

From: Aine Coyle [REDACTED]
Sent: 20 December 2018 17:25
To: Development Plan
Cc: info
Subject: Representation : The Fermanagh and Omagh District Council Draft Local Development Plan 2030 - Draft Plan Strategy.

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Dear Sir or Madam,

We wish to respond in relation to The Fermanagh and Omagh District Council Draft Local Development Plan 2030 - Draft Plan Strategy.

We welcome the recognition by the council under section 4.27, of the wider benefits of renewable energy, as a major contributor to the production and generation of renewable energy through primarily wind energy resources.

Table 1 identifies strategic objectives, we welcome the council's commitment, under Number 16, to support renewables infrastructure. We note that the Fermanagh and Omagh may be regarded as an attractive and accessible place, and the expansion of renewables and associated infrastructure need not compromise this.

The council notes under section 5.12, "*generally, it is unlikely that ASAs will be able to accommodate large scale development such as quarrying or mining operations, turbines or wind farms, waste disposal, industrial units or major tourism schemes or proposals for the erection of telecommunications masts or pylons and as it is likely that the overall impact of such proposals could be particularly damaging to the distinct appearance, character and historic environment of the area.*" We wish to remind the Council that planning proposals should continue to be assessed on their own merits. Wind energy development should not be excluded from ASAI areas. It may be the case that an appropriately designed and assessed wind energy development within an ASAI would not damage the appearance, character and historic environment of the area.

In relation to section 6.29 and the Wind Energy Strategy Map, we do not believe it is necessary to designate specific areas of the county in accordance with classifications of "underlying capacity" or to identify broad areas of "Significant Cumulative Development". Wind farm developments can be fully assessed with reference to environmental and planning designation and through dedicated landscape and visual impact assessment. Areas for wind development are already significantly constrained by such designations, and the application of further designation may discourage future development.

These Capacity designations must be applied with flexibility, recognising that there are potential development areas within these so designated zones that do not conform to the general area definition.

Wind energy developments should continue to be assessed on their own planning merit, on a case by case basis. Land should not be sterilised to wind energy development based on partially subjective assessments of landscape capacity.

Draft Policy RE01 - Renewable and Low Carbon Energy Generation

Fermanagh and Omagh Wind Energy Strategy (Appendix 7).

- We welcome the recognition by Fermanagh and Omagh district under section 1.1. of Appendix 7 of the *“need to reduce dependence on fossil fuels for energy generation and supports the development of technologies to harness energy generated from renewable resources,”* and that, *“renewable energy contributes towards achieving sustainable development and offers new opportunities for additional investment and employment, as well as benefitting our health and wellbeing and quality of life”*
- Under section 1.2, however an expectation of *“continuing pressure to utilise the wind resource”* is described. Wind energy development should be recognised as a welcome opportunity to provide sustainable development and national benefits by harnessing one of the greatest wind energy resources in Europe.
- In section 1.6, areas of Underlying Landscape Capacity are defined, however the language refers to Large, modest and small scale development. It is not clear if this scale refers to the number of turbines in the grouping, their physical dimensions / overall height or MW output.
- In section 1.6, the meaning of the definition of *“Areas of Significant Cumulative Development”* is not clear.
- The guidance for Wind energy Development outlined in Section 2 of Appendix 7 outlines detailed prescriptions on the type of wind energy developments that can be accommodated in each LCA. If applied rigidly these recommendations will exclude important wind development opportunities.
- It must be recognised in the text that the LCA areas are described in broad brush. There will be pockets within the LCAs that do not conform to each area’s general description and where wind development of varied type may successfully be accommodated without significant adverse landscape or environmental impacts. It must also be recognised that landscape character may not necessarily change at the boundary of the defined areas. The LCA designations, descriptions or recommendations for future development outlined in this document cannot be applied without flexibility. These comments should be included as caveats to the plan.

The adoption of the identified Landscape Character Area prescriptions would unnecessarily constrain the future potential for harnessing of valuable renewable energy resources within this council area.

We note that a large proportion of the district council area has Grid infrastructure in place, e.g. new substations and powerlines, which will assist in integrating and accommodating increased wind energy. This should be capitalised upon.

We would be grateful if you could please confirm receipt of this correspondence.

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