

# Local Development Plan 2030 Preferred Options Paper

## Public Consultation Report – February 2017



**Purpose:** To inform the Council of the findings of the Preferred Options Paper public consultation exercise carried out with Statutory Consultation Bodies, Section 75 Groups and members of the public.

**Content:** The paper provides a summary of:

- i. The key findings of the public consultation with statutory consultation bodies;
- ii. Representations received from members of the public, including questionnaires; and
- iii. The key findings through public workshops and meetings with under-represented groups.

## **1.0 Introduction**

- 1.1 The purpose of this paper is to inform Council of the responses made to the public consultation exercise which commenced on 3<sup>rd</sup> October 2016 and ended on 28<sup>th</sup> November 2016. The exercise was carried out jointly with Community Plan who were consulting on their draft Community Plan. This was considered appropriate in light of the statutory link between the Community and the Local Development Plan (LDP) and the requirement for the LDP to take account of the Community Plan.
- 1.2 In the four-week period prior to the consultation launch date, pre-consultation was undertaken via 'pop up shops' at a range of public venues, a poster and leaflet campaign, distribution of four newsletters at a range of venues and via an email information drop. These engagement methods were wide ranging in order to help raise awareness of the two documents, and to encourage participants to actively engage in the consultation process and make their views heard through either attending a series of 13 public workshops or responding online, or via email or post.
- 1.3 Participation during the engagement process was good although it was noted that the level of attendance at the public workshops varied greatly. In total, 1,455 people engaged in the public consultation process, of which 893 submitted a representation within the consultation period. This can be broken down as follows:

| <b>Engagement Method</b>      | <b>Numbers</b> | <b>% of Overall participation</b> |
|-------------------------------|----------------|-----------------------------------|
| Public and S75 Workshops      | 562            | 38.6%                             |
| Online Questionnaire          | 48             | 3.3%                              |
| Postal Questionnaire          | 32             | 2.2%                              |
| Postal/Email Responses        | 798            | 54.8%                             |
| Statutory Consultee Responses | 15             | 1.0%                              |
| <b>Total</b>                  | <b>1,455</b>   | <b>100%</b>                       |

It should be noted that site specific representations e.g. requests for inclusion of land within settlement limits are not included in this report but will be held over and considered at the draft Local Policies Plan stage.

- 1.4 In accordance with the requirements of Regulation 10 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Fermanagh and Omagh District Council consulted with statutory consultees including government departments, neighbouring local planning authorities and statutory undertakers, of which 15 have responded. Their comments are summarised in more detail in Appendix 2. A detailed summary of the individual representations received from members of the public who responded to the consultation process is provided in Appendix 3. A large number of these were individually signed copies of letters relating to specific issues, primarily in relation to concerns regarding potential fracking, wind energy development, minerals development and other forms of development in the Sperrin Area of Outstanding Natural Beauty.
- 1.5 The report also summarises the key findings from the public workshop meetings and Section 75 group workshops.
- 1.6 The Preferred Options Paper was accompanied by a Sustainability Appraisal (SA) Interim Report. A summary of the comments received in regard to the SA are contained in Appendix 4.

## **2.0 Summary of Consultation Findings from Statutory Consultees**

- 2.1 The purpose of the Preferred Options Paper was to provide the public, stakeholders and interested parties the opportunity to put forward their views and influence the local development plan from the outset. To stimulate debate on a range of planning issues facing the FODC area, a number of suggested possible options or policy approaches on how to address these issues were put forward along with the Council's preferred option.
- 2.2 The representations received are considered against the vision and strategic objectives for the area; overarching principles; the spatial strategy and issues to be addressed in the LDP including sustaining our rural communities, tourism, minerals development, renewable energy and supporting good

design and place making. Comments on Carried Forward Policies and other strategic issues raised are also included. Any comments of a local nature or relevant to the Local Policies Plan, will be considered at that stage of the plan process.

- 2.3 It should be noted that the response from the Department for Infrastructure (DfI) was provided on the basis of comments from Planning along with specific comments from each of the non-planning business areas within DfI. These included: Transport Planning and Modelling Unit; Transport NI – Western Division; Public Transport Services; Rivers Agency; Water and Drainage Policy Division; and Crumlin Gaol and St. Lucia Team. As Rivers Agency did not specifically provide comment on the Preferred Options Paper itself, but rather set out what the Local Policies Plan will need to contain in respect of managing flood risk, their comments will be considered at the Local Policies Plan stage.

### **The Vision and Objectives**

- 2.4 The Preferred Options Paper set out a vision and a series of strategic objectives which were grouped under the sustainability themes of social, economic and environmental. Whilst the majority of statutory consultees responded positively to the wording of the vision, DfI Planning advised that it was not locally distinct and that it should reflect the unique characteristics of FODC. The Department for Communities' Ministerial Advisory Group (MAG) commented that it was brief and that more was required on Sustainability Transport and Active travel.
- 2.5 Most consultees were in general agreement with the objectives with only minor changes suggested in relation to specific wording. However, DfI Planning stressed the need to ensure that the objectives supported the achievement of the vision and are integrated/aligned with regional and local strategies and policies. They should also be capable of being delivered, measured and monitored. It was felt that the objective for housing had not addressed social housing need and homelessness, which were referred to in the Spatial Portrait. The Northern Ireland Housing Executive (NIHE) also felt there needed to be an acknowledgment of the need for affordable housing and provision of mixed tenures. Invest NI sought elaboration on how the target for 4,875 jobs was to be created and across which growth sectors.
- 2.6 DfI Planning also considered that an objective should be provided which references renewable energy and this was reinforced by renewable energy providers SSE Renewables, Gaelectric, ESB Wind Developments and RES Ltd who sought objectives which would include the contribution of renewable energy to meeting climate change targets as well as social and economic benefits in terms of jobs and opportunities, and delivery of local projects and recreation (through grant schemes).

- 2.7 DfI's Transport Planning and Modelling Unit advised - in reference to "Economic" objective (vi) which mentioned improving travel times - that they would not be seeking to improve journey times within settlements. Transport NI emphasised the need for Council priorities to align with the overall transport priorities for the region. Public Transport Services considered there was no evidence of prioritisation in the list of objectives or analysis of likely deliverability/costs.
- 2.8 DfI's Water and Drainage Policy Unit suggested that the principles of sustainable water should be considered in the vision and objectives. SONI supported and welcomed the strategic economic objective "(v) To accommodate investment in public utilities infrastructure and waste management". RES also considered that more amplification of the header text within the "Environment" strategic objective was needed in order to promote proactive development to tackle climate change e.g. the beneficial forms of development such as wind farms. Crumlin Road Gaol and St. Lucia Team suggested that Economic objective (viii) should include recognition of the leisure and tourism opportunities that exist in the FODC area.

### **Overarching Principles**

- 2.9 The Overarching Principles reflect the strategic direction of the LDP objectives, in line with the vision for the FODC area and the Community Plan, as well as providing a link with the strategic objectives and policies set out within the SPPS. DfI Planning has reminded the Council of the 5 core planning principles set out in the SPPS and that the LDP should align with these, particularly in regard to creating and enhancing shared space and preserving and improving the built and natural environment.
- 2.10 When referring to developer contributions, the wording should match that of the SPPS and the Council should also consider if this will apply to all development. Invest NI considers that such contributions should not apply to public sector developments where wider societal benefits are the driving force rather than profit. NIHE strongly supported the overarching principle on developer contributions adding that they should also apply to affordable housing.

### **Main Issue 1: Spatial Growth Strategy**

- 2.11 The LDP is required to contain a Spatial Strategy setting out the direction for the development and use of land for the period of the plan. The POP presented Spatial Growth Options and options for allocating housing across the settlement hierarchy and allocating economic development land. Comments on these were mixed with some consultees (e.g. Historic Environment Division) expressing agreement with the preferred option for Spatial Growth whilst others were quite negative. DfI Planning in particular expressed concern that there was insufficient distinction between Options 1 and 3. Transportation and Modelling Unit were concerned that growth outside

the towns/hubs, where there is little or no public transport services, would lead to accessibility being compromised. Option 3 did not appear to support sustainable transport. Transport NI advised that LDPs need to reflect the strategic roads programme and that appropriate consideration is given to transportation matters in the allocation of land for future development.

### **Main Issues 2 and 3: Housing and Economic Land Allocation**

- 2.12 There was also concern expressed by DfI Planning regarding the preferred option for the Housing Allocation as the proportion being allocated to the countryside appeared not to be consistent with regional policy nor addressed certain key trends within the Council area (that is, the growth of households in the countryside between 2001 and 2011). It was pointed out that policy proposals that aim to create a critical mass of population to support a level of services will raise challenges for service providers in meeting the needs of a spatially dispersed population.
- 2.13 NIHE commented that they would like to see a revised preferred option which includes 'balanced growth across the small towns, villages and small settlements.' Development in the countryside should be limited as it is not sustainable, arguing further in relation to the Housing Allocation that there should be more housing allocated to these settlements rather than to the countryside. MAG and NIEA also considered the Housing Allocation was unbalanced between the main hubs and the countryside. Gaelectric indicated that there should be more focus on the main hubs in line with the RDS, in order to allow the construction of houses close to existing services and infrastructure. SSE Renewables recommended that the spatial strategy should provide no form of moratoria on where onshore wind development can or cannot take place.
- 2.14 With regards to the allocation of economic land, DfI Planning emphasised the need to be consistent with other parts of the POP, and that the impact on environment, infrastructure and services should be adequately considered. NIHE disagreed with the preferred option arguing for a similar approach to their suggestion for the housing allocation. They also suggested that the Council consider the inclusion of simplified planning zones in Enniskillen and Omagh. In contrast, Gaelectric considered that the preferred option was a sensible approach, being weighted towards the hubs but not omitting rural areas.

### **Main Issue 4: Sustaining Rural Communities**

- 2.15 The preferred option for 'Sustaining Rural Communities' also received varied responses with the proposed designation of Rural Protection Areas (RPAs) and Special Countryside Areas (SCAs) receiving positive comments from NIEA and Invest NI but largely negative comments from the renewable energy providers, DfI Planning, MAG and NIHE. The main concern from DfI Planning and NIHE was the criteria for designating RPAs and the need to ensure that there is a robust evidence base to support them. DfI Planning questioned how

they would operate alongside the carried forward policies of PPS 21. Transport NI advised of the need to take cognisance of the standard of existing infrastructure.

- 2.16 The renewable energy providers were also concerned that the preferred option lacked an evidence base and would introduce a protectionist approach to development in the countryside, arguing that the existing policy framework (PPS 21) already makes adequate provision for new development in the countryside. Public Transport Services commented that a greater number of houses in rural areas has a cost consequence.

### **Main Issues 5 and 6: Economic Development, Industry and Commerce**

- 2.17 Options were presented separately to address deprivation/regeneration in rural and urban areas. In response to the preferred option for urban areas, DfI Planning observed that deprivation goes beyond accessibility and should include issues such as educational attainment and access to affordable quality housing. Both NIHE and HED agreed with the preferred option whilst NIEA sought a caveat to ensure that any environmental constraints are sustainably addressed.
- 2.18 In regard to the preferred option for addressing deprivation in rural areas, DfI Planning sought further clarification on the criteria that would be used for such a policy and reminded Council that options should be realistic and deliver the intended outcome. Neither NIHE nor MAG agreed with the preferred option and sought further clarification on RDAs etc. SSE Renewables endorsed the preferred option subject to their comments on Main Issue 4 and, along with Gaelectric, did not accept that SCAs should be carried forward as this would be too restrictive to wind energy development.

### **Main Issue 7: Minerals Development**

- 2.19 In the Council's preferred option, it was proposed that the current policy approach in regard to minerals development would be retained with additional controls introduced to protect sensitive landscapes such as AONBs (Areas of Constraint on Mineral Development) where proposed operations should be short term (less than 15 years) and, to identify areas of minerals safeguarding. In their comments, DfI Planning advised that it was important to demonstrate cross boundary working to demonstrate soundness. Comments received from the Department for the Economy's (DfE) Minerals and Petroleum Branch were not in favour of the preferred option. Whilst they welcomed Option 1 and the recommendation in Option 3 for safeguarding minerals in the plan area, the additional constraints proposed did not seem compatible with the SPPS. They also sought clarity on the evidence base for the proposed 15 year restriction on mineral development and that each planning application should be assessed on its own merits. The time limits appeared arbitrary and unnecessary.
- 2.20 They did not support additional constraints on mineral developments, in particular in relation to the UNESCO Geopark which they argued was not a

statutory designation and where the aim is to inform people about the sustainable use and need for natural resources, whether mined, quarried or harnessed while at the same time promoting respect for the environment and the integrity of the landscape.

- 2.21 DfE were also critical that the POP did not demonstrate sufficient knowledge or understanding of high value minerals and little information was provided on oil and gas. They commented that a distinction should be made between exploration for, and extraction of, unconventional hydrocarbons, such as shale gas, and conventional oil and gas which have different scales and methodologies and raise different sustainability issues. It was recommended that the Council further engage with DfE/GSNI. Supplementary information was provided by DfE to help better inform the Council about the types of minerals, their distribution and exploration techniques etc.

### **Main Issues 8 & 9: Renewable Energy**

- 2.22 Options were presented for an overarching policy for renewable energy and integrated renewable energy and passive solar design. Only NIHE, HED and NIEA agreed with the preferred option for renewable energy. DfI Planning commented that the strategic objectives should also reflect renewables and emphasised that the SPPS adopts a cautious approach to renewable energy development proposals within designated landscapes, rather than a presumption against such proposals. The need for a robust evidence base was reiterated, in particular, the need to demonstrate where there is no further capacity to accommodate wind energy developments in sensitive landscapes. Reference should be made to the NI Strategic Energy Framework (2010).
- 2.23 The strongest objections to the preferred option came from the renewable energy organisations, SSE Renewables, Gaelectric, RES Ltd and ESB Wind Developments. Their main concern was the proposed application of what was viewed as a 'blanket-wide' ban on new wind energy developments, on landscape and visual grounds, which was considered contrary to the SPPS, PPS 18, PPS 2 Natural Heritage and the RDS. Criticism was also made regarding the content of Position Paper 14 Landscape Character Assessment which was amplified further by SSE Renewables in their attached Appendices. The approach taken in the POP provided no potential for the individual circumstances of any particular case to be taken into account as part of policy. RES also had significant concerns with the baseline information used and the supposition that extant targets have been met. They draw attention to several different UK and NI targets which extend beyond the lifetime of the plan and would encourage the Council to consider more ambitious targets to help tackle climate change.
- 2.24 RES, in particular, would encourage the Council to adopt a more sustainable policy approach and to consider the relationship between their spatial growth strategy and energy consumption over the plan period. Along with SSE



Renewables and ESB Wind Developments, RES Ltd recommended that the LDP should embrace the advantages of Re-powering renewable energy projects (a concept supported in Scottish planning policy), support the co-location of other low carbon generation technologies, provide an enabling policy framework to assist further deployment of wind energy development and continue the policy approach set out in PPS 18.

- 2.25 In responding to the preferred option on integrated renewable energy and passive solar design, Invest NI sought clarification on the thresholds and types of developments which would be applied by the proposed policy approach, and considered that separate thresholds should apply for different types of developments. NIHE considered that the policy should apply to all developments, not just the public sector, and also sought clarification on the proposed thresholds.

### **Main Issues 10, 11, 12: Tourism**

- 2.26 The options for tourism covered an ‘overarching tourism option’, ‘operational tourism’ and ‘lakes and waterways’. DfI Planning considered that there needed to be a rethink on the ‘overarching tourism’ approach and how it read alongside the carried forward policies of PPS 16.
- 2.27 Gaelectric did not agree with the preferred option for ‘overarching tourism’ as this would introduce further landscape protections which would exclude wind energy developments. SSE Renewables and ESB Wind Developments also did not agree with the preferred option and felt that there was a need for a proper evidence base to identify the tourism zones. Tourism Conservation Zones should not be developed and instead a policy approach which recognises how recreation and tourism interests can be enhanced by appropriate development proposals should be progressed.
- 2.28 NIHE, whilst agreeing with the preferred option in principle, felt it conflicted with the proposed policy for RDAs. HED commented that careful consideration should be given to the development of tourism facilities in order to protect and conserve heritage assets and comply with the SPPS.
- 2.29 With regard to ‘operational tourism’, Gaelectric did not agree with the preferred option and considered that wind farms and tourism can coexist as demonstrated in Scotland. NIHE, although in agreement with the preferred option, considered that there may be potential conflict with the designations of RDAs, RPAs etc. NIEA supported the preferred option in principle but that the Tourism Conservation Zones, Opportunity Zones/Visitor Hubs need to be carefully chosen. Both Mid Ulster and Derry City and Strabane councils were supportive of the tourism options. DfI Planning commented that more clarity was needed for proposals beyond visitor hubs to conform to the tourism strategy.

- 2.30 In relation to 'lakes and waterways', HED agreed with the preferred option but added that account should be taken of impacts on heritage assets and their settings and shipwrecks, noting that 'Fermanagh has a huge corpus of freshwater archaeology including very many crannogs'. NIEA also supported the preferred option.

### **Main Issues 13: Supporting Good Design and Place Making**

- 2.31 NIHE, Invest NI, HED, MAG and NIEA, all supported the preferred option which aimed to take greater account of design and place making in designations such as AONBs, Conservation Areas and Areas of Townscape/Village Character. MAG offered additional points for consideration and further discussion such as the beneficial impacts of good standards of civic stewardships in areas of low employment/multi-deprivation. DfI Planning sought clarification on whether the issue had been considered within the context of the strategic objectives and overarching principles. NIHE advocated the use of the Lifetime Homes Standard, to provide housing suitable to meet the changing needs of the population, particularly the elderly.
- 2.32 Gaelectric, however, did not agree with the preferred option and instead argued that, as set out in the SPPS, the design of a development can minimise energy and water usage and CO2 emissions. They referred to wind farms and renewable energy projects which reduce CO2 emissions and that the option places further restrictions on these developments in areas such as the Sperrins, and that there was no need for supplementary design guidance for the AONB. Transport and Modelling Unit felt that an opportunity had been missed in addressing how transport can contribute to place making.

### **Carried Forward Policies**

- 2.33 Existing planning policies which are considered to be operating effectively, were set out within the POP, with the view that these would be carried forward into the new LDP Plan Strategy with minor adjustment. Any changes would not alter substantially the existing policy intent, but would better support and reflect FODC's LDP vision, objectives and overarching principles. Questions were also posed in relation to some of the policies/topics, to which most consultees responded.
- 2.34 DfI Planning advised that account should be taken of the strategic objectives and vision and to provide clarification on what assessment was undertaken of retained policies. All carried forward policies will be required to be assessed under the Sustainability Appraisal process.
- 2.35 Under Archaeology and Built Heritage, HED suggested sources of information to help identify candidate Areas of Significant Archaeological Interest (ASAI) and to inform ATCs and LLPAs. They emphasised the need for careful consideration of advertisements where they affect listed buildings and protected monuments etc. and also highlighted a number of matters as

potential policy gaps. Gaelectric's view was that the existing policies in PPS 6 and SPPS relevant to archaeology and the built heritage were working well. Mid Ulster commented that consideration should be given to linking with Beaghmore ASAI so that it extends into the FODC area.

- 2.36 NIHE welcomed the retention of PPS 21 and PPS 8 and that supplementary guidance such as Creating Places and DCANs should be retained in addition to Living Places and Building on Tradition. They suggested an amendment to the PED 7 of PPS 4 to allow for residential development on appropriate sites.
- 2.37 In relation to town centres, they suggested that vacant sites should incorporate town centre living initiatives e.g. LOTS. Invest NI considered that the town centre boundary in Omagh should be amended to exclude areas subject to flood risk and supported the re-use of buildings within settlements for modern business purposes.
- 2.38 In relation to Transportation, Transportation and Modelling Unit advised that the Sub Regional Transport Plan should be treated as the current transport proposals for the area until a new local transport study had been agreed for the area. Transport NI advised that bus routes/rail routes and general access to public transport should be reflected in the consideration of zonings within LDPs. Parking policies will be a key aspect of transport plans.

### **Other Strategic Issues**

- 2.39 SONI referred to their previous comments made in their pre-POP submission which provided information on the indicative nature and extent of future developments in the Council area. They also provided a suggested text for inclusion in the LDP which related to sustainable energy transmission and distribution infrastructure network, strengthening the Grid and the requirement of assessments to be carried out to avoid adverse environmental effects.
- 2.40 NIHE, in addition to their completed questionnaire response, provided a supplementary statement on aspects relating to housing including: - future proofing and design to minimise energy usage and CO2 emissions; protect and enhance the natural environment; high quality open space; connectivity; windfall sites and unzoned land. They also expressed disappointment at the lack of specific policies on housing issues.
- 2.41 Water and Drainage Policy Division commented that consideration should be given to the policy implications of Sustainable Water – A Long Term Water Strategy (LTWS) 2015-2040 when preparing the LDP to assist in working towards a sustainable environment.

### **3.0 Summary of Representations Received from Members of the Public**

- 3.1 There were 802 responses received from individual members of the public and stakeholders including representatives of public bodies or charities, and representatives of interest groups.
- 3.2 A number of the responses from members of the public can be grouped together and as they either follow the same or very similar format and content (and have clearly been organised as such). The discussion and summary of the main themes found in the responses are set out below and correspond with the topic headings and issues within the Preferred Options Paper (POP). Comments on Carried Forward Policies and other strategic issues raised are also included. Appendix 2 includes a more detailed summary of all of these responses.

#### **The Vision and Objectives**

- 3.3 In the main, and where commented upon, the Vision and Objectives of the POP were welcomed and supported by organisations such as Dalradian Gold Ltd and the Ulster Wildlife Trust and by some individual representations.
- 3.4 The Royal Society for the Protection of Birds (RSPB NI) however, considered the *Vision* vague and was unsure if it was appropriate to link the objectives of the Community Plan so directly with the objectives of the LDP; that the objectives do not go far enough in terms of climate change; and, that there should be a further objective to steer development to less environmentally sensitive areas. The Ulster Architectural Heritage Society (UAHS) suggested amendments to expand a number of the objectives to ensure they acknowledge the importance of heritage assets and their enhancement and protection. Inaltus (representing Fane Valley who have retail interests in Omagh) considered the vision to be underwhelming for retail in Omagh and instead promoted objectives that seek a minimum target for new retail floorspace in the town.
- 3.5 The Letterbreen and Mullaghduin Partnership (a group whose submission was supported by 296 individual letters) requested changes to the supporting text of the Vision (at para.4.4) and to seek further protection for biodiversity and, in addition, human and animal health from unconventional hydrocarbon exploration and extraction. They instead suggest a greater emphasis on energy efficiency measures. They also request minor changes to the wording of a number of the social and economic objectives.

#### **Main Issue 1: Spatial Growth Strategy**

- 3.6 A number of representatives are concerned that the Spatial Growth Strategy does not intend to continue with the Dispersed Rural Communities (DRC) policy/designations of the Fermanagh Area Plan 2007. They consider this will

disadvantage these areas (and as they would only now have a similar status to countryside). They query why some DRCs are not designated as Small Settlements. This point was included in comments from the Fermanagh Rural Communities Network, Trillick 2020 Community Development Group, and one individual response.

- 3.7 In a similar vein, comments from Broughderg Area Development Association and one individual response, note as positives the policies for development in the countryside for PPS 21 and that these should be continued although with more flexibility for non-farming rural dwellers. The Killyclogher and District Development Association and Killclogher GAA raise a concern that Killyclogher is not identified as a separate settlement to Omagh and instead should be a 'village' in its own right.
- 3.8 Very few responses expressed a comment on which option would be preferred. Two responses expressed support for the Council's preferred option 3 for spatial growth and with particular reference to the benefits for Omagh, Enniskillen and Dromore. One other response, while acknowledging broad agreement with option 3 as it ensures smaller settlements and the countryside will not be neglected, still considered it overly prescriptive in only allowing single dwellings in smaller settlements through rounding off and infill. One response suggested a new settlement between Kesh and Belleck to help alleviate housing need in rural areas and also that the boundaries of the towns and villages be extended.

### **Main Issues 2 and 3: Housing and Economic Land Allocations**

- 3.9 With regard to the Housing Allocation, three representations, whilst agreeing with the Council's preferred option 3, considered the Housing Growth Indicator (HGI) figure (of 5,190 dwellings for the plan period) as flawed and too low. They used a different assessment methodology and baseline to calculate the HGI and suggested that the HGI should be 5,878 dwellings, taking into account the build rate over the period 1998-2013. Their assessment was used to justify further sites to be included for housing allocations. One response suggested more land should be allocated for housing to curb competition and assist in reducing house prices.
- 3.10 The RSPB NI considered that FODC should be more ambitious and seek to accommodate a larger percentage of housing within the two hubs and with brownfield land prioritised. They considered this would better reflect policy within the SPPS. The UAHS considered that the allocation of 1,370 houses in the countryside (as per the preferred option) is high and linked to an understanding that historically an over allocation of single dwellings in the countryside has degraded landscape character.
- 3.11 One representation did not agree with the Council's preferred option for Economic Land Allocation as it did not promote a range of opportunities for new businesses (e.g. high quality urban environment) and instead the

emphasis of allocations was towards the A5 route. The RSPB NI did not agree with the Council's preferred option as it could result in substantial development in areas where the environment does not have capacity to accommodate further growth.

#### **Main Issue 4: Sustaining Rural Communities**

- 3.12 Dalradian Gold Ltd supported the Council's preferred option. They noted that any future proposal at Curraghinalt will result in significant employment opportunities. They also advocated a strategy for resisting housing developments in the countryside as this could potentially prejudice mineral extraction. They also queried the quality of the evidence base, namely the landscape capacity assessment. The UAHS agreed with the preferred option to concentrate on clustering rural development around existing buildings.
- 3.13 The RSPB NI opposed the Council's preferred option. They considered the exclusion of environmental assets indicated by the Rural Protection Areas would not go far enough and it would fail to protect important areas including non-designated environmental assets.

#### **Main Issues 5 & 6: Economic Development, Industry and Commence**

- 3.14 One respondent did not agree with the Council's preferred option as they considered it would focus further economic employment in existing business parks and industrial zones only, but should in fact include other options and areas. The Derrygonnelly & District Community Enterprise suggested the promotion of small businesses in rural settlements as opposed to existing designated industrial areas.
- 3.15 Dalradian Gold Ltd supported the Council's preferred option. They noted the employment and training opportunities available at present in the mining industry and associated with any future proposal at Curraghinalt. The UAHS recognised the important contribution of re-using historic properties in the retail core particularly upper floors for residential and commercial use.

#### **Main Issue 7: Minerals Development**

- 3.16 There were a substantial number of comments received in relation to this issue, both from interest groups, groups of members of the public and individuals.
- 3.17 Groups such as 'Love Leitrim', the Letterbreen and Mullaghduin Partnerships, Fermanagh Fracking Awareness Network and Belcoo Frack Free and a significant number of individual responses (600+), strongly opposed further mineral exploration or extraction within FODC and with particular reference to 'fracking' or 'unconventional hydrocarbon exploitation'. They tended to

promote a policy change which would go further than the Council's preferred option 3 by either increasing those areas where mining would be subject to further control or requesting an entire ban on fracking within all of the FODC area. Various background documents and research papers were presented in support of a ban.

- 3.18 Many responses raised concerns about the potential negative impact on human health, animal health, the wider environment and food production as a result of mining activity. Some comments also considered 'fracking' would have a knock-on negative economic impact. There were requests to reduce 'short term', as presented in both options 2 and 3, from 15 years to 5 years so as to minimise any impacts.
- 3.19 There were also a significant number of comments which referenced the Sperrin AONB and its historic, environmental and landscape quality. They were principally concerned with the impact gold mining would have on the environment of the AONB as well as negative impacts on matters such as tourism and the economy. This included the comments from Save our Sperrins (SOS).
- 3.20 Dalradian Gold Ltd opposed the Council's preferred option. They suggested the Council's evidence base is lacking and thus did not support this option. They considered that the lack of information or evidence on mineral safeguarding areas undermined the LDP process and is flawed. They provided commentary on the economic benefit of mining and considered this had not been fully recognised in any of the options. They promoted an approach where each mineral should be considered separately and when looking at the areas of constraint for mineral extraction. They do not consider the landscape character assessment is a sound evidence base. They opposed the introduction of a time limit of 15 years which they considered arbitrary and not based on evidence.
- 3.21 Although the Quarry Producers Association of Northern Ireland (QPANI) agreed with the thrust of the Council's preferred option 3, they strongly opposed any policy that would introduce a prejudicial constraint on mineral development in AONBs.
- 3.22 Quinn Industrial Holdings Limited welcomed the fact that the POP recognised the presence and the importance of the availability of high grade limestone. Generally, they welcomed the Council's preferred option 3 but raised concerns about any potential constraints for mineral extraction in certain areas or with time limits. They suggested that consideration should be given to the nature of the reserve and existing industry if identifying safeguarding mineral resource areas.
- 3.23 Dalradian Gold Ltd, QPANI, and Quinn Industrial Holdings Ltd all recommended engagement with the Geological Survey NI (GSNI) and the Minerals and Petroleum Board to establish mineral safeguarding areas.

- 3.24 The RSPB NI recognised that mineral sites have the potential to enhance biodiversity through high quality restoration. The UAHS suggested a bespoke policy for the small extraction of traditional building stone is required for the repair of traditional buildings and features.

### **Main Issues 8 & 9: Renewable Energy**

- 3.25 The Northern Ireland Renewables Industry Group (NIRIG) opposed the Council's preferred option, particularly in how it sought to limit development in sensitive areas, and such an approach would be contrary to national policy and the evidence base. They also noted that there is no reference within the POP to the national target for 40% of all electricity consumed to be generated from renewable sources. They considered there is a gap in policy when it comes to the 're-powering of renewable energy projects' and this should be looked upon favourably.
- 3.26 Canavan Associates (who have previously been involved with renewable energy projects, in particular wind energy) promoted Option 1, and therefore were not in favour of introducing stricter control to protect sensitive areas, as advanced in the Council's preferred option 2. They noted that, within the SPPS, there is already a precautionary approach to siting renewable energy in AONBs. Therefore they advocated the sensitive siting of wind farms, assessed on a case-by-case basis, to allow protection of the most sensitive landscapes while ensuring sufficient renewable energy provision. They also considered that the economic benefits and employment opportunities created by wind energy developments were not fully reflected in the POP.
- 3.27 A large number of individual and grouped responses, and responses from groups such as the West Tyrone against Wind Turbines, raised concerns about the potential impact of wind turbines and expressed strong opposition to further wind energy development. A significant number of these comments referenced the Sperrin AONB and its historic, environmental and landscape quality and were concerned with the impact of wind farms.
- 3.28 A large number of commentators who opposed 'fracking', instead suggested development of "community owned renewable energy to create sustainable jobs, profit and energy for the community".
- 3.29 The RSPB NI suggested increasing the areas considered sensitive to wind energy development and to include a number of other designated and non-designated areas. The UAHS also suggested that more sites should be added including listed buildings, conservation areas, and areas of townscape character but also acknowledged that the assessment of the impact of wind farms on heritage assets should be on a case-by-case basis.
- 3.30 One response did not agree with the Council's preferred option 3 for integrated renewable energy for new housing as this is already covered by building regulations. Dalradian Gold Ltd supported the Council's preferred



option but with a caveat that it may not be appropriate for all buildings to integrate renewable energy and passive solar design and therefore suggested that the policy should be more flexibly worded. The UHAS, while broadly supporting integrated renewable energy, noted that there were sometimes difficulties with incorporating solar panels in historic traditional buildings or historic areas.

### **Main Issues 10, 11 & 12: Tourism**

- 3.31 As noted above, many of the respondents recognised the importance of tourism, for example in the Sperrins, but did not comment with particular reference to this main issue and Council's preferred options. The UHAS suggested Omagh and Necarne Castle as particular locations to develop tourism.
- 3.32 The RSPB NI highlighted that human activity can sometimes have a negative effect on biodiversity, and this includes recreational tourism on, for example, wetland dwelling birds. They therefore promoted a strategy which steers tourism development away from sensitive locations.

### **Main Issue 13: Supporting Good Design and Place Making**

- 3.33 A number of responses requested supplementary planning guidance for development in the Sperrin AONB (Question 16b). This was most often by those who opposed mineral or wind energy development.
- 3.34 Dalradian Gold Ltd also supported the Council's preferred option. However, they did not believe that there was a need for supplementary planning guidance for the Sperrin AONB as an AONB is already subject to additional scrutiny when it comes to assessing potential impact on landscape and environmental quality.

### **Carried Forward Planning Policies**

- 3.35 A number of the respondents have requested that the Sperrins - or areas/ townlands within the Sperrins - should be designated as an Area of Significant Archaeological Interest or an Area of Archaeological Potential and to extend the existing Beaghmore Area of Significant Archaeological Interest into the FODC area. It was also suggested that a Management Plan (or similar) should be produced for the Sperrin AONB (Question 17).
- 3.36 There were particular comments in relation to paragraph 12.30 (Minerals) and thus linked to *Main Issue 7: Minerals*. A large number of those opposed to fracking stated that paragraph 12.30 was not explicit enough in relation to unconventional hydrocarbon extraction. They proposed an alternative wording along the lines of "the Council totally oppose shall gas exploration and

extraction by the process of hydraulic fracturing” and therefore would not follow the precautionary approach suggested in the SPPS.

- 3.37 Inaltus considered a 1,000 sq.m threshold for Retail Impact Assessment was arbitrary and not based on any evidence. They noted the importance of a retail capacity study to assess any changes to town centre boundaries or Primary Retail Frontages.

### **Other Strategic Issues**

- 3.38 A representation received on behalf of Trillick 2020 while not site specific, provided commentary on the decline of both Trillick and Kilskeery, and identified a number of community land use requirements and the need for additional housing, including housing for older people.

Further comments by the RSPB NI queried the procedural timing of the production of the Habitat Regulations Assessment.

A number of comments identified the lack of Broadband/internet provision and poor mobile signals in rural areas as a particular concern.

## **4.0 Summary of Findings from Questionnaires**

- 4.1 A total of 77 questionnaires were received of which 48 were submitted online and 29 were received by post from individuals and representatives of groups.
- 4.2 A number of the questionnaires addressed the same issues and were identical in terms of content. Other detailed comments were made to specific topics and not all topics were addressed in each of the questionnaires.

### **The Vision and Objectives**

- 4.3 The majority of the representations agree with the vision and strategic objectives with only minor changes suggested in relation to specific wording. Proposed amendments included reference to: rural living alternatives with specific mention of eco villages; protection of biodiversity; important landscapes and the environment, including the historic and archaeological; the protection of human health; and placing environmental considerations before economic considerations.

### **Main Issue 1: Spatial Growth Strategy**

- 4.4 The majority agreed with the Settlement Hierarchy. A number of areas were suggested as small settlements: Cavanaleck / Cran; Cashel; Boho; Killyclogher; Cooneen/Coonian; Knocks; and Arvalee at Golan Crossroads. It

was proposed that the Council adopt the One Planet Development Policy<sup>1</sup> in bringing forward an eco-village approach with a number of locations proposed.

- 4.5 The majority of those who responded agreed with the Council's preferred option for a spatial growth strategy and for development in support of rural communities. Alternative approaches suggested proposed that: the hubs focus should be on major transport corridors; limiting development in the countryside to clusters.

### **Main Issues 2 and 3: Housing and Economic Land Allocation**

- 4.6 There was general consensus for the preferred option for the allocation of housing and economic land. It was suggested that the Council should seek to grow the population in the two main towns but also along all towns lying along arterial routes. Others argued that housing allocations are required for the smaller settlements to support the local services.
- 4.7 Economic Development land should be allocated within small settlements and that there should be a generous allocation of economic land not based on formulas. Option 1 would encourage workers in the local towns to walk, cycle and car share. It was also suggested that the redevelopment of brownfield/vacant commercial sites should be prioritised over the zoning of new land.
- 4.8 Strathroy Dairies agreed with Option 2 and suggested a policy approach which enables the expansion of large scale industrial uses within settlement limits into the countryside. They suggested that in zoning land consideration should be given to neighbouring land uses to ensure they do not hinder future expansion of the existing industrial development.

### **Development in the Countryside**

#### **Main Issue 4: Sustaining Rural Communities**

- 4.9 The majority of those who responded agreed with the Council's preferred option for sustaining rural communities. Some suggested that development in the countryside should be restricted to clusters, unless agriculture occupancy conditions dictate otherwise and that policy should be reviewed to allow more than one dwelling on a farm where there is a demonstrable need. Rural living alternatives such as Cloughjordan sustainable eco villages should be promoted.
- 4.10 Any curtailment of residential development in the countryside should be balanced with providing for housing and economic development land within the villages and small settlements. Local accommodation for the elderly

<sup>1</sup> <http://www.oneplanetcouncil.org.uk/wp-content/uploads/2014/02/One-Planet-Development-TAN6.pdf>

should be provided in some local towns and villages to keep them within the community.

- 4.11 A map outlining Special Countryside Areas, Rural Protection Areas and Remaining Countryside areas was requested by a number of people so that they could consider what the preferred option 2 meant.

### **Main Issue 5 and 6: Economic Development**

- 4.12 The majority of those who responded agree with the Council's preferred option for addressing deprivation/regeneration in urban areas. Carrickmore, Greencastle, Gortin and Drumduff were identified as areas which would benefit from this approach. There was general mention of the need for regeneration and revitalisation with some specific reference to Lisnaskea, Fintona and Sixmilecross.
- 4.13 The majority of those who responded agreed with the Council's preferred option for addressing deprivation/regeneration in rural areas. It was suggested that consideration be given to encouraging sustainable, sensitively sited business start-ups in the countryside, villages and small towns. Any economic development in these rural areas should have long term benefits for local communities.
- 4.14 It was also felt that many heavy industrial enterprises within urban areas are not compatible with adjacent residential uses and consideration should be given to encouraging such development in appropriate rural areas. Specific mention was made of sensitive and sustainable forms of economic development in the Sperrin AONB.

### **Main Issue 7: Minerals Development**

- 4.15 The majority of those who responded disagreed with the Council's preferred option for addressing minerals development but did not clarify why. In relation to the options, it was put forward that the period for minerals works should be shortened to 5 years or less, with others expressing that temporary/exploratory and prospecting works should not be allowed at all. Restoration works should be the responsibility of the minerals industry and not the taxpayer.
- 4.16 A large number of those who responded felt there should be a total prohibition to unconventional hydrocarbon extraction/fracking in the FODC area in line with the motion that was passed on the 30<sup>th</sup> July 2014 by the former Fermanagh Council. The following policy wording has been provided:

*“Fermanagh and Omagh District Council will oppose the granting of petroleum exploration licences over target strata described as shales, mud-stones, coal seams and ‘tight’ sandstone formations. There will be a presumption against planning applications associated with the exploration and/or development of*

*petroleum resources situated in shales, mud-stones, 'tight' sandstone formations and coal seams".*

- 4.17 A distinction should be made between the quarrying of aggregates such as sand, gravel and peat from the mining of precious metals such as gold and silver due to the severe consequences of this type of industry. Gold mining should be viewed in the same way as fracking, with a presumption against such activity. There is recognition by some that minerals contribute to the economy, particularly in rural areas and to the construction sector. Through restoration and monitoring, the quarrying industry provides many environmental benefits including long term improvements to biodiversity.
- 4.18 The following areas should be considered as ACMDs: ASSIs; Areas of Archaeological Potential; Sperrin AONB; UNESCO Geopark; SACs, European Priority Habitats, Ramsar sites, nature reserves such as the Murrins Nature reserve in the Sperrins, any areas near to settlements or housing, schools, rivers, water catchments, reservoirs or drinking resources and Greencastle/Gortin/Rousky area.
- 4.19 Others have argued that it is premature to apply areas of constraint on minerals without first establishing the volume of reserves which are currently available within the District. Mineral safeguarding areas should be added as a means of restricting rural housing development at inappropriate locations.

### **Main Issue 8 and 9: Renewable Energy**

- 4.20 The majority of those who responded agreed with the Council's approach to Renewable Energy. Those who disagreed with the Council's preferred option felt that renewable energy should be encouraged, and that local communities must have a stake in the profit. Reference was made to community owned renewable energy developed to create sustainable jobs and energy for local communities.
- 4.21 The following areas were suggested as Areas of Constraint for Wind Development: Belmore Mountain; Geopark; Sperrin AONB; Areas of Natural Conservation Interest; Areas of Archaeological Potential; Murrins Nature Reserve; and areas within Co. Fermanagh and Omagh which have a high volume of existing windfarms and single turbines.
- 4.22 Bessy Bell wind farm was evidenced as an example of wind energy development that could be accommodated into the landscape to such an extent that it did not prevent the designation of the landscape as an Area of Scenic Quality. Conversely, it was also argued that large scale wind turbines in terms of height or numbers, are only appropriate off shore.
- 4.23 The majority of those who responded agreed with the Council's preferred option for addressing Integrated Renewable Energy and Passive Solar Design. It was felt that the integration of renewable energy and passive solar

design should be an absolute requirement of all new developments unless there are demonstrable physical or technical feasibility constraints that make it impractical. It was proposed that all renovations to old houses should have to insert renewables technology.

- 4.24 It is also felt that the threshold for requiring integrated renewable technology and passive solar design should be lower. Low impact sustainable houses should be encouraged in all new builds and renovations where practical, and that Community owned and community controlled energy should be promoted.

### **Main issue 10, 11 and 12: Tourism**

- 4.25 The majority of those who commented on the tourism questions agreed with the Council's preferred approach to tourism and suggested locations that could be developed for tourism and 'Visitor Hubs'. Some commented that small scale tourist projects should be used to sustain rural communities as opposed to goldmining and windfarms. Eco villages should be developed and used in relation to tourism activities and visitor hubs. Designated coach parking in Omagh and Enniskillen was also requested for tourists to the area.
- 4.26 New tourism developments should be strictly controlled in and around the lake shores, unless small in scale and can be proven to be sustainable development. When referring to lakes and waterways those in the Omagh area should also be included. There should be restrictions on developing Lough Erne islands.
- 4.27 The following areas were suggested for Tourism/Visitor hubs: Carrybridge and Upper Lough Erne; Killesher and Arney – ecovillage; Lough Navar/Ballintempo forest - mountain biking; Lough Macnean and Arney Rivers – canoe trails; the Geopark; Sperrins AONB (including Gortin Glens, Gortin, Rousky, Greencastle and An Creagan); Bellanaleck; Loughmacrory; Kesh; Killadeas; Belcoo; Belleek; Brookeborough; Omagh; Enniskillen; Lisnaskea; Sixmilecross; Drumquin; and Tempo/Clabby.

### **Main Issue 13: Supporting Good Design and Place Making**

- 4.28 The majority of those who commented on the supporting good design and place making questions agreed with the Council's preferred option. There was also majority agreement that there should be supplementary planning design guidance specifically for the Sperrin AONB in conjunction with the adjoining 'AONB' Councils, with one respondent indicating that the AONB should be governed by one body and not four Councils. In addition it was suggested that there should be supplementary design guidance for the shores of Lough Erne, the Geopark and historic areas.

- 4.29 A 'One Planet Development Policy' approach was suggested to supporting good design and place making. Signage should be branded to reflect the tourism product on offer, this is especially necessary in the Sperrin AONB. The AONB should be designated a Gaeltacht area with signs in both Irish and English.

### **Carried Forward Policies**

- 4.30 Very few comments were made in relation to the carried forwards section. These were as follows:-

### **PPS 6 – Planning, Archaeology and the Built Heritage**

- 4.31 A number of Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential were suggested:- Church of Ireland yard, Glenroan Badoney; ancient Fort by Arney River; Copney Stone Circles; Mile Lane, Greencastle; Curraghinalt; Cleenish Island, Bellanaleck; Garrison; Monea/Tully; Newtownbutler; Islands off Lough Erne; Creggan; Drumquin; and local massrocks.

Suggested Local Landscape Policy Areas included: Big Dog and Little Dog Hillock Areas; woodland on the outskirts of Gortin, Crockanboy Road; and Termon Estate, Carrickmore.

### **PPS17 – The Control of Outdoor Advertisements**

- 4.31 A design guide should be produced to include historic areas for example the Conservation areas in Enniskillen, Lisnaskea and Omagh, and on the villages with character such as Brookeborough, Gortin, Ballinamallard, Belcoo, Belleek, Mountjoy, Monea and Sixmilecross. There are examples of appropriate signage controls in other jurisdictions. It was stated that there should be a presumption in favour of well-designed signage in the commercial centres of the two main hubs whilst it was set out that there should be a complete ban on signage outside of urban areas as it does not integrate with surroundings.

### **PPS 10 – Telecommunications**

- 4.32 It was suggested that mobile router hubs could be set up.

### **Town Centres and Retailing**

- 4.33 Savills (Ltd), on behalf of Ellandi LLP who manage Erneside Shopping Centre and the Showgrounds Retail Park, commented that 1,000 sqm gross external area, as a maximum threshold for requiring the submission of a Retail Impact Assessment, is inappropriate in the case of Enniskillen and Omagh, where

average comparison and convenience unit sizes are far below 1,000 sq. m. The approach would allow large scale units of 999 sq. m to be promoted in smaller towns and villages. Also, 1,000 sqm in an out of centre location in any of the local towns or even main towns is likely to be very damaging to the vitality and viability of the associated town centre given the limited population growth and increase in expenditure capacity forecast for the emerging plan period.

### **Town Centres of Enniskillen and Omagh**

- 4.34 The following comments were made in relation to the town centre boundaries and primary retail cores:
- Enniskillen Town Centre is from Belmore Street to the Hollow (and up to the Churches) also Derrychara/Erneside. Railway Street. Derrychara could be developed when Devenish College is relocated to the Tempo Road.
  - The Primary Retail core in Omagh is High Street.
- 4.35 Due to the limited size of Enniskillen and Omagh, respondents considered that it was not appropriate to designate further local centres within these towns. The designation of local centres would add an unnecessary layer of complication and that it would detract from the town centres. The focus should be on directing development and occupiers to opportunities within the defined town centres to deliver town centre regeneration and address vacancy rates. This would be in the interests of improving the vitality and viability of the centres in the most sustainable locations for all residents. It was considered that 'brownfield' sites in town centres should be developed before considering out of town development. There is also a need for nature/green areas within town centres.

### **Vacant Sites in Enniskillen and Omagh**

- 4.36 The redevelopment/reuse of the vacant sites in Enniskillen in Omagh should be used to address deprivation issues in urban areas. 'Creative' leasing to Artistic endeavours, similar to the Temple Bar area, should be promoted to enhance and re-invigorate the town. Stalls with locally grown produce should be set up on a daily/weekly basis to encourage local business and increase wealth generation throughput in the towns.

## **5.0 Summary of Key Findings from Public Workshops**

### **Public Workshops**

- 5.1 The launch of the Preferred Options Paper was followed by a series of 13 public consultation events across the Fermanagh and Omagh District Council area.



- 5.2 At these events a presentation on the context of the Preferred Options Paper within the Local Development Plan process was given, setting out the main issues and sets of options within it. Following this facilitators led introductions across smaller groups, asking each individual to identify their topic areas of interest to order to establish the priority areas for discussion. For some of the more poorly attended events, i.e. Kesh, Derrygonnelly, Fintona and Rosslea, the events took the form of a round table discussion, again led by the priorities identified by those in attendance.
- 5.3 Whilst attendees were encouraged to consider the breadth of the issues raised within the Preferred Options Paper, the issues of Renewable Energy and Mineral Development dominated a number of the consultation events, reflecting particular localised interests. Some of the matters raised were unrelated to the Preferred Options Paper and reflected discontent in relation to historic planning decisions.
- 5.4 The issues raised are considered against the vision and strategic objectives for the area; overarching principles; the spatial strategy and issues to be addressed in the LDP including sustaining our rural communities, tourism, minerals development, renewable energy and supporting good design and place making. Comments on Carried Forward Policies and other strategic issues raised are also included.

### **The Vision and Objectives**

- 5.5 There was limited discussion of the Vision and Strategic Objectives at the public consultation events. However, across the majority of the events there was a strong sense of the need to stop the decline of the rural area and to actively sustain rural communities.

### **Main Issue 1: Spatial Growth Strategy**

- 5.6 The options for the Spatial Growth Strategy were not raised as priority areas by many of the attendees. However, there were many comments made in relation to the need to sustain those parts of the FODC area which lie beyond the two main towns of Omagh and Enniskillen. Whilst there was a significant 'voice' in relation to the decline of the rural area this was not related solely to the countryside but also a concern expressed that in relation to the decline of the local towns (Dromore and Carrickmore), villages and smaller settlements and the need to sustain these, particularly in regards to the provision of land for economic development and affordable housing.

### **Main Issue 4: Sustaining Rural Communities**

- 5.7 Whilst there was overall agreement on the need to sustain rural communities and address the issue of decline in rural population and loss of young people from these areas there was not a general consensus on a way forward. The view was expressed that in order to manage the rural landscape and make it more vibrant that people needed to live in the countryside. It was also set out

that the integrity of the countryside should be protected and managed for future generations. Views varied from those who felt that there was a need for a more permissive policy context for single houses in the countryside to those recognising that the policy approach under the Planning Strategy for Rural Northern Ireland was a 'free for all' and was not sustainable. The position was put forward on a number of occasions that families should be able to build houses for their farms as well as providing for the non-farming rural dwellers with others indicating that these were already provided for.

5.8 Particular cases were being put forward to make provisions to:

- allow for the care of the elderly;
- address the need for a more flexible interpretation of siting of houses on farms, balancing the need to both integrate and cluster;
- retain the Dispersed Rural Communities as designated under the Fermanagh Area Plan 2007;
- define Dispersed Rural Communities;
- provide affordable housing to retain rural population;
- promote the re-use of vacant housing stock;
- consider the replacement policy in respect of the wall-steads of those dwellings which have deteriorated past the point of being acceptable as a replacement under current policy;
- allow for the regeneration of the rural area;
- support rural communities;
- allow for in-built flexibility into planning policy to enable 'good-sites' to be taken forward in favour of those which meet both the 'integrate' and 'cluster' tests.

### **Main Issues 5 & 6: Economic Development, Industry and Commerce**

5.9 There was a general consensus that the FODC area needed to become more connected, both physically in terms of the road network and digitally, in order for it to advance in terms of Economic Development, Industry and Commerce. Overall Economic Development was referenced mostly in terms of the need for the sustainable job creation within the FODC area, with some emphasis on enabling economic development within the rural area. There was discussion in relation to the use and availability of economic development land and further issues of achieving vehicular access as well as access to infrastructure on third party lands. The opinion was expressed that economic development zonings should act to consolidate and extend existing industrial/business parks where there is already a level of infrastructure in place.

5.10 Some people commented that the economic benefits of the renewable sector in the FODC area were not being passed on to the local communities. Others felt there was a need for the creation of rural business hubs to facilitate business with accommodation and good digital connectivity and that there was a need for revitalisation of some of the settlements to encourage/attract investment.

## **Main Issue 7: Minerals Development**

- 5.11 A mix of interested individuals and representatives from the Minerals Industry across the events provided comment in respect of the options presented and on mineral development generally. General comments in relation to mineral extraction from the industry reinforced the value of the mineral and aggregate industry locally and the dependence upon it for the construction sector whilst others called for a time limit for sand and gravel extraction. There was general comment in relation to the impact of mineral extraction on: the amenity of neighbours; the visual impact on tourism areas; and the impact of gold mining in particular.
- 5.12 In relation to Option 2, the Mineral Industry queried what evidence/assessment had been used to identify the Sperrin AONB as an Area of Constraint on Mineral Development. They indicated that the Council should not stymie the development of resources on the basis of where they are located, and emphasised the importance of employment generated. It was also argued to the contrary that Option 2 should be further tightened, putting forward that there was a need for greater protection within the Sperrin AONB from mining – stating that they do not want any industrial or commercial development within the AONB. Others cited that the lack of facilities in the area is due to the concentration of windfarms and the gold mine. Attendees put forward that Councils which have a share in the Sperrin AONB should have a similar planning policy approach to it
- 5.13 In discussing minerals development, both unconventional hydrocarbon extraction (fracking) and gold mining, dominated a number of events reflecting on-going local interest/concerns.

### **Unconventional Hydrocarbon Extraction**

- 5.14 The discussion in relation to ‘fracking’ focused in the main on the absence of options within the Preferred Options Paper regarding unconventional hydrocarbon extraction. Attendees were advised of the Council’s intention to reflect the regional policy on unconventional hydrocarbon extraction in paragraph 8.7 within the Preferred Options Paper which sets out that there should be a presumption against their exploitation until there is sufficient and robust evidence on all environmental impacts. Concerns were expressed that the Fermanagh and Omagh District Council should also be addressing their exploration – i.e. boreholes, as part of the policy approach. It was explained that at the time of the events exploration was part of a legislative test for permitted development. If the exploration extended beyond what was allowed for within legislation then it would be deemed to require planning permission which would invoke the presumption against unconventional hydrocarbon extraction.

## **Gold Mining**

- 5.15 A policy should be taken forward in relation to gold mining which requires developers to state what will happen to the proposal and to the site in 20 years' time. Representation from the Greencastle Residents Group expressed concern in relation to the extent of licenses for gold exploration and asserted that people had not initially appreciated the potential impact of the gold mine.

## **Main Issues 8 and 9: Renewable energy**

- 5.16 There was a strong body of anti-wind farm representation at a number of the events citing historic planning decisions in relation to wind farms and substations. Whilst these were not relevant to the options within the Preferred Options Paper following discussions a number of suggestions were forthcoming:
- applications for wind energy should include associated infrastructure such as substations. The siting, visual impact and any health concerns should also be part of the policy;
  - there is a need to consider the health and safety implications of wind energy;
  - Electro-magnetic fields should be taken into account in the determination of new applications;
  - Greater consideration should be given to the siting of wind turbines in proximity or adjacent to the AONB;
  - There is a need for community/social benefits arising from wind farms;
  - Wind farms should be located in one area;
  - Policy should include recommended distances from residential properties;
  - Too much emphasis on wind farms –still remains a need to support single wind turbines;
  - There is a need to protect service areas for wind farms;
  - Need to protect against over saturation with wind farms.

## **Main Issues 10, 11, 12: Tourism**

- 5.17 Overall tourism was recognised as a potentially significant economic driver within the Fermanagh and Omagh District Council area, with particular emphasis placed on the landscape, lakes and waterways as attractions. This strategic approach should follow through in the management of access to the lakes and waterways in line with Option 1. There was a consensus that a strategic joined up approach is needed and that this should be facilitated through the identification of tourism hubs to support their development and attractiveness to the customer. Potential tourism hubs suggested were Belcoo, Sperrins AONB and Aughakillymaude. There is a need for

consistency of approach to policy making by all the Councils with a 'share' in the Sperrin AONB.

### **Main Issue 13: Supporting Good Design and Placemaking**

- 5.18 Attendees agreed on the need to support sustainable good design and placemaking. It was put forward that the key sites forthcoming in the two main towns need to be addressed. The Council should have its' own 'design champion' to promote and engage with groups. The FODC area could be leaders in zero energy buildings.

### **Carried Forward Policies**

- 5.19 Generally the Carried Forward Policies did not feature in the priority areas identified for discussion at the events, except where they related to one of the Main Issues identified within the Preferred Options Paper. CTY 10 of PPS21, was identified as an area of concern, with the policy considered to be too strict. A lack of affordable and social housing was raised as an issue at a number of events. Issues were raised in relation to improving the level of digital infrastructure across the FODC area however the problem was viewed to relate to providers and not the current planning policy.

### **Other Strategic Issues**

- 5.20 Reference was made to the need to protect natural heritage, especially west of Lough Erne with specific references made to an area of fenland at Lough Navar.

### **Summary of key comments from Section 75 Workshops**

- 5.21 In conjunction with Community Plan, workshops were carried out across the following Section 75 Groups: Travellers Group; Omagh Ethnic Community Support Group; SWAP (South West Aging Platform); Youth Council Omagh; Youth Council Enniskillen; LGBT Fermanagh; Access and Inclusion Group; Surestart; and Omagh Community House. There was limited discussion of the Vision, Strategic Objectives and Spatial Growth Strategy. However, there was a strong message, from the youth groups in particular, in relation to the rural area 'having nothing' for them in relation to services, employment and future prospects for themselves.

### **Main Issue 4: Development in the Countryside**

- 5.22 There was discussion of the difficulties in achieving planning permission for single houses in the countryside and of the need to provide more opportunities for this. References were made specifically to the policy tests for a House on a farm and for replacement dwellings.

### **Main Issue 5 & 6: Economic Development, Industry and Commerce**

- 5.23 Across a number of the Section 75 groups concern was expressed in relation to the need for creation of jobs within the district. Whilst there was support for the provision of jobs within the two main towns there was also support for increased opportunities for businesses in the small towns, villages and countryside.

### **Main Issue 7: Mineral Development**

- 5.24 A number of the Section 75 Groups raised the issues of 'Fracking' and gold mining in the Sperrin AONB. It was felt that the Fermanagh and Omagh Council should be taking 'its own' stand in relation to unconventional hydrocarbon extraction beyond what is stated within the Preferred Options Paper in respect of the SPPS. There was also concern expressed at the potential impact of gold mining on the Sperrin AONB. There was also discussion of the role of the Plan Strategy in decision making regarding any application for the extraction of gold in the Sperrin AONB.

### **Main Issue 8 & 9: Renewable Energy**

- 5.25 There was little discussion of renewable energy.

### **Main Issue 10, 11 & 12: Tourism**

- 5.26 Whilst there was recognition of the potential for Tourism to contribute significantly to the local economy and the role of the assets within Fermanagh and Omagh to that industry there was little discussion beyond this.

### **Main Issue 13: Supporting Good Design and Place-Making**

- 5.27 Attendees agreed on the need to support good design and place-making, seeing it play a big role in the future development of vacant and up-coming sites across the two main towns. Suggestions were put forward in regard to the use of these sites for vocational training as they are considered to be central and accessible. The Accessibility and Inclusion Group referenced the need for particular regard to the design and décor of buildings. The Youth Group in Omagh were supportive in particular of stricter control of built heritage.

### **Carried Forward Policies**

- 5.28 The policies for a House on a Farm and Replacement dwellings were identified as areas of concern, with these policies considered to be too strict. A lack of affordable and social housing was raised as an issue at a number of

events. It was stated that 85% of rented accommodation was provided by the private sector and that this disguised the need for social housing within the District. It was also stated that there was a need for affordable housing. Issues were raised in relation to improving the level of digital infrastructure and road network across the District. There was also concern expressed in regard to the lack of age appropriate and up-to-date facilities and play areas across Fermanagh and Omagh. It was stated that families were leaving the district for 'days out' as facilities were either lacking, out of date or were difficult to access via public transport.

## 6.0 Summary of Comments on the Interim Sustainability Appraisal Report

- 6.1 A number of the statutory consultees, interest groups or members of the public commented specifically on the Interim Sustainability Appraisal (SA) as part of their consultation response. There was also a question on the questionnaire asking for views on the contents or findings of the Interim SA. Most chose not to respond to this question. Appendix 2 provides a summary of the comments received on the Interim SA.
- 6.2 Generally, comments on the Interim SA related to specific issues of interest to the respondent. Many of the responses provided a counter view on how scores were awarded against the various 'Options' within the Assessment Matrices at Appendix A of the Interim SA (e.g. a *positive* score instead of *negative* or vice versa).

### Comments from Statutory Consultees

- 6.3 DfI noted that the *Carried Forward* policies should be tested through the SA to ensure the LDP is sound, and that there appeared to be insufficient linkages showing how the Preferred Options had been informed by the SA. The Department for Agriculture, Environment and Rural Affairs (DEARA) SEA Team, raised concerns with the level of detail within the Interim SA on mitigation and where an impact was considered to be negative.
- 6.4 The Historic Environment Division (HED) of the Department for Communities (DfC) disputed a number of the scores awarded in the Assessment Matrices and with a particular emphasis on the potential positive impact of the re-use of non-designated heritage assessments and that some low carbon technology or integrated renewal energy can lead to a negative impact on heritage assets. Similarly, the DEARA SEA Team considered that some of the scores awarded were not correct or lacked robust justification to inform them. Gaelectric Developments Ltd (GDL) were concerned with some comments in the SA which they considered were subjective and thus unfairly negative against wind farm developments.

- 6.5 Both DfI and DAERA noted a number of other background documents that should be referred to in the Glossary and considered as part of Appendix 2 of the Interim SA.

### **Comments from Interest Groups**

- 6.6 Dalradian Gold Limited and Quarry Products Association Northern Ireland (QPANI) considered that the SA fails to fully recognise the socio-economic benefits of mineral development. Dalradian also raised some concerns with the procedural and technical compliance of the SA with relevant legislation, in particular, whether the Council had complied with the 2015 Practice Note 4 (Sustainability Appraisal) and had consulted with NIEA in respect of the draft Scoping Report. Notably, in their view, they considered that some of the reasonable alternatives put forward were not realistic and there was a failure to sufficiently involve statutory consultees and other interest groups at the scoping stage and thus undermining the process. Their viewpoint is that for this reason the POP and Interim SA should be revised and subject to re-consultation.

## **7.0 Conclusion**

- 7.1 The consultation with statutory bodies and the public has demonstrated that there is a wide range of different views being expressed regarding the Council's Preferred Options. Whilst there is recognition for the need for sustainable growth, there are different views on how much growth should occur in the countryside, as a proportion of the overall Housing Growth Indicator. People also had differing views on how restrictive the planning policy should be for minerals development and wind energy development in sensitive areas such as the Sperrin AONB and also raised concerns about how such developments can impact on tourism in the area. The Preferred Option for Sustaining Rural Communities invited comment mainly in regard to how potential Rural Protection Areas would be identified and the specific policies which would apply within them.
- 7.2 The challenge for the Council is to consider fully the comments that have been made when drawing up the draft Plan Strategy. It should be noted however that those representations that are site specific in nature, such as requests for inclusion of land within settlement limits, will be held over and considered in the preparation of the Local Policies Plan.