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Planning Department,
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16 High Street,
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By email: developmentplan@fermanaghomagham.gov.uk

Friday 21st December 2018

Dear Sir/Madam,

RE: UAH Response to Fermanagh & Omagh District Council Draft Local Development Plan

Ulster Architectural Heritage welcomes the opportunity to respond to Fermanagh and Omagh District Council Draft Local Development Plan.

The strength, or indeed weakness, of a local development plan may be assessed by two things. The individual initiatives that it puts forward, and the way in which the exact policy to support these plans is explained. The latter being of equal, if not more importance and is of particular relevance, when considering the quality and the practical future effectiveness of a local development plan. What happens in reality, the future of our historic buildings, streets and cities is dictated by how exacting and robust an LDP is in its detail. Down to the last word.

UAH contends that the draft policy in terms of its detail, justification and amplification is insufficient. Fermanagh and Omagh has the option to adopt the Planning Policy Statement 6 (PPS6) in its entirety in the LDP. Principles for the protection of built heritage that have been established since 1999. Policy that is robust in itself, when it is applied in full.

UAH notes that some diversions from PPS6 have been made, diversions that we believe have the serious potential weaken to the protection of Fermanagh & Omagh's important heritage assets. The way in which the draft policy is set out for listed buildings, conservation areas may be seen to degrade the existing PPS 6. We argue that PPS6 and the SPPS, and their associated supplementary guidance are sufficient resource upon which to base planning decisions for the historic environment. We stress that these need to be adopted by Fermanagh and Omagh District Council, **in full**.

Significant, but not exhaustive list of diversion from PPS6, is as follows:

- 1) **Draft Policy HE03 - Listed Buildings and their Settings, page 132, reduces the current policy from a 5 point, 8 page to a 2 point, 2 page framework, currently PPS 6, BH 7-11. The draft policy omits significant policy detail, and important elements of explanatory justification and amplification that are fundamental to the understanding of the policy;**

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Particularly, within Draft Policy HE03 - Listed Buildings and their Settings, page 132, we note with significant concern the relaxation of current BH10 - Demolition of a Listed Building: *b) Demolition of a Listed Building. The total or part demolition of a Listed building will only be permitted in exceptional circumstances where it is demonstrated that: demolition is **desirable** or necessary...*

The very submission of an application for the demolition of a listed building implies the desire to demolish it. Therefore the inclusion of *desirability* for demolition within this policy does not imply test, but a given, and must be removed.

We cannot find reference to Repair Notices or Urgent Works Notices within this document, detailed reference for this is currently included in Annex D of PPS 6. These are powers which Fermanagh and Omagh now have and the Council's full powers and responsibility with regard to the Historic Built Environment should be included in full.

- 2) **Draft Policy HE04 - Conservation Areas, page 134, reduces the current policy from 3 point, 6 page to a 2 point, 2 page framework. Again the draft policy omits significant policy detail, and important elements of explanatory justification and amplification that are fundamental to the understanding of the policy.**

Particularly, we note the reduction of the Enniskillen Conservation Area in the location surrounding former Portora Royal School, adjacent to the Brook and Willoughby Place. This part of the Enniskillen Conservation Area is incredibly important, rising up in the context of the town's most notable and intact historic streets, in the context of views from the conservation area, from and to the listed former Portora School.

The reduction of the Enniskillen Conservation Area is not clearly stated in the documents, and can only be established by cross referencing the conservation area plans against the current Planning NI Conservation Area maps. This important change may not have been noted by many of those assessing the Draft Plan.

We do not believe that any reduction in the Enniskillen Conservation Area is necessary, and query the justification for this. We also ask what public consultation has been carried out in advance of this proposal to change the boundary of a conservation area? We strongly recommend that this decision is reversed.

In addition with regard to Draft Policy HE04, we also note that Draft Policy HE04 - Conservation Areas also omits important reference to Article 4 Directions. Article 4 directions should be included in the final plan.

In terms of section 7, Monitoring and Review, **Monitoring Indicator 22: Number and Condition of Heritage Assets**, the framework for monitoring is insufficient, and the table presents 'no target'.



The number of heritage assets should not change if the aforementioned policy is altered to be robust enough to protect them through council processes, other than when designations are added and therefore numbers of listed buildings, conservation areas, or areas of townscape character increase. Perhaps in the context of an indicator for 'Numbers of Heritage Assets' a conclusion of 'No Target' may be appropriate.

Monitoring of condition is a different consideration entirely and should be considered separately to numbers of heritage assets. The Heritage at Risk (formerly Built Heritage at Risk, BHARNI) register is developed by Ulster Architectural Heritage with the Department for Communities. Trends identified by the Heritage at Risk register can help to direct individuals, groups, funders, and central and local government to target re-use, regeneration and repair works towards heritage need. It also serves to inform wider heritage policy and identify issues affecting heritage, which need to be addressed and prioritised.

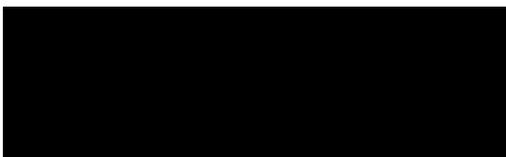
In recognition of the importance of targeted action for the historic environment and buildings at risk, a measurable objective was included in the Northern Ireland Programme for Government, (PfG) 2008-11. This set a target of 200 removals from the HARNI register, between 2006-16. Almost achieving the target set, 192 buildings were removed from the HARNI register.

UAH strongly recommends that a standalone target for saves or removals from the heritage at risk register, an indicator of achievement for restoration and reuse is established by Fermanagh and Omagh, and indeed all 11 councils within Local Development Plans. Should Fermanagh and Omagh District Council require advice on developing such a target, please do not hesitate to contact UAH, or the Department for Communities.

The historic built environment does not simply represent Fermanagh and Omagh's important past, it is the foundation for its future. Without proper management of heritage through the Local Development Plan, Fermanagh & Omagh's irreplaceable heritage asset and associated tourism draw will be lost. Most strikingly, this draft is seen to diminish and cut across the existing policy PPS6, for the protection of built heritage.

In summary, this plan proposes a framework that may be set to fail our important heritage assets and their potential value for the next 15 years. Ulster Architectural Heritage asks that significant changes are made to this draft Local Development Plan in response to the above concerns raised.

Yours sincerely,



Nicola McVeigh

Chief Executive

On Behalf of Ulster Architectural Heritage.

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