

[REDACTED]

Postcode

[REDACTED]

Email Address

[REDACTED]

Phone Number

[REDACTED]

Agents

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title

[REDACTED]

Organisation

[REDACTED]

Address

[REDACTED]

Address 2

[REDACTED]

City / Town

[REDACTED]

Postcode

[REDACTED]

Email Address

[REDACTED]

Your View

Unsound

Soundness Test No:

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Plan Component

Part 2, Section 4.0 Economy

Relevant Policy, Paragraph, Appendix or Proposal Map

TOU 01

Details

Part A of TOU 01 provides strong protection to Tourism Assets. The assets are defined but it would be clearer if they were listed. The protection offered to a tourism amenity or development in part B is not as strong. The objective of the catch-all protection offered in

TOU01B is worthwhile but it has too broad a range of interpretations and is not practical. Sometimes a tourism development might be a building, sometimes a public facility, sometimes accommodation and sometimes a commercial service. There are a wide range of issues which might impact on a wide range of tourism developments so a more practical policy would differentiate and provide measures of protection appropriate to each situation. How is viability tested/demonstrated - is this a measure of profitability or "need" ? TOU 01 does not provide protection to tourism hubs. Hubs are an important part of the Tourism Strategy. The overall quality of a hub may be more than the sum of its parts. In TOU 02 and TOU04 Development is encouraged to consolidate at hubs but it is unclear if a policy to protect tourism assets, amenities and developments will protect the quality of a hub. e.g. A proposal for a caravan park at a hub which is a country park and outdoor activity centre might make sense but if the hub is a five star golf resort it would not seem appropriate.

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TOU 02 -Tourism development

Details

TOU02 supports development at "existing and established tourism hubs". The location of these existing hubs is not provided. The definition of hub is unclear and curtilage of a hub could be impractical to determine on a case by case basis as applications are received. Not all hubs have the same qualities. The type of development suited to one hub could be unwelcome at

another. The policy makes no distinction between one hub and the next and might lead to approval of a development which damages the overall quality of a hub. The policy wording uses the term "Lough shores", but gives no definition or map to identify where this means. Is this entire waters edge of all loughs, even within towns? Lack of clarity will lead to problems in interpretation under TOU 02. Moreover it is not clear if the "Lough shore" referred to in TOU 02 is same as in other parts of the DPS, importantly, OSR 04. It is unclear whether proposals for development at tourism hubs within loughshore areas will receive any support. How will the economic objective of the Tourism strategy be delivered if a hub is within a designated loughshore location? Lough shores deserve to be given special protection above that provided in proposed AHSV, but less than proposed SCA? If this is appropriate and these places are the middle of three tiers of protection of landscape value so why not show them on map? Planning applications for tourism developments cannot be determined without first identifying if a site is inside a hub and/or inside a lough shore area. The mapping of the lough shore and the mapping of curtilage of hubs should be part of policy making process not figured out at time of application.

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TOU 01, third paragraph and para 4.57

Details

The objective of the policy is to protect A Tourism Assets and B Tourism Development. The third paragraph is a policy against change of use from tourism accommodation to dwelling but

if the double negative is removed it reads as an opportunity to get support and this might be counterproductive. A change of use from tourism accommodation into a dwelling would only appear reasonable, firstly, where there is evidence of a surplus of tourist accommodation in a location such that a tourism asset is already being damaged or put at risk and, secondly, where a dwelling would be a beneficial alternative outcome. There is no evidence given in SA Report Final Oct 2018 or Local Development Plan Tourism 2018, or elsewhere, to say that problems are arising from tourism development which is no longer needed or no longer viable for a tourism use. There is no evidence that a significant problem of this nature might arise in the future. There is no evidence of a significant decline in tourist visitors or need for accommodation in the FODC area as a whole. There is evidence of positive growth trend in SA Report final Oct 2018. FODC aims to help the tourism sector grow. There is no evidence of a general oversupply of tourist accommodation within FODC area. There is no evidence that there is too much of any class of tourism accommodation at any specific location. However, it might be true that in certain places this situation has already arisen and there is a difficulty that needs to be addressed at policy level. Without evidence it is not possible to know if the proposed policy is proportionate to the scale of the problem. Putting the onus on the applicant to provide evidence that "there is no realistic interest in its retention for the current use or for a tourism use" does not suit all circumstances. The applicant is only required to provide evidence of the non-viability of one building. 4.57 suggests this will be enough to make a case even where tourism industry is thriving. Where planning approval was given for an existing holiday home which did not have a condition stipulating it be used for "holiday letting only" will it be necessary for the applicant to prove it cannot be either a) sold as a holiday house as anticipated in planning approval, and/or b) not viable for holiday letting? It would seem likely that if all units sold as holiday homes were offered on a holiday letting only basis there would already be too many for the size of market in Fermanagh Omagh. Where the case is made to satisfy 4.57 it seems unlikely that other part so TOU 01, or any other policy, will be sufficient to go against it. If one holiday house becomes a dwelling will that ever have enough of an adverse impact on a far reaching asset such as the landscape at Lough Erne to justify it being refused under TOU 01 A? (If it does then is third paragraph redundant?) TOU 01 B would only prevent a change of use if there is no alternative provision in the locality. Although each application might be considered on a case-by-case basis it could nonetheless result in decisions which are inconsistent and set unhelpful precedents.

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TOU 02 and 4.65

Details

In respect to tourism accommodation policy says that "the size and design of units should deter permanent use". The message seems to be that Fermanagh Omagh welcomes visitors as long as they don't enjoy it so much they want to stay. Although it is largely carried forward from PPS16 this policy is unrealistic and inappropriate and not evidence based. Evidence is not provided to show that there is a problem in Fermanagh Omagh area resulting from tourism units being of a size or design suitable for permanent residence. There are alternative policies which should be considered to better suit the situation here. If the policy is reconsidered there is an opportunity to write a policy which makes Fermanagh Omagh a more distinctive tourist destination with a better range of accommodation than the rest of NI. There is no evidence that visitors prefer to stay in accommodation with a different layout or smaller unit size than a permanent home. Para 4.65 refers to restrictions on floor size. There is no evidence that small scale is always a better option / more sustainable than larger units. How will this policy operate compared to rising visitor expectations and NITB standards? Smaller units might not be as commercially viable or achieve a good NITB star rating compared to more generous ones. The ability for tourism providers to grow the sector will be hampered if the local "average family" market is promoted to the exclusion of the needs of niche markets eg groups of fishermen, wheelchair users, wealthy foreigners who might need or expect more space. The policy is not flexible enough to anticipate future needs. Can the market not be trusted to decide the appropriate size of unit? A policy which allows a range of accommodation of various sizes and typologies would seem more sustainable than the policy with a preference for only small scale cottages. The policy places less emphasis on developing tourism accommodation to best fit the needs of all visitors than it does on making sure people are offered less space than they might have in their own home. As a design strategy the policy is useful as it distinguishes between the quality and sense of place appropriate for tourism accommodation and familiar standardised suburbia. However this policy would be counterproductive if its rules result in only standardised holiday villages layout with only standard small rural cottages.

Modifications

Provide a list and map identifying tourism assets including the essential qualities to be protected. Provide a definition of tourism amenities, and list them. Provide a list and map of curtilage of existing tourism hubs, giving description of individual qualities of each. Provide a policy that protects the important individual qualities of tourism hubs. Define and/or map the "lough shore" in relation to any relevant policies. Reconsider third paragraph TOU01 and 4.57 to ensure that policy does not allow change of use of single buildings within a development where it has an impact on the development . Reconsider 4.65. Be generous when considering the needs of visitors. A holiday unit which has a design suitable as permanent dwellings might be what visitors want. The tourism sector might grow faster if the policy were more flexible. Remove preference for small size tourism accommodation units. Allow a range of accommodation types, not just cottages. Find a way to distinguish Fermanagh Omagh from rest of NI. Find other ways to distinguish holiday units from dwellings.

Representation

Oral Hearing

Data Protection

Consent to publish response

Yes, but without my identifying information