

Representation to the Fermanagh & Omagh District Council's Local Development Plan - Draft Plan Strategy

On behalf of a Consortium of Housing Builders

December 2018

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Contact

Brian Kelly



Client

Omagh Housing Consortium

21 December 2018

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of a consortium of our housebuilder clients in response to the publication of, and formal consultation on, Fermanagh and Omagh District Council's ('the Council') Draft Plan Strategy ('DPS').
- 1.2 Our clients welcome the publication of the Draft Plan Strategy and the progress that the Council is making towards adopting a local development plan for the area.
- 1.3 This submission follows a number of discussions with our clients in relation to policy proposals and it seeks to highlight the real concerns expressed by our clients with respect to proposed housing policies.
- 1.4 In line with Council's procedures, each representation is set out on a separate page within each of the Chapter headings with the policy topic clearly identified.
- 1.5 To ensure that this representation is set within the appropriate planning context, we have reviewed all legislative, regulative and policy requirements/guidance associated with preparing local development plans in Northern Ireland and all supporting documents associated with the DPS and the preferred Options Paper, which are relevant to the topics/policies which we make comment on.
- 1.6 The remainder of this submission is structured as follows:
 - **Section 2** – Legislative Context
 - **Section 3** – Soundness in Plan Making
 - **Section 4** – People and Places
- 1.7 Finally, the submission is supported by the following appendix:
 - **Appendix 1:** Completed Draft Plan Strategy Questionnaire

2. Legislative Context

Introduction

- 2.1 Sections 6 (1) and (2) of the Planning Act (Northern Ireland) 2011 (the 2011 Act) set out that in Northern Ireland, the local development plan (LDP) for each of the 11 local authorities comprises a plan strategy (PS) and a local policies plan (LPP).
- 2.2 The PS represents the first formal stage of the two stage LDP process and Section 8(1) of the 2011 Act requires all Councils in Northern Ireland to prepare a PS for their districts.
- 2.3 In preparing its DPS, Fermanagh and Omagh District Council (FODC) is required to adhere to the provisions of the Planning Act (Northern Ireland) 2011 ('Act') and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').
- 2.4 This section identifies potential weaknesses in the compliance of the DPs with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

- 2.5 Under Section 8 of the Act, the Plan Strategy must set out:
- (a) the **council's objectives** in relation to the development and use of land in its district;
 - (b) its **strategic policies** for the implementation of those objectives; and
 - (c) such other matters as may be prescribed.
- 2.6 It is worth noting that the requirements of a Plan Strategy (PS) differ to those of a LPP, which are set out under Section 9(2) of the 2011 Act, these being:
- (a) the **council's policies** in relation to the development and use of land in its district (our emphasis); and
 - (b) such other matters as may be prescribed.
- 2.7 Essentially, the purpose of a PS is to provide the strategic policy framework for the plan area as a whole across a range of topics¹, whereas the purpose of the LPP is to set out the local policies and site specific proposals in relation to the development and use of land in its district².
- 2.8 Section 8(5) prescribes the following elements which a Council must take into account when preparing a PS:
- (a) the regional development strategy (i.e. the RDS 2035);

¹ Development Plan Practice Note 07 - The Plan Strategy, April 2015

² Development Plan Practice Note 08 - The Local Policies Plan, April 2015

- (b) the council's current community plan (i.e. The Belfast Agenda);
- (c) any policy or advice contained in guidance issued by the Department (i.e. the SPPS); and
- (d) such other matters as the Department may prescribe or, in a particular case, direct.

2.9 However, it is noted that Section 8(5) also provides the Council with discretion to have regard to such other information and considerations as appear to the council to be relevant.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

2.10 In addition to the Act, Parts 4 & 5 of the Regulations set out the requirement for the preparation of the Plan Strategy Development Plan Document (DPD). Part 4 sets out the requirements for the Form and Content of the DPD.

2.11 Part 4 Regulation (1) establishes that a development plan document must contain:

(a) a title which must give the name of the council district for which the development plan document is prepared and indicate whether it is a plan strategy or a local policies plan, and

(b) a sub-title which must indicate the date of the adoption of the development plan document.

2.12 Part 4 Regulations 12 (2) and (3) set out that a development plan document must contain a reasoned justification of the policies contained in it and that the policy and justification text should be readily distinguishable. We note that the Council has provided justification text associated with each proposed policies, however this should be considered alongside detailed comments on the soundness of the proposed policies, contained within the remainder of this representation.

2.13 Part 5 of the Regulations relates to the procedures for the preparation of the Development Plan Documents. Regulations 15 and 16 relate to the preparation of the DPS. Regulation 15 identifies a schedule of information that should be made available alongside the publication of the DPS. This includes:

“such supporting documents as in the opinion of the council are relevant to the preparation of the local development plan.”

2.14 It is our view that insufficient supporting information is available to support a number of the proposed policies in the DPS. We have identified these concerns within the remainder of this submission.

Development Plan Practice Note 07 - The Plan Strategy (April 2015)

2.15 Whilst this guidance document does not represent legislation, it is worth noting at this stage as the Department has set out a number of objectives within it which should be incorporated in the DPS.

2.16 These objectives are reproduced below, as they have helped to guide our review, assessment and critique of FODC's Draft Plan Strategy:

- reflect longer term local aspirations, based on a vision, objectives and strategic policies agreed to by the community and stakeholders;
- provide a plan-led strategy specific to the area covered, to act as a basis for rational and consistent decisions about the use and development of land and identify interdependencies and relationships between places both within and across administrative boundaries;
- provide a settlement hierarchy which identifies settlements and their role within the hierarchy in accordance with the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS and the current community plan;
- allocate land for housing whilst taking account of the strategic objectives and guidelines contained in the RDS and any policy or advice issued by the Department such as the SPPS and the current community plan;
- facilitate economic development and the creation of employment whilst taking account of the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS, and the current community plan;
- facilitate sustainable patterns of growth and regeneration whilst promoting compact urban forms and protecting and maintaining distinctive local character and viability. This may include strategic zonings and/or policy areas where considered necessary;
- identify and define, as appropriate, transportation related proposals, whilst taking account of the RDS and regional transportation proposals contained in Ensuring a Sustainable Transport Future (ESTF);
- conserve, sustain and enhance the area's environmental qualities, local distinctiveness and sites of environmental importance in terms of landscape character and diversity, wildlife and habitats, townscape and archaeology;
- promote the development of sustainable tourism, recreational and other community facilities that will positively contribute to the amenity and wellbeing of the population; and
- facilitate the promotion of equality of opportunity and good relations between persons of different religious belief, political opinion or racial group.

- 2.17 The Department also advises councils to ‘...aim to ensure that its PS is **both realistic and deliverable** taking into account the **resources available and any potential constraints** which may arise during the plan period (our emphasis). Furthermore, in order to allow for unforeseen circumstances, the Department directs councils to ‘...aim to incorporate **a degree of flexibility** within its PS **to ensure** that its objectives and strategic policies for its area can still be **delivered**’ (our emphasis).
- 2.18 Once drafted, a PS is required to undergo a formal 8 week period of public consultation and following this, all representations submitted will be made available for public inspection (counter representations) for a further 8 week period. The Department advises that all representations should provide evidence to demonstrate why the draft PS is unsound and/or how any proposed changes make the draft PS more sound.
- 2.19 Ultimately, the plan strategy will undergo an independent examination and must be found ‘sound’ if it is to be formally adopted.

Legislative Compliance

- 2.20 We note that the DPS does identify a number of strategic objectives under the themes of People and Communities and Economic and Environment. Furthermore the DPS includes proposed strategic policies under the same themes. Whilst this information is included within the DPS, the remainder of this representation sets out our comments on the soundness of the proposed objectives and policies.
- 2.21 The Act also stipulates that the Plan Strategy should be prepared in accordance with the Council’s Timetable, as approved by the Department and in accordance with Council’s Statement of Community Involvement.
- 2.22 The FODC Timetable, as approved and published on Council’s website is dated June 2018. We note that Council has published its DPS within the broad timeframe that they provided (i.e. 3rd Quarter of 2018/19). However, we would highlight that the timeframe proposed was to include:
- An 8 week statutory public consultation period; and
 - An 8 week statutory consultation on counter representations;

3. Soundness in Plan Making

- 3.1 The keystone of the local development plan system is the principle of ‘soundness’. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:
- whether it satisfies the requirements of sections 7 and 8 or, as the case may be, sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
 - whether it is **sound**.
- 3.2 The Planning Act (Northern Ireland) 2011 does not define the meaning of ‘soundness’. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of ‘showing good judgement’ and ‘able to be trusted’.
- 3.3 Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:
- how the development plan document (DPD) has been produced;
 - the alignment of the DPD with central government regional plans, policy and guidance; and
 - the coherence, consistency and effectiveness of the content of the DPD.
- 3.4 DPPN 6 advises that ‘soundness’ involves testing the principles, content and preparation process of the DPD against a list of key criteria. DPPN 6 then sets out the following tests which ‘...aim to provide a framework to assess the soundness of the DPD, whilst taking account of all relevant procedural, legislative and policy considerations’:

Procedural tests

- P1. Has the plan been prepared in accordance with the council’s timetable and the Statement of Community Involvement?*
- P2. Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3. Has the plan been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4. Did the council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?*

Consistency tests

- C1. Did the council take account of the Regional Development Strategy?*

C2. Did the council take account of its Community Plan?

C3. Did the council take account of policy and guidance issued by the Department?

C4. Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Coherence and Effectiveness tests

CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring councils.

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

CE3. There are clear mechanisms for implementation and monitoring.

CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

3.5 Although the tests of soundness are based upon these three categories – procedural, consistency, coherence and effectiveness, there is a degree of overlap in terms of the criteria used for each test. The purpose of the IE will be to examine how the DPS meets each test and determine whether the DPS is sound as a whole.

4. People & Places

Draft Policy HOU01 – Housing in Settlements

Draft Policy HOU01 is unsound as the policy fails the test of CE 2 and CE 4 - Coherence and Effectiveness

The policy is incoherent in that evidence has not been provided to demonstrate that the policy: can be achieved; is realistic; and reasonably flexible.

We seek that the policy is reconsidered on the basis of a robust evidence basis

- 4.1 Draft Policy HOU01 sets out a presumption that all new housing developments will be delivered on previously developed land within the existing urban footprint.
- 4.2 The policy goes on to set out instances when consideration will be given to permitting development on greenfield sites. Principally, this focuses on instances when there is an unmet need for affordable housing or future need exceeds the number of planning permissions.
- 4.3 The policy fails to satisfy the test of CE2 in that:
- The policy is not founded on evidence which demonstrates that the projected requirement of 5,190 units can be fully met on brownfield sites.
 - the policy does not acknowledge the inherent issues with brownfield sites, such as physical constraints, complex/multiple land ownerships, contamination, viability, etc and there is no evidence provided which shows that these sites can deliver the required housing within the lifetime of the plan.
 - It ignores that there may be specific locational based requirements which would necessitate the development of a greenfield site or an exceptional circumstance.
- 4.4 The policy fails to satisfy the test of CE4 in that:
- The policy does not incorporate an appropriate degree of flexibility in accordance with paragraph 6.140 of the Strategic Planning Policy Statement which requires Councils to ensure that a constant supply of deliverable housing land is available over the lifetime of the plan.

Recommendation

- 4.5 We respectfully suggest that Council prepares an up to date evidence base to support this policy and on the basis of the evidence collated reassesses whether the evidence supports this policy position.

Draft Policy HOU03 – Affordable Housing in Settlements

Draft Policy HOU03 is unsound as the policy fails the tests of CE 1, CE 2 and CE 3- Coherence and Effectiveness

The policy is not founded on a robust evidence basis which explains the rationale behind the policy triggers and provides a clear understanding of the implications arising from the policy

Our clients request the Council to reconsider its evidence basis to support the Affordable Housing policy

- 4.6 Council’s proposed policy for securing affordable housing is set out at Policy HOU3. The policy states that: *“Planning permission will be granted for residential development on sites greater than 0.5 hectares and/or containing 10 or more dwelling units where a minimum of 10% of units are provided as affordable.”*
- 4.7 The draft policy then goes on to clarify that:
- Affordable housing will comprise social and/or intermediate housing.
 - A tenure blind approach is proposed.
 - Provision will be secured via a Section 76 Legal Agreement.
- 4.8 Our clients fully support and welcome the intent of the policy which flows from the Regional Development Strategy 2035 and the SPPS. However, in its current format the policy does not meet the tests of Soundness for the following reasons:
- The proposed threshold approach does not fully align with the approach set out in the SPPS (soundness test C3);
 - The proposed approach does not align with the Council’s own evidence base (soundness test CE2);
 - A robust evidence base which takes account of viability is required (soundness test CE2); and
 - The proposed approach will not be effective as it does not reflect the mechanisms for the provision of social and intermediate housing in Northern Ireland (soundness test CE2 and CE3).
- 4.9 The policy as proposed is a threshold policy that applies across the Council area. The SPPS is clear at paragraph 6.143 that:
- “The development plan process will be the primary vehicle to facilitate any identified need by zoning land or indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing.”*

- 4.10 The approach set out in the SPPS directs us towards a locational policy approach where affordable housing is catered for through zonings and key site requirements. Whilst Councils can depart from the approach set out in the SPPS, they should only do so where the evidence exists to justify such a departure. Council's evidence for underpinning this approach is lacking and therefore there is no evidential case for a departure from the SPPS and as such fails soundness test C2.
- 4.11 In order to comply with soundness test CE2 it is recommended that Council should undertake their own assessment and consideration of affordable housing to reflect the baseline and future requirements for the Council area.
- 4.12 The HMA amongst other things considers house prices and affordability, intermediate housing and social housing. It references that affordability is an issue within the Council area but that overall the Council area is the second most affordable location in Northern Ireland. This statement jars with the policy threshold which would be applied across the Council area, irrespective of any specific local circumstances.
- 4.13 In relation to the proposed site threshold, Council has no substantive evidence to:
- justify the proposed threshold; and
 - justify a 10% requirement across all site sizes above 0.5ha .
- 4.14 Council has also failed to consider the practical implementation of the policy in terms of who will deliver the social and affordable aspects – is it registered housing association or other bodies providing a bespoke housing product? As a result the policy fails against soundness test CE2 and CE3.
- 4.15 We would suggest that Council needs to reassess and supplement the evidence basis prepared to date, ensures that reasonable alternatives have been considered and that the proposed policy is founded on a robust up to date evidence basis.

Housing in the Countryside – Context and Justification

Approach to Housing in the Countryside is unsound as the policy fails the tests of C1 and C2 – Consistency Tests and CE 1 and CE 2 - Coherence and Effectiveness

The policy is not founded on a robust evidence basis which explains the rationale behind the policy approach and targets

Our clients request the Council to reconsider its evidence basis to support this approach and review its targets/allocate more housing to the main towns

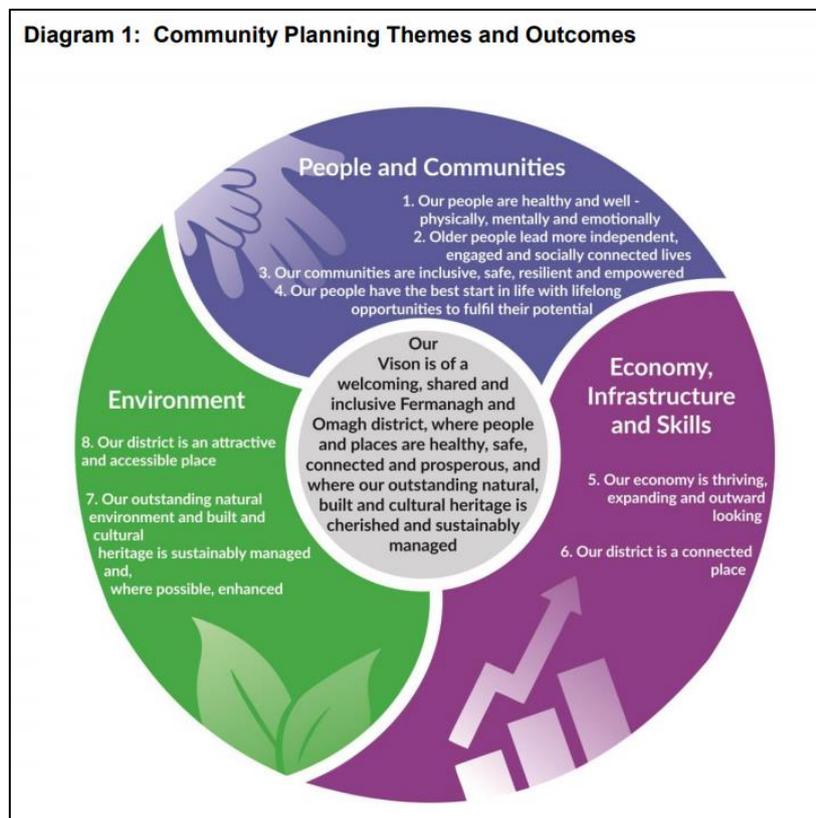
- 4.16 Table 8 of Chapter 7.0 entitled ‘Monitoring Indicators Explained’ sets a target of delivering 23% of the 5,190 homes over the lifetime of the plan in the open countryside. Our clients are worried by the approach set out in this section of the DPS and the 23% target set out in Chapter 7.0 Monitoring and Review of the DPS.
- 4.17 The DPS, in Table 8 of Chapter 7.0, acknowledges that the RDS sets a regional target of 60% of new dwellings on appropriate brownfield land within the urban footprint of settlements with a population of more than 5,000 (i.e. Omagh and Enniskillen for the district).
- 4.18 However, the DPS then states that ‘...given the rural / urban split within the district compared to the rest of NI this is unlikely to be achieved’. Indeed, Table 16 of the Background Paper entitled ‘Population’ identifies this urban/rural split as it states that in 2011, the proportion of households in the countryside was 40.8% (16,931) in 2011 compared to 59.2% (24,581) in the settlements.
- 4.19 We note that this information is quite dated and in the interests of ‘soundness’ a more recent split would be helpful to properly inform the targets and housing policy.
- 4.20 In light of the urban/rural split, the DPS sets a target of delivering 47% of the 5,190 homes over the lifetime of the plan in the ‘main towns’ as opposed to the 60% set out in the RDS. The rationale for this approach appears to be based on the above findings and Para 3.31 of the DPS states that ‘*The Council views facilitating new residential development in the countryside as playing a key role in addressing the need to sustain our rural communities*’.
- 4.21 However, there is no evidence provided which substantiates: this departure from the RDS; the need for 23% of the overall housing target to ‘sustain our rural communities’; and that a lesser target would not achieve this outcome. This approach jars with Para 3.30 of the DPS, which also relates to housing in the countryside, as it states ‘*As with housing in settlements, growth must be managed in order to achieve appropriate and sustainable patterns of development*’.
- 4.22 If the Fermanagh and Omagh District Council is to achieve sustainable patterns of development, it needs to address the urban/rural split by supporting the delivery of services in accessible locations which will require enhanced critical mass. This can only be achieved by directing new housing to the existing towns, villages and smaller settlements, especially its main towns.

4.23 We fully appreciate the need to sustain the rural community and economy, but there is no evidence that this approach will achieve this outcome. The current target will only serve to allow too many new houses to sprawl throughout the open countryside in a manner that puts pressure on existing services and fails to provide the critical mass in the right locations so as to enable investment in existing services and reinforce further service delivery in a sustainable manner.

4.24 Diagram 1 of the Fermanagh and Omagh Community Plan, reproduced below, succinctly illustrates its vision and its planning themes and outcomes. The approach to housing in the countryside, in its current form, with a target of 23%, will conflict with the Community Plan's Vision, particularly the following, '*...where people and places are healthy, safe, connected and prosperous, and where our outstanding natural, built and cultural heritage is cherished and sustainably managed*'.

4.25 In addition, the approach to housing in the countryside is at odds with the following themes and outcomes of the Community Plan:

- Our people are healthy and well – physically, mentally and emotionally;
- Older people lead more independent, engaged and socially connected lives;
- Our district is a connected place;
- Our district is an attractive and accessible place;
- Our outstanding natural environment and built and cultural heritage is sustainably managed and, where possible, enhanced;



5. Recommendations

- 5.1 Section 10(2) of the Planning Act (Northern Ireland) 2011 advises that the Council must not submit a plan to the Department unless it has complied with any relevant requirements contained in regulations and it believes the document is ready for independent examination.
- 5.2 Noting the issues set out within this submission, we respectfully request Fermanagh and Omagh District Council does not submit the DPS to the Department in its current form as we have serious concerns about its 'soundness'.
- 5.3 The identified gaps in information prejudice the entire Local Development Plan (LDP) process and the Council's ability to formulate a sound and lawful local development plan.
- 5.4 However, if Fermanagh and Omagh District Council decides to submit the DPS in its current form to the Department for Infrastructure for an independent examination, we respectfully request an opportunity to appear and be heard at the Examination in Public in accordance with Section 10(7) of the Planning Act (Northern Ireland) 2011.

Appendix 1: Completed Draft Plan Strategy Questionnaire



Fermanagh & Omagh Draft Plan Strategy Representations Form

Hard Copies of the Draft Plan Strategy are available for inspection during normal opening hours at the council's principal offices. The documents, electronic copies of this form, and our 'Guidance for Making Responses to the Plan Strategy' may be viewed at: <https://www.fermanaghomagh.com/>

How to respond

You can make representations about the Draft Plan Strategy by completing this survey form, or if you prefer, you can fill out this form online.

For further assistance contact: developmentplan@fermanaghomagh.com or Tel: 0300 303 1777; All representations must be received by 21st December 2018 at 12:00 noon.

SECTION 1. Contact Details

Individual Organisation Agent (complete with your client's details first)

First Name

Last Name

Job Title (Where relevant)

Organisation (Where relevant)

Address

Postcode

Telephone Number

Email Address

If you are an Agent, acting on behalf of an Individual or Organisation, please provide your contact details below. (Please note you will be the main contact for future correspondence).

First Name

Brian

Last Name

Kelly

Job Title (Where relevant)

Director

Organisation (Where relevant)

Turley

Address

37 Clarendon Street

Derry-Londonderry

Postcode

BT48 7EG

Telephone Number

02871262634

Email Address

[REDACTED]

SECTION 2. Representation

What is your view on the Draft Plan Strategy?

Sound

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below.

(Continue on a separate sheet if necessary)

OR

Unsound

If you consider the Plan Strategy to be **unsound**, please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6.

Soundness Test No:

- P1 Has the Draft Plan Strategy been prepared in accordance with the council's timetable and the Statement of Community Involvement?**

- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?**
- P3 Has the Draft Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?**
- P4 Did the council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?**
- C1 Did the council take account of the Regional Development Strategy?**
- C2 Did the council take account of its Community Plan?**
- C3 Did the council take account of policy and guidance issued by the Department?**
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?**
- CE1 Does the Plan Strategy sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the Draft Plan Strategies of neighbouring councils?**
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**
- CE3 Are there clear mechanisms for implementation and monitoring?**
- CE4 Is it reasonably flexible to enable it to deal with changing circumstances?**

Plan Component - To which part of the Draft Plan Strategy does your representation relate?

- | | |
|-------------------------------|--|
| (i) Relevant Paragraph | Please refer to attached |
| (ii) Relevant Policy | Draft Policy HOU01, HOU03 and Housing in the Countryside |
| (iii) Proposals Map | |
| (iv) Other | Section 3 – People & Places |

Details

Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to attached representation

(Continue on a separate sheet if necessary)

Modifications

What, if any, modifications do you think should be made to the section, policy or proposal? What specific modifications do you think should be made in order to address your representation?

Please refer to attached representation

(Continue on a separate sheet if necessary)

If you are seeking a change to the Draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

- Written Representations** **Oral Hearing**

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

By proceeding and submitting this representation you confirm that you have read and understand the privacy notice above and give your consent for Fermanagh and Omagh Council to hold your personal data for the purposes outlined.

Consent to Public Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Please note: Even if you opt for your details to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner/Authority they appoint to oversee the examination in public into the soundness of the plan. This will be done in accordance with the privacy statement above.

- Yes with my name and/or organisation**
- Yes, but without my identifying information**

Signature

	
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Date

20/12/2018