

From: Brian McCaffrey (Councillor)
Sent: 21 December 2018 11:45
To: Development Plan
Subject: Response to Local Development Plan 2030 Draft Plan Strategy

Follow Up Flag: Follow up
Flag Status: Flagged

Hi all.

I wish to respond to the consultation on the LDP 2030 DPS.

Dispersed Rural Communities

As you are aware I live in Roslea. In the Fermanagh Area Plan 2007 three rural communities in Roslea Ward were designated as Dispersed Rural Communities in the Settlement Hierarchy. A further eight DRCs were designated in other parts of Fermanagh, two of those in Erne East DEA. It will therefore come as no surprise to you that I have had a significant number of representations regarding the failure to include the DRC designation in LDP 2030 DPS.

Some of those I spoke to were angry that their response to the POP consultation appeared to have been ignored. Others felt that the removal of the DRC designation robbed them of an important funding lever. Almost all felt that their recognition as a strong community within a wider rural area was being undermined or removed. What is abundantly clear is that they all perceive the removal of the designation as a negative development for their community.

It has also been pointed out to me that while Draft Policy RCA01- Rural Community Areas is included in the Draft Plan Strategy, no areas have been designated and there is no certainty that any of the current DRCs will be.

The FODC Community Plan states that Fermanagh is primarily rural. It acknowledges that it will be a key challenge "to ensure the continuous vitality and sustainability of our rural communities" (p5).

The decisions to exclude DRC designations and not include designated Rural Community Areas make the aims of the Community Plan that much harder to achieve. In taking this course it has also ignored the concerns raised about DRCs in POP responses. (P2, P4, C2).

The only justification that has been advanced (*verbally*) for their removal is that they are not included in the SPPS. I cannot find any written justification for the removal of the designation. Mid Ulster Council do not appear to be constrained by the non-inclusion of the designation in the SPPS. They note in their POP that DRCs are generally located in low development pressure areas and are considering designating more DRCs in the Council area.(C4, CE1).

Monaghan County Council Plan includes DRCs at Tier 6. Monaghan is similar to FODC area in that much of the population lives in the rural countryside. Cavan County Council Plan and Leitrim County Council Plan also recognise the existence of small tight-knit rural communities within the rural area. (C4, CE1)

The Rural Needs Impact Assessment (Statutory Requirement) fails to deal adequately with the concerns raised regarding the removal of the DRC designation and also fails to properly assess the impact that the removal will have on those communities. This is a serious issue given that

the DPS is effectively down-grading them from their current status to rural countryside with no designation. It is difficult to understand how the assessment could be deemed complete without considering this clear change in policy.

I believe that the best way to resolve this is to include DRC designation in the Settlement Hierarchy. This would involve changing SP02, Table 2, Table 3 and the Settlement Hierarchy map. If they are reinstated a check would need to be made on the townlands that make up the DRCs as the original listings had excluded a small number of townlands that the community maintain are part of the actual area.

Aghadrumsee

Aghadrumsee is one of the original DRCs but is big enough to be designated as a Small Settlement. It is made up of two nodes three quarters of a mile apart. The eastern node is made up of a church and cemetery, a new school which was designed to double as a community centre, a small housing estate of six NIHE houses, ten private houses and a commercial garage (currently unoccupied). It is served by a sewage treatment plant. The western node comprises a church and cemetery, a hall, eight private houses, a small primary school (the kitchen provides school meals for both schools) and a disused waterworks.

There is sufficient development in either node to allow them to be designated as a small settlement and I would urge that this is done within the current Draft Plan Strategy.

Clough

Clough is a small group of five houses, a church and cemetery, a hall and a low stone out building built around a T junction and located about 100 meters from the border with Co Monaghan to the south and east. It is just over a mile from Roslea village. Its development has been curtailed because of the proximity of the border but has retained its own distinct identity.

Similar focal points have been classified as Small Settlements. While it has been over-looked previously I believe now is an opportune time to add it to the list of Small Settlements.

Draft Plan Strategy

SP02-Settlements

This policy was formulated without having fully taken account of submissions detailing the need to retain the DRC designation in the DPS. There was also an opportunity to re-classify some DRCs as Small Settlements given the level of facilities and infrastructure they currently have. This opportunity was not taken. It would appear that MUDC's POP and existing CC Plans in adjacent areas were not adequately considered.(P2, C4, CE1)

DRCs should be included in the Draft Plan Strategy. Any DRC with sufficient facilities and infrastructure should be upgraded to Small Settlement Classification.

General Comments

HOU5(d)

The definition of "useable garden space" should mean enough space for a disable person extension *and* adequate garden space.

HOU5(i)

"Reasonable separation distances" should be defined in specific measurements depending on the overhead line type. Surely the SPPS Health and Well-Being section makes this possible.

HOU06

Bullet point 3 (p68) allows for a reduction in space for elderly people or people with disabilities. This is open to challenge under Section 75. I view it as being unacceptable and strongly believe it should be removed from the policy.

HOU09, HOU10, HOU11

I welcome these policies in that they provide a welcome opportunity to tidy up one of the more unsightly aspects of the countryside as well as helping to sustain rural communities. However, these buildings are almost exclusively owned by the farming community and will be retained by them for the use of their family whenever they deem it appropriate.

Under this draft policy the non-farming rural dweller, many of whom make a considerable contribution to rural community life, are still no closer to finding a policy that will allow them to develop a home in the community that they contribute to.

HOU14

The SPPS refers to the development of a small gap site without specifying whether it could take one or two dwellings. PPS21-CTY8 allowed up to two dwellings provided the proposal respected the guidelines relating to the existing development. This draft policy has effectively further restricted what was the only real opportunity for the non farming rural dweller to acquire a site in the countryside.(CE2)

The policy is assessed in the RNIA as having a positive impact on people in the countryside in that it will provide additional development opportunities. It clearly does not when compared to the previous policy.

I suggest the policy be worded as in PPS21 CTY8.

That concludes my submission.

Best Regards

Brian McCaffrey