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20th December 2018

Response to Fermanagh & Omagh District Council Local Development Plan 2030
Draft Plan Strategy

Strategic Allocation of Land for Housing (p.40)

There is a lack of housing in the FODC area and the proposed allocation for future dwellings in its entirety does not appear adequate. I have noted that only 28 new dwellings have been proposed for Carrickmore, this certainly would seem to under estimate the requirements. I would recommend that the proposed housing allocation in the wider FODC area is revised upward as it has the potential to stunt the growth and development, particularly in the designated local towns.

DE07 – Advertisements (p.57)

The part of the policy which would prevent businesses in the countryside from advertising outside of the curtilage of their existing business unless it is for directional purposes would place them at a disadvantage to urban businesses and therefore this aspect of the policy should be amended.

HOU03 – Affordable Housing in Settlements (p.63)

There is a major need for affordable housing in the FODC area so the policy proposal that residential developments of 10 units or more, or on a site of 0.5 hectares or more have 10% of the units are allocated for affordable housing is positive. The dependency on this policy however of the Housing Needs Assessment (HNA) concerns me as the HNA can regularly under estimate the need for affordable housing therefore the HNA requirement should not be necessary for the planning stage.

HOU06 – Open Space in New Residential Developments (p.67)

The requirement for an equipped children's play area to be an integral part of a development where there are 100 units or more, or for sites of 5 hectares or more is a positive addition. Consideration should be given to amending the policy to ensure that developers are not able to evade this requirement by building in phases.

HOU09 – Rural Replacement Dwellings (p.72)

The requirement for all external structural walls to be intact for the replacement of an existing dwelling to be permitted should be replaced with a requirement similar to section 'C' of the HOU11

proposal where it is permitting redevelopment of a former dwelling if there is a minimum of three external structural walls which are substantially intact or two which are substantially intact and are visible from critical views from public vantage points.

HOU12 (p.76) – Dwelling on a Farm Business

The requirement for a farm business to have been active for 6 years appears before a new dwelling will be supported appears excessive and a period of 3 years would be more appropriate. This should be sufficient to deter potential applicants from setting up a farm business solely for the purposes of getting planning permission for a new dwelling.

There should also be a more flexible approach to the evidence required for recognising a farm business, for example herd and flock records should be considered as evidence of an active farm business being in operation.

HOU14 – Rounding Off and Infilling (p.78)

The proposal would result in a tightening of PPS21 CTY 8 that is not necessary. The restriction of the policy into stating that there must be a focal point such as a junction of roads should not be required. In many instances the focal point is the family homestead and clusters have developed due to this and as a result of previous planning policies.

The current infilling policy which permits two dwellings should be retained. A reduction to one dwelling would reduce the opportunity for those living in rural areas to continue to do so and the change in policy could lead to confusion for people whose sites have already been approved but where building has not yet commenced.

HOU17 – Affordable Housing in the Countryside (p.81)

I would suggest there should be some more focal points added to where a housing development under this policy would be permitted such as a crossroads.

IB04 – Industry and Business Development in the Countryside (p.97)

The policy should take into consideration and support the creation of home-based cottage industries such as craft making. There should also be recognition and allowance for businesses that may require going beyond existing curtilage for storage purposes and that business owners in rural areas use their home and yard for the short-term storage of materials ancillary to their main business.

MIN01 – Minerals Development (p.123)

This policy should also state specifically that cyanide will not be permitted to be used for mining purposes and therefore reflect the European Union Resolution of 27 April 2017 on the implementation of the Mining West Directive (2006/21/EC).

In relation to peat extraction, the policy should enable people who do this for domestic purposes provided this is done with little impact on the local environment.