



[Redacted]

**Postcode**

[Redacted]

**Email Address**

[Redacted]

**Phone Number**

[Redacted]

**Agents**

**First Name**

[Redacted]

**Last Name**

[Redacted]

**Job Title**

[Redacted]

**Organisation**

**Address**

[Redacted]

**Address 2**

[REDACTED]

**City / Town**

[REDACTED]

**Postcode**

[REDACTED]

**Email Address**

[REDACTED]

**Phone Number**

**Representations**

**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 02 -Tourism Development

### **Details**

The policy wording uses the term "Lough shores", but gives no definition or map to identify where this means. Is this all loughs? 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 has a loughshore location? Lough shores deserve to be given special protection above that provided in proposed AHSV, but less than proposed SCA? If so and these places are the middle of three tiers of protection of landscape value so why not show them on map?

### **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 , CE4 It is reasonably flexible to enable it to deal with changing circumstances

### **Plan Component**

Part 2, Section 4.0 Economy

## **Relevant Policy, Paragraph, Appendix or Proposal Map**

TOU 02 - tourism development, also para 4.65

## **Details**

In respect to tourism accommodation policy says that "the size and design of units should deter permanent use". This is unrealistic and inappropriate. 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 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 fishermen, wheelchair users, wealthy foreigners. Can the market not be trusted to decide the appropriate size of unit? A policy which allows a range of accommodation of various sizes would seem more sustainable than the policy with a preference for only small scale cottages.

## **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 3.0 People and Places

## **Relevant Policy, Paragraph, Appendix or Proposal Map**

OSR 04 - protection of lough shores

## **Details**

The policy wording uses the term "Lough shores", but gives no definition or map to identify where this means. Is this all shores of all loughs? Lack of clarity will lead to problems in interpretation of OSR 04. It is not clear if the "Lough shore" in TOU 02 is same area as in OSR 04. Draft Plan Strategy has other designations and policies relating to natural environment,

tourism etc which will provide protection to those aspects of Lough shores. Is it necessary to have this policy as well? OSR 04 is presented as protection of lough shores but in conjunction with OSR03 seems to be a replacement to OS 6 Development of Facilities ancillary to Water Sports? OSR 03 is written in favour of recreational development but OSR 04 is a policy against development. Is there evidence to support this split approach? It is self evident that Lough shores are unspoilt areas. This might be evidence that current policies and designations of Fermanagh area plan have been effective in providing appropriate protection and might have been carried forward in part or in full. OSR04 Part b) is impractical. It is unclear where proposals for facilities for water sports will receive support. For any proposed development to receive support the acceptable level of adverse visual impact seems to be zero. The term "significant" seems to be deliberately omitted to place greater onus on developer? Visual impact is to be determined in conjunction with other existing and proposed development. This test might rule out all proposals outside towns, even at tourism hubs where policy TOU03 aims for consolidation of development. If the test of visual impact of water based development is to avoid a cumulative impact of proposal in conjunction with existing and proposed development it suggests a better to site the proposal will always be away from other existing or proposed development and therefore away from tourism hubs. Surely this is less sustainable than supporting water based leisure development in lough shore locations at tourism hubs? If water sport facilities are considered recreational use and not a tourist amenity then will tourism policies be given any weight? How much weight will be given to the Open Space Strategy in comparison with economic objective of the Tourism Strategy and environmental considerations?

### **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 protection of Tourism assets and Tourism Development

## **Details**

Part A of TOU 01 provides strongest 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 clear. The catch-all protection offered in TOU01B 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 development so for a new policy to be practical it should differentiate and provide measure of protection appropriate to each situation. Competition can provide tourism benefit by raising standards and providing choice but will TOU 01 B stifle growth by providing too much commercial protection from competition to established businesses that already provide a tourism amenity? Or can a proposed development of a new amenity provide sufficient tourism benefit such that it provides the necessary "alternative provision in the locality to offset the loss" of a pre-existing amenity? How is viability tested - is this a measure of profitability or "need" ? TOU 01 does not provide protection to tourism hubs. In TOU 02 Development is encouraged to consolidate at hubs but the overall quality of a hub is more valuable than the sum of its parts.

## **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 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 result in approval of a development which damages the overall quality of a hub.

## **Modifications**

Provide a list and map identifying tourism assets including the essential qualities to be protected.Provide a full definition of tourism amenities, and list them or give typical examples.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.Remove preference of small size tourism accommodation units or find another way to distinguish holiday units from dwellings.Modify OSR04 b) to say "significantly" adversely impact on the landscape character...etc.Clarify position in support of tourism and or leisure development at tourism hubs within lough shores.Modify OSR04 b) to avoid conflict/contradiction with TOU02. Support consolidating new tourism development at a tourism hub and also support water based tourism / leisure developments at tourism hubs. Current wording of OSR04 suggests the best way to avoid adverse cumulative impact on character or visual amenity is to develop water-based amenities away from other existing or proposed development, meaning best place for water based development is not at a tourism hub.

## **Representation**

Oral Hearing

## **Data Protection**

## **Consent to publish response**

Yes, but without my identifying information