Council's local policies and site-specific proposals in relation to development and use of land in our district.
- 1.2 This paper outlines a draft broad methodology to be used for the Strategic Economic Land Availability Assessment (SELAA). The role of a SELAA is to provide background evidence on the potential suitability, availability and deliverability of land for industry and business and the choices available for delivering sites.
- 1.3 The SELAA is an important evidence source to inform plan-making but does not in itself determine whether a site should be zoned for industry or business. The Council's SELAA is a study of the availability, suitability and deliverability of land to meet the identified need for industry and business over the plan period (to 2030). The SELAA does not suggest that the Council will grant planning permission for industry and business even if a site is considered suitable, available and deliverable.
- 1.4 Should the Council's assessment of the site indicate that it has potential for development, this will not amount to confirmation that the site will be allocated (zoned) in the LPP or that planning permission for a particular use or development will be granted. No part of this process should be read as generating an expectation as to how the Council will determine any individual application for planning permission or progress any site through the plan making system.
- 1.5 The SELAA will produce a long list of industry and business sites that have been identified or put forward for development and provide an assessment of the potential of those sites for development. Once completed, it will form part of the evidence base for the Council's LPP and will be used to help inform judgements on the allocation of land for industry and business.

2.0 Planning Policy Context

a) Regional Development Strategy 2035 (RDS)

2.1 The RDS 2035 provides a framework for strong sustainable economic growth across the region and recognises that a growing regional economy needs a co-ordinated approach to the provision of services, jobs and infrastructure. It provides regional guidance to ensure an adequate supply of land to facilitate sustainable economic growth (RG 1). Land should be accessible and located to make the best use of available services, for example water and sewerage

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infrastructure, whilst avoiding, where possible, areas at risk of flooding from rivers, the sea or surface water run-off.

2.2 The quality and viability of sites zoned for economic development uses should be assessed against an Employment Land Evaluation Framework which will enable planning authorities to identify robust and defensible portfolios of both strategic and locally important employment sites in their development plans. This means protecting zoned land in development plans and, in order to capitalise on the development opportunity provided by a concentration of people, goods, available infrastructure and business, promoting economic development opportunities in the Hubs (SFG11). It also recognises the importance of sustaining rural communities by facilitating rural industries, business and enterprises in appropriate locations. This means not only businesses connected to farming, forestry and fishing but other industries such as tourism and renewable energy which can provide further jobs and opportunities in rural areas provided that they integrate appropriately within a settlement or rural landscape.

b) Strategic Planning Policy Statement for Northern Ireland (SPPS)

- 2.3 The SPPS aims to underpin the regional guidance in the RDS by growing a sustainable economy and investing in the future.
- 2.4 The SPPS outlines that planning authorities should take a positive approach to appropriate economic development proposals, and proactively support and enable growth generating activities. Large scale investment proposals with job creation potential should be given particular priority. Planning authorities should also recognise and encourage proposals which could make an important contribution to sustainable economic growth when formulating new plans and taking decisions.
- 2.5 The SPPS also sets out a number of factors below that should be taken into account in assessing potential sites and proposals for development. When allocating land for economic development uses, the SPPS stresses the need to ensure there is an ample supply of suitable land available to meeting economic development needs within the plan area over the plan period.

LDPs should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity.

Other factors to be taken into account:

- Accessibility by all members of the community
- Connectivity with the transportation system (particularly public transport)
- The availability of adequate infrastructure
- The specialised needs of specific economic activities
- Potential environmental impacts

- Compatibility with nearby uses including the operational requirements of existing or approved economic development.
- 2.6 The SPPS is also very clear about the importance and advantages of identifying those lands which have been previously developed, as well as identifying opportunities for mixed use development.

c) Planning Policy Statement 4 – Planning and Economic Development

2.7 PPS 4 Planning and Economic Development, no longer applies when making decisions on individual planning applications following the adoption of the Plan Strategy. It does however contain helpful guidance in relation to the preparation of development plans and bringing forward plan proposals which are material to this process and has been taken into consideration in the preparation of this document.

d) Development Plan Practice Note 8 - The Local Policies Plan

- 2.8 Development Plan Practice Note 8 advises the Local Policies Plan should be designed to guide Planning Officers and relevant uses through the key requirements for the preparation of the Local Policies Plan and deals primarily with procedures as well as good practice.
- 2.9 The LPP should be both realistic and deliverable whilst taking into account the resources available and any potential constraints which may arise during the plan period.
- 2.10 Section 11 deals with economic development, industry and commerce. It states that 'in preparing the LPP, a council may build upon and update the work already undertaken for the preparation of the PS in order to determine the most appropriate sites for economic development, industry and commerce'.
- 2.11 The amount of land and location of sites should be consistent with the policy approach set out in the PS, and in particular reflect a council's growth strategy and the role and function of settlements as set out in the settlement hierarchy for the council area. The LPP should zone sufficient land for economic development and offer a range and choice of sites to provide for different economic needs. In doing so, a council should also take account of issues such as the connectivity and accessibility to transportation systems and availability of adequate infrastructure.
- 2.12 Where possible, the LPP should identify previously developed land within settlements for potential economic development use in order to promote sustainable development. The LPP may also identify opportunities for mixed use development as well as specify the type of economic development use which would be acceptable on a specific site. A council should also set out key site requirements to tailor development for a specific site. These may relate to necessary infrastructure such as roads, accessibility, water supply, sewage and drainage as well as design, layout and landscaping requirements.

d) FODC Local Development Plan - Plan Strategy 2030

2.13 The FODC Local Development Plan will comprise two documents, the Plan Strategy and the Local Policies Plan. These will provide the planning policy framework and land use proposals which will guide development decisions in the District up to 2030. The Local Development Plan is prepared within the context of the District's Community Plan and the Council's Corporate Plan to ensure there is a shared vision for the area and communities, while delivering the spatial aspects of the District's Community Plan. It also takes account of the Council's other key plans and strategies.

Strategic Policy SP04 – Strategic Allocation of Land for Industry and Business

2.14 The Plan Strategy will make allocations of circa 90 hectares of industry and business land within the main and local towns in support of business and industry and to help facilitate the provision of new jobs (based on an average of 1 job per 50m² on newer industrial estates¹). This will include new and carried forward undeveloped zoned industry and business land. The total allocation of industry and business land will be distributed between the two main towns and five local towns as follows:

Settlement	Area (hectares)
Enniskillen	30
Omagh	42
Carrickmore	2.22
Dromore	1.96
Fintona	2.46
Irvinestown	4.88
Lisnaskea	6.30
Total	90

Table 1: Strategic Allocation of Land for Industry and Business

- 2.15 In the context of industrial development, the relevant planning policies are set out within Section 4 Economy.
- 2.16 Within towns, the policy approach is to locate new industry in zoned areas. Existing industrial areas, including vacant buildings and brownfield sites (as defined on p.194 of the Plan Strategy) which could accommodate new industry through new development, redevelopment or change of use is also encouraged. Where industrial uses, by their nature, result in the creation of air or noise pollution, they will only be acceptable where the carrying out of any

¹ Employment, Industry and Business Fer-Om - Final June 20 (fermanaghomagh.com)

proposed industrial process is compatible with adjacent uses. The relevant policy is;

Policy IB01 - Industry and Business Development in Settlements

The Council will support industry and business uses in settlements as follows: (a) Towns: Development proposals for industry will be permitted:

i) on land zoned for such purposes in the Local development plan; or

ii) within an existing industrial area where it is compatible with adjacent and nearby uses and is of a scale, nature and form in keeping with the industrial area.

e) FODC 209 – Employment, Industry and Business Topic Paper Updated June 2020

This paper provides:

- (i) the regional policy context for formulating Local Development Plan policies for economic development;
- (ii) an overview of existing provision and take up of zoned economic development land in the Fermanagh and Omagh Area Plans;
- (iii) a socio-economic profile of the Fermanagh and Omagh District; and
- (iv) an assessment of the number of new jobs required and how this can be translated into future economic land requirements.

3.0 Land use included and approach

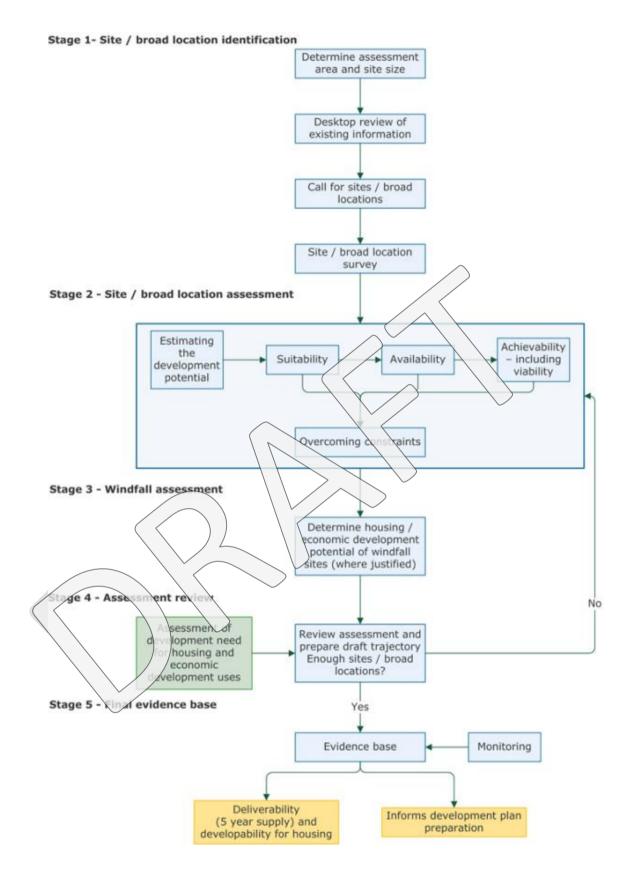
- 3.1 The relevant land use for this assessment is industry and business (economic). The RDS advocates provision of an adequate supply of land to facilitate sustainable economic growth and regional guidance promotes provision of a range and choice of sites to provide for different economic needs. The identified sites should be both realistic and deliverable, whilst taking into account the resources available and any potential constraints which may arise during the plan period i.e. up to 2030.
- 3.2 Industry and business uses refer to those currently defined in Part B 'Industrial and Business Uses' of the Planning (Use Classes) Order (Northern Ireland) 2015. "Business" includes: offices, call centres, and research and development. "Industry" includes: light industrial, general industrial, and storage and distribution uses
 - Industry and Business uses comprise business (Class B1)
 - Light Industrial (Class B2)
 - General Industrial (Class B3)
 - Storage or distribution (Class B4)

4.0 Methodology

4.1 This draft methodology has been developed to assist with the identification and assessment of lands which are suitable, available and deliverable for industry and business. This takes account of the relevant regional and local strategies and policies outlined in Section 2, including the RDS, SPPS, PPS 4 (superseded upon adoption of the Plan Strategy) and the relevant policies within the Plan Strategy. The guidance produced in the UK for Housing and Economic Land Availability Assessment HELAA², has informed this methodology.

Stages of the Strategic Economic Land Availability Assessment.

²https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-5-final-evidence-base





Stage 1: Identification of sites/broad locations to be assessed.

- 4.2 The extent of the assessment area is Fermanagh and Omagh District Council area. The PS indicates that sites will be zoned for industry and business in the main and local towns.
- 4.3 The purpose of this stage is a desktop review, to identify as wide a range of sites and as broad a spectrum of locations for development as possible. A 'Call for Sites process will be undertaken to provide the public with an opportunity to promote sites for development and submit information about parcels of land that could potentially be taken forward within the LPP as zoned economic development land. The Council will not simply rely on submissions from the Call for Sites consultation exercise alone.
- 4.4 A criteria-based approach to selecting sites will be undertaken. The selection criteria will take account of regional and local strategies and policies as outlined in section 2.
- 4.5 It is important, as part of the desktop review, to have a full understanding of both the range and extent of constraints across each of the sites under consideration.
- 4.6 The sites to be assessed should be taken from the following sources;
 - Sites identified through the call for sites exercise.
 - Sites upon which site specific representation has been received which have been put forward previously during the plan process (POP stage) for industry and business.
 - Sites zoned for industry and business under the Omagh area Plan 1987 – 2002 and Fermanagh Area Plan 2007.
 - Sites that have industry and business planning commitments (extant or ongoing).
 - Sites which have an industry and business planning history of a refusal or withdrawn in the last 12 months prior to the assessment.
 - Sites with lapsed industry and business permissions.
 - Search for development management pre application discussions (industry and business) made within the last twelve months prior to the assessment. It is noted that the PAD process is confidential so these applicants will be asked whether they wish their sites to be considered as part of the LPP process.

Stage 1a – Estimating development potential

4.7 The Plan Strategy states that it will make allocations of circa 90 hectares of industry and business land within the main and local towns in support of business and industry and to help facilitate the provision of new jobs.

The Plan Strategy does not provide any advice on how the development potential of a site will be calculated. However, policy DE02 sets out that the Council will support those proposals 'which demonstrate high quality in terms of siting, layout, orientation and density. The Council will make a judgement on the development potential of each site during the assessment process in light of the evidence available.

Stage 2: Assess suitability, availability/deliverability

- 4.8 This stage will involve a review of all sites against the selection criteria (outlined below) to enable an identification of sites and locations that are most <u>suitable</u> for development within the main and local towns.
- 4.9 It is anticipated that there will be a number of sites which, when taking into account planning policy, site constraints and the selection criteria, will not be suitable for development.
- 4.10 In addition to assessing suitability, there will be a need to assess the availability and deliverability of sites.
- 4.11 The assessment will enable an identification of sites and locations that are most suitable for development.
- 4.12 **Suitability of sites:** A site or location can be considered suitable if it will provide an appropriate location for industry or business when considered against relevant opportunities, constraints and the potential for constraints to be mitigated or addressed. An assessment of whether a site or location is considered suitable will be informed by the following criteria;
 - Site location brownfield sites including vacant buildings and sites.
 - Planning policy.
 - Accessibility analysis.
 - Connectivity including proximity to key transport corridors.
 - Flooding and drainage.
 - Waste water treatment and network capacity.
 - Site conditions.
 - Compatibility with adjoining or nearby land uses.
 - Specialised needs or operational requirements of end users.
 - Site topography; e.g. potential constraints to development/impact on townscape arising from topography.
 - Sites contribution to the Council's Climate Action and Place Shaping ambitions.
 - Landscape Designations.
 - Natural and Historic Heritage Designations.

4.13 **Availability of sites:** A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

4.14 **Deliverability of sites:**

The deliverability of a site calls for an exercise of evaluative judgement taking into account all of the available evidence. For the purposes of the plan, a site will be considered to be deliverable if there is a realistic prospect that the proposed development will be delivered on the site within a particular timeframe, for instance within the plan period.

Stage 3: Assessment Review

4.15 The conclusions and assessments across all the sites will be reviewed and compared with the overall industry and business need.

Stage 4: Final Evidence Base

4.16 The evidence base i.e. maps and findings of the assessments will be collated and will set out the results of the assessment in terms of suitability, availability and deliverability of each site for industry and business.