



Draft Methodology for a Strategic Housing Land Availability Assessment

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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: Plan Strategy, which is the first of two Development Plan documents. The Plan Strategy sets out the Council's strategic policy direction in relation to housing. 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 Housing Land Availability Assessment (SHLAA). The role of a SHLAA is to provide background evidence on the potential suitability, availability and deliverability of land for housing and the choices available for delivering sites.
- 1.3 The SHLAA is an important evidence source to inform plan making but does not in itself determine whether a site should be zoned for housing. The Council's SHLAA is a study of the availability, suitability and deliverability of land to meet the identified need for housing over the plan period (to 2030) and beyond.
- 1.4 The SHLAA does not suggest that the Council would grant planning permission for housing even if a site is considered suitable, available and deliverable. 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 SHLAA will produce a long list of housing 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 housing.

2.0 Planning Policy Context

a) Regional Development Strategy 2035 (RDS)

- 2.1 The RDS 2035 sets policy directions for the provision of housing that aim to deliver development in a more sustainable manner. This means growing population and providing additional housing in the Hubs (SFG 12) and sustaining rural communities living in smaller settlements (i.e. smaller towns and villages) and the open countryside (SFG 13). It is important to reinforce our vibrant rural communities so that they do not begin to decline at the expense of the main urban centres/hubs.

- 2.2 In accordance with this objective, the RDS, sets a regional target of 60% of new housing to be located in appropriate brownfield (as defined on p.194 of the Plan Strategy) sites within the urban footprints of settlements greater than 5,000 population (RG 8). In Fermanagh and Omagh, there are two settlements which have a population significantly greater than 5,000 – Enniskillen and Omagh.
- 2.3 The RDS identifies regional housing needs as Housing Growth Indicators (HGIs) across Northern Ireland. HGIs have been produced as a guide for the preparation of development plans. The current HGI figures which cover the period 2016 – 2030 and assigned 4,300 dwellings to FODC which establishes a housing target of 4,300 dwellings for the period 1 April 2015 to 31 March 2030.

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

- 2.4 The SPPS aims to underpin the regional guidelines in the RDS by promoting a more sustainable form of development, encouraging more housing within existing urban areas, encouraging good design and achieving balanced communities.
- 2.5 When allocating land for housing developments, the SPPS advises that LDPs should be informed by:
- The RDS Housing Growth Indicators (HGIs)
 - The RDS housing evaluation framework; which takes account of the varying capacities of settlements and will assist councils in making judgements on the allocation of housing growth
 - Allowance for existing housing commitments i.e. dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved
 - Housing Needs Assessment (HNA) which should be devised to provide an evidence base for the allocation of land to meet specific types of housing needs such as affordable housing, social housing, supported housing or traveller accommodation
 - Urban Capacity Studies – an assessment of the potential of brownfield sites to provide housing land, the availability of infill sites and the potential to reuse existing urban buildings
 - Windfall housing i.e. housing sites from previously developed land within the urban footprint which may become available during the lifespan of the development plan
 - Application of a sequential approach and identification of suitable sites for settlement of over 5,000 population

- Housing Needs Assessment/Housing Market Analysis (HNA/HMA); provides an evidence base of land required to facilitate the right mix of housing tenures including open market and special housing needs
- Transport Assessments; these may be required for certain sites for residential use to achieve integration with public transport and other alternatives to the car.

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

- 2.6 Development Plan Practice Note 8 – The Local Policies Plan is designed to guide planning officers and relevant users through the key requirements for the preparation of the Local Policies Plan and deals primarily with procedures as well as good practice.
- 2.7 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.
- 2.8 Section 13 deals with Housing in Settlements. Paragraph 13.2 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 housing development. 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.’
- 2.9 SA baseline information as well as the appraisal of the LPP policies and proposals for housing growth should help a council to determine the most appropriate options whilst taking into account other related policy considerations in the local development plan. This should help to ensure an integrated and sustainable approach towards the provision of housing in settlements whilst taking account of the other plan objectives, for example, economic development, infrastructure and transport and the provision of public services.

d) Planning Policy Statement 12: Housing In Settlements

- 2.10 This PPS states that it is a material planning consideration in preparing development plans and dealing with individual planning applications.
- 2.11 The PPS gives guidance on various key stages and approaches that should be considered as part of the LDP process, including; the process for allocating housing land, urban capacity studies, managing the release of Housing Sites.

e) **FODC Local Development Plan (LDP) Plan Strategy (PS) – Relevant policies.**

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

Strategic Policy SP03 – Strategic Allocation and Management of Housing Supply in our Settlements

2.13 The Plan Strategy will make provision for at least 2,608 new homes within our settlements in the period 2019-2030. The indicative housing need for each settlement over the plan period is set out in the PS, Table 1 gives a summary of this.

Table 1: Strategic Allocation of Land for Housing

		Housing Need (2019-2030)
Status	Settlement	Dwellings
Main Towns	Enniskillen	693
	Omagh	939
	Total	1632
Local Towns	Carrickmore	15
	Dromore	61
	Fintona	58
	Irvinestown	70
	Lisnaskea	117
	Total	321
Villages and Small Settlements	Total	655

a) Main and Local Towns

To manage the housing supply over the plan period, zoned housing land within the main towns and local towns will be released in two phases.

A criteria-based approach to selecting sites for each phase will be undertaken. The selection criteria will take account of several factors including; Accessibility Analysis; the prioritisation of brownfield land within the Urban Footprint; the ability to deliver affordable housing where a need exists; topography; compatibility with other land uses, flooding and other constraints to development including waste water network and treatment capacity. Sites will only be allocated where it can be shown that they can accommodate at least 10 dwellings.

The Phase 1 and Phase 2 sites will be identified within the Local Policies Plan along with the key site requirements to guide their development. Until such time that the Local Policies Plan is adopted land will be zoned for housing as indicated within the Fermanagh Area Plan and the Omagh Area Plan.

Phase 1 Sites

Phase 1 sites will be identified to meet any remaining housing need over the plan period once committed housing sites with extant planning permissions or sites which are under development have been taken into account.

Phase 2 Sites

Phase 2 Sites will be identified for allocation beyond the plan period (i.e. after 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 to meet housing need within the plan period. The exact criteria and mechanism for how these sites could be released will be outlined within the Local Policies Plan.

(b) Villages and Small Settlements

Within the Villages and Small Settlements, Housing Policy Areas (HPAs) may be identified in the LPP. These will indicate where most new housing within these settlements will be located. The HPAs will be identified following a detailed analysis and character appraisal of the settlement and will focus on providing housing in locations where it is most likely to integrate into the character of the settlement. The HPAs will also be commensurate with the scale of, and the future housing need of, the individual settlement and after committed housing sites with extant planning permissions or sites which are under development have been taken into account.

(f) FODC 309 Updated Housing Paper including Housing Land Studies (November 2019).

- 2.14 This paper provides various updates (to April 2019) and further analysis of housing development and supply within the District. This includes an assessment of the indicative Housing Requirement for every settlement for the remainder of the plan period 2030. The paper includes an assessment of existing commitments, completions and an overview of the Housing Land Studies and conclusions. The Housing Land Studies incorporates the Housing

Monitor April 2019, Housing Audit April 2019, Urban Capacity Study April 2019 and a Windfall Assessment April 2019.

(g) Annual Housing Monitor Report 2021-23

- 2.15 The [Housing Monitor report for 2021 - 2023](#) was conducted through desktop analysis. This report has determined the remaining indicative Housing Need for the plan period 2019-2030. A list of commitments within each settlement across the district has also been published.

3.0 Land use included and approach

- 3.1 The relevant land use for this assessment is residential/housing. This will include both private and affordable residential/housing. When identifying housing sites there should be an adequate and available supply of quality housing to meet the needs of everyone. 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 and beyond.

4.0 Methodology

- 4.1 This draft methodology has been developed to assist with the identification and assessment of lands that are suitable, available and deliverable for housing. This takes account of the relevant regional and local strategies and policies outlined in section 2, including the RDS, SPPS, PPS 12 and the relevant policies within the Plan Strategy. The guidance produced in the UK for Housing and Economic Land Availability Assessment HELAA¹ has informed this methodology.

¹<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-5-final-evidence-base>

Stages of the Strategic Housing Land Availability Assessment.

Stage 1 - Site / broad location identification

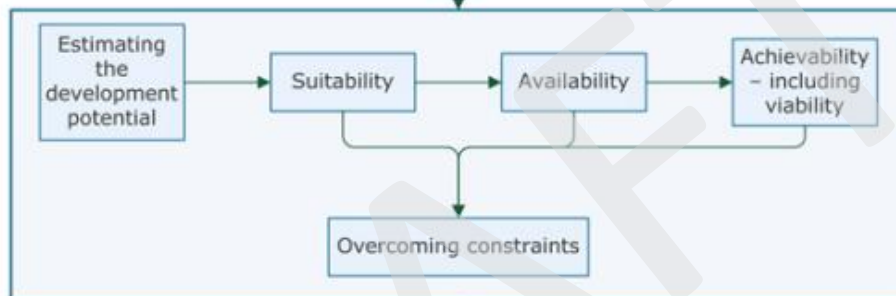
Determine assessment area and site size

Desktop review of existing information

Call for sites / broad locations

Site / broad location survey

Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment

Determine housing / economic development potential of windfall sites (where justified)

Stage 4 - Assessment review

Assessment of development need for housing and economic development uses

Review assessment and prepare draft trajectory
Enough sites / broad locations?

Stage 5 - Final evidence base

Yes

Evidence base

Monitoring

Deliverability (5 year supply) and developability for housing

Informs development plan preparation

No

Figure1:Methodology Flowchart - Source: [land-availability.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/publishing/asset/publishing-service/documents/02/attach/land-availability.pdf)

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 housing in the main and local towns. It also advises that within the Villages and Small Settlements, Housing Policy Areas (HPAs) may be identified in the LPP.
- 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 sites which could be taken forward within the LPP as zoned housing land. The Council will not simply rely on submissions from the Call for Sites process alone.
- 4.4 A criteria-based approach to selecting sites for each phase will be undertaken. The selection criteria will take account of several factors including those referenced in the Plan Strategy under SP03; Accessibility Analysis; the prioritisation of brownfield land within the Urban Footprint; the ability to deliver affordable housing where a need exists; topography; compatibility with other land uses, flooding and other constraints to development including waste water network and treatment capacity. Sites will only be allocated where it can be shown that they can accommodate at least 10 dwellings.
- 4.5 The criteria-based approach to selecting sites will also take account of regional and local strategies and policies as outlined in Section 2.
- 4.6 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.
- 4.7 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 residential
 - Sites zoned for housing under the Omagh area Plan 1987 – 2002 and Fermanagh Area Plan 2007.
 - Sites that have planning commitments (extant or ongoing) for housing.
 - Sites which have a residential planning history of a refusal or withdrawn in the last twelve months prior to the assessment.
 - Sites with lapsed residential permissions which have been identified through the Housing Monitoring (HM) assessment.
 - Search for development management pre-application discussions (housing development) made within the last 12 months prior to the assessment. (NB 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

- 4.8 The Plan Strategy does not prescribe housing densities within policy. However, policy DE02 sets out that the Council will support those proposals 'which demonstrate high quality in terms of siting, layout, orientation and density. Policy HOU05 requires development not to result in unacceptable damage to the local character and also a requirement to provide a mix of housing to meet the needs of everyone, including a range of dwelling types, sizes and tenures.
- 4.9 The policy clarification sets out that within established residential areas it is imperative to ensure that the proposed density of new housing development, together with its form, scale, massing and layout will respect local character and environmental quality as well as safeguarding the amenity of existing residents.
- 4.10 'Creating Places' which provides regional guidance is also a material consideration (www.infrastructure-ni.gov.uk). The Council will make a judgment on the development potential of each site, based on the evidence available and the characteristics of each site and their surroundings.

Stage 2: Assess suitability, availability/deliverability

- 4.11 This stage will involve a review of all sites against the broad selection criteria (outlined below, which are consistent with SP03 – Strategic Allocation and Management of Housing Supply in our Settlements) to enable an identification of sites and locations that are most suitable for development.
- 4.12 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.
- 4.13 In addition to assessing suitability, there will be a need to assess the availability and deliverability of sites.
- 4.14 The assessment will enable an identification of sites and locations which are most suitable for development.
- 4.15 Suitability of sites;** A site or location can be considered suitable if it will provide an appropriate location for housing development 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 which is consistent with policy SP03 in the Plan Strategy;
- Within Main and Local towns sites will only be allocated where it can be shown that they can accommodate at least 10 dwellings.
 - Prioritisation of brownfield within the urban footprint,

- Compatibility with existing land uses.
- Suitable site topography – e.g. potential constraints to development/impact on townscape arising from topography.
- Planning policy.
- Accessibility analysis and connectivity.
- Flooding.
- Waste water treatment and network capacity.
- Ability to deliver affordable housing where a need exists.
- A site's contribution to the Council's Climate Action and Place Making ambitions.
- Landscape designations.
- Natural and Historic Heritage designations.
- Site conditions or contamination.

- 4.16 Policy SP03 sets out the criteria-based approach to be adopted to the identification of residential housing sites in the main and local towns. It explains that prioritisation will be given to brownfield land within the urban footprint. It also explains that the ability to deliver affordable housing where a need exists will be taken into account. The Council will pay particular regard to these matters in its assessment.
- 4.17 The Plan Strategy recognises throughout the need to mitigate and adapt to climate change. Positive Place Shaping has a role to play in this endeavour. The Council will pay particular regard to these matters in its assessment.
- 4.18 **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.
- 4.19 **Deliverability of sites:** A deliverable site is one where there is a reasonable prospect that housing will be developed on the site at a particular point in time. It is a professional judgement about the economic viability of a site and whether it will be completed within the plan period i.e. 2030. 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.

NOTE: There is a high number of commitments (extant or ongoing permissions) within the District, many of which have not been built out. Therefore, even if a site has planning permission, clear evidence in relation to the realistic prospect that housing will be delivered should be submitted. This will be particularly so where a site has a record of under delivery. Where a site has been the subject of a permission or zoning but development has not been commenced or has taken place slower than anticipated, then a clear explanation of this should be given.

Stage 3: Windfall Assessment

4.20 Windfall sites are housing sites that were neither zoned nor anticipated during the formulation of the development plan, but which have become available during the lifetime of the plan.

4.21 The Strategic Planning Policy Statement (SPPS) discusses Windfall in the context of the Process for Allocating Housing Land at para 6.139 and states:

“Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period...it is necessary to make full allowance for this when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land...Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid under-estimation of windfalls”.

Stage 4: Assessment Review

4.22 The conclusions and assessments across all the sites will be reviewed and compared with the overall housing need.

Stage 5: Final Evidence Base

4.23 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 housing.