



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

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**FERMANAGH AND OMAGH DISTRICT COUNCIL**

**LOCAL DEVELOPMENT PLAN**

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Consideration of Representations Received  
to the Preferred Options Paper

**October 2018**

## **1.0 Introduction**

- 1.1 Following consultation on the Preferred Options Paper in October/November 2016, a Public Consultation Report was published in February 2017 which summarised the key findings arising from the representations submitted by the public, statutory consultation bodies and from the public workshops and meetings with under-represented groups. The paper indicated that there were a number of key areas or issues which needed to be considered and addressed when preparing the draft Plan Strategy.
  
- 1.2 This paper sets out the Council's consideration and response to the key issues identified and therefore provides an understanding of how the draft Plan Strategy has evolved.

	<b>Issues</b>	<b>Consideration</b>
<b>General</b>	Should pursue a more co-ordinated multi-disciplinary approach to land use planning.	A Project Management Group, representing multiple disciplines, have worked alongside and been consulted by the LDP Team throughout the process.
<b>Vision</b>	<p>The vision needed to be locally distinct/less vague, reflecting the unique characteristics of FODC</p> <p>Protection of the natural environment including landscapes, open space, recreation, energy efficiency measures, renewable energy, the two main towns being unable to cluster, sustainable and using active travel.</p>	An amended vision was agreed to reflect the issues pertaining to Fermanagh and Omagh and in that regard is locally relevant. Paragraphs 4.2-4.5 of the POP set out the initial vision and extrapolated upon it. The issues identified in representations in relation to the natural environment, open space and recreation facilities and climate change are addressed within this. Whilst the vision has been amended this extrapolation has been carried forward into Part 1 of the draft Plan Strategy. The issues identified above are specifically addressed in LDP Plan Objectives and Draft Policy context, justification and clarification.
<b>Objectives</b>	<p>There were a number of comments in respect of the order of the objectives and suggestions that environment should sit above economic; social above environment and economic etc.</p> <p>A number of alternative wordings were presented in respect of protecting the existing business base, encouraging new start-ups, seeking sustainable forms of development and having a presumption against fracking.</p> <p>The term development should be broken down into different types of development as lumping the term together does not serve the objective of getting a locally appropriate Plan.</p> <p>There should be a further objective to steer development to less environmentally sensitive areas (including habitats and species).</p> <p>Overarching principles should include the adoption of the precautionary principle in respect of development proposals where significant environmental, including health, implications are involved.</p> <p>Considers that the objectives do not go far enough in terms of climate change mitigation and adaption (only references to meeting Climate Change targets).</p> <p>Within the vision and strategic objectives there is a need to protect and enhance the identified centres within the designated hierarchy as a specific objective within this section of the Plan.</p>	<p>The SPPS is clear that it does not seek to promote any one of the three pillars of sustainable development over the other. Furthering sustainable development means balancing social, economic and environmental objectives, all of which are considerations in the planning for and management of development. The SPPS also sets out that in formulating policies and plans and in determining planning applications planning authorities will also be guided by the precautionary approach that, where there are significant risks of damage to the environment, its protection will generally be paramount, unless there are imperative reasons of overriding public interest.</p> <p>The wording of the objectives was considered and a number of minor changes were made. Mineral exploration is currently provided for under Part 16 of the Schedule to the Planning (General Permitted Development) Order (Northern Ireland) 2015 (GDPO) which is under review by the Department for Infrastructure. Where exploration, including that for hydrocarbons, is considered to go beyond Permitted Development, it will be subject to the policy tests within Draft Policy MIN01 which include criteria on the natural environment, public safety and human health, the landscape and visual amenity and the water environment.</p> <p>The meaning of development is defined in legislation and therefore it would not be appropriate for the term to be broken down into different types. However, there are policies specific to different types of development within the Draft LDP Strategy.</p> <p>It is considered that Environmental Objective 13 sufficiently addresses the need to conserve, sustain and protect sites of environmental importance including habitats and species. Additionally the draft policies NE0, 02 &amp; 03 Protected Species and their Habitats is considered to be a proactive way to protect important local, international and European sites, species, habitats and biodiversity.</p> <p>Following amendment of the objectives and identifying the need for policies which are applicable to all types of development it was decided that there was no longer a need for overarching principles.</p> <p>The reference to climate change target remains within Environmental Objective however policies within the LDP such as Flood Risk Management deal with mitigation and adaptation.</p> <p>Objective 2 sufficiently addresses the need to protect and sustain the role of identified centres/local towns and villages and the shops and services which exist within them. Additionally, the town centre and retail policies seek to achieve this objective.</p>
<b>Spatial Growth Strategy</b>	<p><b>Settlement Hierarchy</b></p> <p>Killyclogher was suggested as a village, with the boundary being defined by the townland of Killyclogher.</p> <p>Representatives of the DRCs identified under the Fermanagh Area plan “strongly contend that they have as much right to be considered as a settlement as many of those areas that have been designated as settlements in the proposed settlement</p>	<p>Killyclogher is contiguous with and therefore indistinguishable from Omagh. This does not detract from the Killyclogher ‘community’.</p> <p>None of those proposed as small settlements were considered to meet the criteria for small settlements. Assessment of Cavanaleck/Cran established that it is rural in nature and indistinguishable from other areas of the countryside. Designating Cavanaleck/Cran as a small settlement would also have the potential to mar the setting of Fivemiletown which is within the Mid-Ulster District Council area.</p>

<p>hierarchy". 'Settlement appraisals' have been completed for a number of the DRCs. Separate representations refer to the following as potential small settlements: Mullaghduin, Boho, Cooneen/Coonian, Cashel, The Knocks and Cavanleck/Cran.</p> <p>In respect of Cavanleck/Cran a separate representation requested an extension to the settlement limit of Fivemiletown to be extended to the golf course to allow for relaxation of the restricted route policy.</p> <p>Comments were made in respect of a number of settlements, vacant and historic environment sites which would benefit from regeneration efforts.</p> <p><b>Spatial Growth Options</b>  Preference for option 2 was cited as the decline of rural development would have a negative impact on local communities and lead to closure of local schools, shops, Doctors Surgeries and other essential services. Centralisation of the population will further reduce the services available to rural communities. Housing allocation should be proportional to the existing distribution of housing across the district as per option 2 in order to minimise travel and transport impact among communities/extended families.</p> <p>Preferred option 3 for the spatial growth strategy is considered a sustainable option where the higher order centres of Enniskillen and Omagh continue to provide the focus of main shopping needs. Growth within the defined town centre boundaries of the small towns and villages should be appropriate in scale and should not undermine the role and function of the main towns.</p> <p>There is a need to strike a balance between urban growth and rural regeneration. It is unrealistic to split urban and rural housing allocations in a district such as FODC.</p> <p>FODC ought to investigate rural living alternatives which are proving to be successful e.g. Leitrim "organic county", sustainable villages such as Cloughjordan.</p> <p><b>Housing Allocation</b>  FODC should be more ambitious in its approach to accommodating housing growth within the two main hubs and on previously development land, and particular as the RDS advocates a 60% target. Advocates a sequential approach to the allocation of housing land and with brownfield land prioritised. Also notes the brownfield land are often havens for wildlife.</p> <p>If housing development is going to be curtailed in the countryside in the future then villages and small settlements should be allowed to grow along with additional services such as schools.</p> <p><b>Economic Land Allocation</b>  Economic land allocations must be generous and not based on a formulaic approach. There is no downside to 'overzoning'. There was also a call for economic development to be facilitated more along the main transport routes. Others have disagreed with that approach, specifically in relation to the proposed A5 route.</p> <p>Both general and settlement specific comments were received in relation to enabling economic development in local towns which are accessible and are already centres of employment.</p>	<p>This will be considered at the Local Policies Plan Stage and in consultation with Mid Ulster District Council.</p> <p>This is a matter for Local Policies Plan Stage.</p> <p>Option 2 would be contrary to the RDS and would place greater demand on services and infrastructure to serve a more dispersed population.</p> <p>Option 3 is the Council's preferred option within the Preferred Options Paper.</p> <p>The Spatial Growth strategy is fundamental to achieving sustainable development and it is therefore necessary to allocate housing across the settlements and the countryside.</p> <p>At this time there is no identified need for an additional settlement within Fermanagh and Omagh. This does not limit rural communities from utilising sustainable living practices.</p> <p>The Council recognise the potential for accommodating housing growth on previously developed land. This is reflected in the Strategic Policy 03: Strategic Allocation and Management of Housing Supply as well as policy HOU01 Housing in Settlements.</p> <p>Villages and small settlements have existing capacity to accommodate future development needs including services where a local need arises.</p> <p>The role of the LDP is to ensure that there is an ample supply of suitable land available to meet economic development needs within the plan area, and should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity. Accessibility is a consideration in locating economic development. Overzoning has the potential to result in less sustainable development.</p> <p>Noted. The LDP will provide for Industry and Business within the settlements and countryside, subject to criteria.</p> <p>The protection of the natural environment is a material consideration in processing planning applications both within settlements and in the Countryside. This will be reflected in Natural Environment policies within the Plan</p>
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	<p>The environment should be the over-riding factor when allocating land for economic development. The Plan should instruct that land will not be allowed for industrial development in the countryside where there is a risk that it could adversely affect an environmentally sensitive area, water or air purity, farming or a tourism resource.</p> <p>Jobs of any sort are needed in the Council area not a range of jobs. Targets are required for economy, broadband connectivity, no. of tourists, environment i.e. reduction in GHG emissions – all objectives need to be made SMART or left out.</p> <p>They consider there is a clear requirement for IT/Service based roles.</p>	<p>Strategy. The protection of Tourism Assets will also be reflected within the Plan Strategy. Industry and Business land will not be allocated in the Countryside. However, policy provision will be made to allow for Industry and Business uses in the countryside subject to criteria.</p> <p>The LDP objectives to achieve the LDP spatial vision provide the broad direction for the spatial approach and individual policies within the Plan Strategy. Monitoring Indicators will enable the effectiveness of the LDP policies against the objectives.</p> <p>The LDP is required to ensure there is an ample supply of suitable land available to meet economic development needs within the plan area. Where this has been provided LDP policies in relation to economic development and public utilities will enable. Whilst the LDP provide policies to enable development, capital investment in infrastructure is outside the realm of the LDP.</p>
<b>Development in the Countryside/Sustaining Rural Communities</b>	<p>The evidence base for the identification of Rural Protection Areas was queried with some arguing that the existing policy framework within PPS21 made adequate provision for new development in the countryside. Identified need to sustain rural communities and address the issue of the decline in rural population and the loss of young people away from the rural area. Views that there is a need to manage the rural landscape and make it more vibrant alongside a view that the integrity of the countryside should be protected for future generations.</p> <p>Specific issues related to single houses in the countryside – particularly houses on a farm, the criteria for replacement dwellings and houses for non-farming rural dwellers, Dispersed Rural Communities, affordable housing, the regeneration of rural areas and a call to enable 'good sites' to be taken forward where they do not meet the cluster test. There is a skewed interpretation for sustainable which needs to be corrected in relation to sustaining rural communities.</p>	<p>The viewpoints expressed in relation to the designation of Rural Protection Areas were taken into account and it was decided to not proceed with this Option. Instead the Council looked to the existing provisions within the SPPS, with reasonable variations to these suggested in representations to the Preferred Options Paper considered such as regeneration efforts, considering those historical housing sites which do not meet the current replacement tests and existing sites with good integration and no impact on rural character.</p> <p>Other suggestions, such as providing for more than one opportunity for a dwelling on a farm within a ten year period was considered and set aside given the large number of farms within Fermanagh and Omagh and the potential for this to impact significantly on the spatial growth strategy for the plan area. Sustaining Rural Communities relates to enabling appropriate forms of development which ensures that these communities are sustained. It does not imply that they should grow.</p>
<b>Economic Development</b>	<p>Sustainable, sensitively located economic growth/development and industry should be supported within the villages, small settlements and countryside as well as the two main towns to assist with sustainable job creation. This should be facilitated through the revitalisation of some of the smaller settlements and through the creation of rural business hubs with accommodation and good digital connectivity in the countryside and which have long term benefit for local communities.</p> <p>Consultation identified that previous economic development land allocations should be reviewed, including the availability of it and access to it, and that zonings should enable industry and business beyond the traditional manufacturing sector.</p> <p>General consensus that the FODC area needed to become more connected, both physically in terms of the road network and digitally, in order for it to advance in terms of Economic Development, Industry and Commerce.</p> <p>LDP should provide serviced sites to facilitate world leaders in the manufacture of quarrying equipment and spin off companies.</p>	<p>Policy has been taken forward to enable Industry and Business in the main towns, villages, small settlements (draft policy IB01 Industry and Business Development in the Settlements) and in the countryside (draft policy IB04 Industry and Business Development in the Countryside and draft policy IB05 Farm Diversification).</p> <p>Draft policy RCA01 Rural Community Areas provides for small-scale, rural start-up projects subject to criteria. It is clarified that examples of this include workspace/start-up units and community /social enterprise. There are other policies within other subject areas which are considered to enable other forms of industry and business.</p> <p>These matters will be addressed at Local Policies Plan Stage.</p> <p>Noted. The LDP will bring forward policies to enable the associated infrastructure.</p> <p>Land zoned for Industry and Business will be identified at Local Policies Plan stage.</p>
<b>Mineral Development</b>	<p>Strong objection to unconventional hydrocarbon extraction and gold mining, specifically in the Sperrin AONB, was expressed alongside the request for an increase in those areas where mining would be subject to further control or requesting an entire ban on fracking within the FODC area. Concerns related to impact on the economy including tourism, human health and natural environment including landscape/AONB. It was</p>	<p>The 15 year period limit for planning permission for minerals is linked to the 15 year period associated with the, yet to be enacted legislative provision, under Schedule 3 Periodic Review of Old Mineral Permissions of the Planning Act (Northern Ireland) 2011 which sets the first review date falling 15 years from the grant of planning permission. There is no basis for reducing this period to 5 and therefore could be considered unsound.</p>

	<p>argued that planning permission should be limited to 5 years – not the 15 years set out in the Preferred Options Paper. Restoration should be the responsibility of the mineral industry and not the taxpayer.</p> <p>Conversely portions of the mineral industry and the Department for the Economy’s (DFE) Minerals and Petroleum Branch opposed the Council’s preferred option, suggesting that the evidence base was lacking, and queried the proposed areas of constraint and the proposed 15 year limit to planning permissions for mineral extraction. The lack of information in relation to safeguarding undermined the LDP process. The value of the mineral and aggregate industry to construction and local economy was emphasised. Applications for mineral extraction should be assessed against policy for each mineral and areas of constraint according to mineral type. It was also suggested that the nature of the reserve and industry should be a consideration in identifying safeguarding areas and recommend consultation with Geological Survey NI (GSNI) in doing so. They did not consider the Council’s topic paper on landscape character assessment to be sound evidence and opposed any policy that would introduce a prejudicial constraint to mineral extraction in the Sperrin AONB.</p> <p>The environmental benefits of the restoration and monitoring of sites provides environmental benefits, including to biodiversity.</p> <p>Areas to be considered for designation as Areas of Constraint to Mineral Development were suggested including any areas near to settlements or housing, schools, rivers, water catchments, reservoirs or drinking resources as well as areas identified for protection of the natural, built or cultural environment. The Councils with a share in the Sperrin AONB should work together/ have a similar planning approach to it.</p>	<p>The Council noted the concerns raised as being valid material planning considerations which should be included as tests within policy.</p> <p>Policy MIN01 – Mineral Development which addresses natural environment; landscape and visual amenity; the historic environment, the water environment; public safety, human health and amenity of people living or working nearby; and road safety and convenience of road users. Policy TOU01 – Protection of Tourism Assets and Tourism Development states that “the council will not permit any form of development that would...have an adverse impact on the intrinsic character or quality of a tourism asset...or diminish its tourism value.”</p> <p>Following consideration, the Council concluded that there was a lack of robust evidence available upon which to base safeguarding designations. With this in mind the designation of mineral safeguarding areas should be taken forward at the time of the Local Policies Plan. Policy MIN03 Mineral Safeguarding Areas indicates that Mineral Safeguarding Areas will be defined at LPP stage and identifies those types of development which would be exempt from the safeguarding policy.</p> <p>This is in line with the Council’s Preferred Option and is reflected in Policy MIN02 Restoration and Aftercare.</p> <p>Whilst it is reasonable to identify ACMDs for those areas ‘designated’ for environmental protection there is no evidence to support the broad brush exclusion of any areas near to settlements or housing, schools, rivers, water catchments, reservoirs or drinking resources. As above, Policy MIN01 – Mineral Development addresses natural environment; landscape and visual amenity; the historic environment, the water environment; public safety, human health and amenity of people living or working nearby; and road safety and convenience of road users. The Policy Clarification for MIN 01 states that Areas of Constraint on Mineral Development protect our most valuable and special landscapes, which are also important to tourism and recreation, from the effects of further mineral development.</p>
<p><b>Renewable Energy</b></p>	<p><b>Overarching Policy for Renewable Energy</b></p> <p>There was large scale support for the Council’s Preferred Option for Renewable Energy Development which was to retain existing policy provisions whilst protecting sensitive landscapes, with some suggesting increasing the areas considered sensitive to wind energy development. Others emphasised that the SPPS adopts a cautious approach to renewable energy developments rather than a presumption against such proposals – this is a point the renewable energy industry also made. A robust evidence base was required in order to demonstrate that no further capacity remained. The Renewable Energy Industry did not support the preferred approach and reference was made to UK and NI targets. The Council were encouraged to recognise the advantages of re-powering existing renewable energy sites. The economic benefits including employment of wind energy developments were not fully reflected in the POP.</p> <p>In line with Option 1, a number of areas were suggested as Areas of Constraint for Wind Development.</p> <p>There was a large body of representation from individuals and groups raising concerns about the potential impact of wind turbines, expressing strong opposition to further wind energy development. A significant number of these referenced the Sperrin AONB and its historic, environmental and landscape quality and were concerned about the impact of wind farms.</p>	<p>Given the comments received relating to the need for a robust evidence base in order to demonstrate that no further capacity remained and those in relation to particular landscapes such as the Sperrin AONB the Council Commissioned a Wind Energy Capacity Study. The Wind Energy Capacity Study sought to identify those areas with remaining capacity to support wind energy development and any that had no remaining capacity. These findings have been carried forward into a Wind Energy Strategy as part of the Plan Strategy which is the main material consideration in assessing applications for wind energy proposals including single wind turbines.</p> <p>The Council considered the comments in relation to re-powering, related infrastructure, health implications, residential amenity, service areas and sought to address these issues within policy. Policy RE01- Renewable and Low Carbon Energy Development stipulates that all proposals for wind energy development including single turbines and wind farms, extensions and re-powering will be required to comply with the guidance set out in the Fermanagh and Omagh Wind Energy Strategy and demonstrate a number of criteria.</p>

	<p>Applications for wind energy should include associated infrastructure such as substations and also a need to protect service areas for wind farms. There is a need for community/social benefits arising from wind farms. Distance from residential properties should be in policy. Electromagnetic fields should be considered as well as health implications of wind energy.</p> <p><b>Integrated Renewable Energy and Passive Solar Design</b></p> <p>There was agreement with the Council's Preferred Option for addressing Integrated Renewable Design and Passive Solar Design. Clarification was sought in regard to the thresholds and types of development. It was put forward that these matters are already covered by Building Regulations. Caution should apply when dealing with historic traditional buildings or historic areas.</p>	<p>The Council noted the general support for this approach, the clarification sought in relation to thresholds and types of development and the impact Building Control regulations have in respect of energy efficiency. There was a difficulty in agreeing thresholds in this respect. A higher level requirement for energy and resource efficiency for all development proposals was identified (which could include integrating renewable energy technology including micro-generation and PSD) alongside recognition of the need to minimise the impact of development on the environment and this was included as a criterion under Policy DE02 – Design Quality that development proposals are energy and resource efficient and minimise their impact on the environment.</p>
<b>Tourism</b>	<p>There was some concern expressed in relation to the Option presented in relation to Overarching Tourism which sought to identify conservation zones to protect recognised/important tourism assets within the District as it would exclude wind energy development. The evidence base for doing so was queried. Historic Environment Division recommended compliance with the SPPS in carefully considering the development of tourism facilities in order to protect and conserve heritage assets.</p> <p>Tourism Conservation Zones, Opportunity Zones/Visitor Hubs need to be carefully chosen with others seeking more clarity on proposals beyond visitor hubs.</p> <p>Tourism development strictly controlled in and around the lough shore, unless small in scale sustainable development. Account should also be taken of impacts on the historic environment. Tourism can have a negative effect on biodiversity, eg. wetland dwelling birds.</p> <p>A number of areas/locations were identified as areas to develop tourism. Some commented that small scale tourism projects could be used to sustain rural communities. Eco villages should be developed and used in relation to tourism activities and visitor hubs. The need for dedicated coach parking in Omagh and Enniskillen was identified.</p> <p>Need sustainable rural tourism strategies as opposed to harmful industrialisation. The Sperrins AONB must be better utilised in terms of tourism. Access to several archaeological sites in the Sperrins AONB needs to be improved and these sites developed for tourism or educational purposes. There are many other walking/cycling routes which could be developed in the area.</p>	<p>Following consideration of the responses to the POP it agreed that there was a lack of evidence to support the preferred option. A policy will be taken forward with the LDP which does not preclude development only that which would have an adverse impact on the intrinsic quality or character of a tourism asset. In considering this a need for a policy to protect existing tourism development was also identified.</p> <p>The LDP will not be bringing forward Tourism Conservation Zones or Opportunity Zones. Tourism hubs will be defined in the Plan Strategy but not identified or delineated on a map.</p> <p>It is proposed to carry forward the existing SCA designation around the Lough Shores. Historic and Natural Environment policies will be taken forward within the LDP and will be a material consideration.</p> <p>Noted.</p> <p>There is no identified need for a new settlement within the District. Coach parking will be considered at Local Policies Plan Stage.</p> <p>Fermanagh and Omagh District Council are currently collaborating with Causeway Coast and Glens, Derry City and Strabane and Mid Ulster Councils to address a range of themes across the Sperrin AONB.</p>
<b>Supporting Good Design and Placemaking</b>	<p>There was support for the preferred option which was to provide design/positive place making criteria for development and additional criteria for designations should as AONB, Conservation Areas and Areas of Townscape/Village character. Others did not agree with the preferred option as this would place further restrictions on types of development, such as wind energy. The need to meet the changing needs of the population, particularly the elderly was raised.</p> <p>Some individual responses called for a design guide for the Sperrin AONB in conjunction with other 'AONB' Councils whilst a number of industry responses set out that the AONB is already subject to additional scrutiny. Other areas were identified as requiring supplementary design guidance. Signage should be branded to reflect the tourism product on offer. A management plan is required for the AONB. Concern about the industrialisation of the AONB impacting upon the natural and cultural heritage of the AONB. The AONB should be designated as a Gaeltacht area with signs in both Irish and English.</p>	<p>It was considered that the policy approach going forward should seek to secure a high standard of design and to create a sense of place. Additional criteria (as suggested in the Preferred Option) in relation to designations are better considered at a later stage in the LDP process, whilst placing a general (criterion based) requirement on developers to protect and enhance features and assets of the natural and historic environment and landscape with Policy DE02 Design Quality. It was agreed that design plays an important role in meeting the changing needs of the population. This is also reflected in DE02 – Design Quality where development proposals are accessible to all and incorporate design measures to provide adaptable accommodation and reduce social exclusion.</p> <p>The need for a design guide for the Sperrin AONB will be considered later in the LDP process. Fermanagh and Omagh District Council are currently collaborating with Causeway Coast and Glens, Derry City and Strabane and Mid Ulster Councils to address a range of themes across the Sperrin AONB.</p>

	Key sites within the two main towns need to be identified.	This a matter for Local Policies Plan stage.
<b>Carried forward policies</b>	<p>FODC must address the impact of BREXIT on environmentally sensitive areas and areas of archaeological interest.</p> <p><b>Telecommunications/Connectivity:</b> Connectivity needs to be improved to support the local economy, including agriculture. Broadband provision and related download speed is a problem in rural areas, with certain areas being named. Telecommunications service could be delivered in existing service ducts and lines with no new infrastructure. Telecommunications masts should not be sited in AONBs or ASSIs or near residential homes.</p> <p><b>Historic Environment:</b> The extensive range of archaeological monuments in the Sperrins are cited with multiple examples referenced. Areas are also identified for consideration as an Area of Special Archaeological Interest and an Area of Archaeological Potential as an extension or part of the existing Beaghmore ASAI. Townlands are referenced</p> <p>Plantation dwellings/big houses should be given the recognition they deserve. Indigenous architecture, examples of local architecture using stone and vernacular design from the 19<sup>th</sup> century and earlier must also be given the protection they merit.</p> <p>Concerns was cited in relation to specific sites. Districts Heritage Assets are a finite and valuable resource, and that their loss would be detrimental for local communities and Northern Ireland's wider Brand Image.</p> <p><b>Natural Environment:</b> The landscape capacity assessment and development pressure carried out by FODC is not a reliable evidence base. Proposed Special Countryside Areas should have regard to the existing designations and in particular to the extent of the AONB designation. Small scale development should be considered within SCA where it can demonstrate that it is sensitive to the landscape and sustainable, with not detrimental effects on the environment. FODC should carefully consider whether any further controls are required within the AONB. There is a need to develop an AONB in Fermanagh Lakelands and the Geopark.</p> <p>Biodiversity and our most important landscapes should be protected from inappropriate development. The value of the Owenkillew and Owenreagh Rivers (SAC/ASSI) in providing habitats was noted. Concerns for wildlife and for human health stemming from goldmine and wind turbines. Potential impact on sensitive sites which include species and habitats.</p> <p>Concern that the Habitat Regulations Assessment is yet to be produced.</p> <p>Potential Local Landscape Policy areas were identified.</p> <p><b>Transportation:</b> Maintenance of rural road networks should be prioritised particularly with regard to the aging population and their ability to access medical and other facilities.</p> <p>The approach to Protected Routes should be relaxed.</p> <p><b>Retail:</b> Addressed the requirement to carry out a retail capacity study as part of plan preparation. Site should be designated as suitable for retail development in the LDP.</p>	<p>The impact of Brexit is not yet known as such the Plan Strategy is unable to address these.</p> <p>The role of connectivity has to play in supporting the local economy is acknowledged, as the fact that more remote, rural parts of the Council area suffer from poor access to high speed broadband and deficiencies in mobile broadband coverage. In keeping with the SPPS, the Council will facilitate telecommunications growth which leads to improvements in these areas whilst keeping the environmental impact to a minimum. Draft policy will include criterion in relation to sensitive locations, features and receptors.</p> <p>Historic Environment Division were advised of the request for inclusion of areas/townlands within ASAI's and APP's. They advised the LDP Team of the candidate ASAI's ratified by the Historic Monuments Council to be taken forward in the Plan Strategy. These include an extension to Beaghmore ASAI and a new ASAI at Creggandevsky. The relevant policy is HE02 –Archaeology.</p> <p>There are a range of policies within Historic Environment which may apply, including those dealing with Historic parks, gardens and demesnes, and policy in relation to unlisted locally important or vernacular buildings.</p> <p>The strategic nature of the Plan Strategy does not address specific examples, however then Plan Strategy includes policies to address the Historic Environment.</p> <p>Following consideration of representations made to the Preferred Options Paper the Council commissioned a Review of the Landscape Character Assessment and a Wind Energy Capacity Study to further inform policy direction for the Plan Strategy. Areas of High Scenic Value (AoHSV) and Special Countryside Areas (SCAs) will be identified in the Plan Strategy.</p> <p>Noted. The Plan Strategy will bring forward policies in relation to sites designated for the protection of species/habitats. Policies in relation to mineral extraction both address human health. Overhead electricity lines are dealt with under policy PU02, which requires that the avoid sensitive features and locations.</p> <p>The HRA will accompany the Draft Plan Strategy.</p> <p>This is a matter for Local Policies Plan Stage.</p> <p>Noted. The Plan Strategy will bring forward policies in relation to transportation and telecommunications to facilitate appropriate development. DFI also intend to bring forward a Local Transport Strategy for the Council area.</p> <p>Protected Routes are identified through a legislative process and are based on road safety. The draft policy will include exemptions.</p>



<p><i>Thresholds for Retail Impact Assessment</i> - This is an issue to address through the plan process and supported by evidence before setting a specific threshold. The figure of 1000 sq m is an historic arbitrary figure no longer based on evidence. This an inappropriately high figure for the Fermanagh and Omagh District Council area which would enable large scale units of up to 999sq metres to be promoted within the smaller towns and villages thereby damaging the vitality and viability of the main town centres. Others agreed with this threshold.</p> <p><i>Extending the town centre boundary of Omagh</i> -In the absence of a robust retail capacity study, the Council is not in a position to address this. On the basis of current information, recommends no change in the town centre boundary.</p> <p><i>Location of a Primary Retail Core in Omagh</i> -Boundaries were proposed for Primary Retail Core.</p> <p><i>The approach to be taken to opportunity/vacant sites in Enniskillen and Omagh</i> Their site should be identified as an opportunity site suitable for a mix of uses including retail development.</p> <p>Due to the limited size of Enniskillen and Omagh it is not appropriate to designate further local centres within these towns. The focus should be on directing development and occupiers to opportunities within the defined town centre to deliver town centre regeneration and address vacancy rates.</p> <p><b>Housing:</b> There is no mention of the provision of facilities, housing or halting sites for Travellers.</p> <p><b>Public Utilities</b> Waste water treatment is a fairly significant constraint and seeks further clarification on the timing of capacity improvements in settlements.</p>	<p>A Retail and Leisure Commercial Needs Assessment was commissioned by the Council to support the LDP evidence base.</p> <p>The threshold set out in the SPPS is 1000 square metres. Arising from the Retail Capacity Study it was considered that given the size of the town centres within Omagh and Enniskillen it would be appropriate to bring forward a policy test requiring a threshold of 500 square metres for all applications including extensions for retail development and town centre uses outside the Primary Retail Core.</p> <p>No change to the existing town centre boundaries are proposed.</p> <p>The proposed Primary Retail Core for Enniskillen and Omagh were identified following analysis of town centre landuse mapping.</p> <p>This is a matter for Local Policies Plan stage.</p> <p>Local centres provide an important, accessible source of convenience shopping and services to local communities. However, it is important to limit their potential impact on town centres. The Plan Strategy will include a policy in respect of Local Neighbourhood Centres which will include criteria to limit the gross floor space of proposals and require that there is no adverse impact on town centres.</p> <p>The existing policy provision for Traveller Accommodation was amongst those proposed to be carried forward in the Preferred Options Paper (paragraph 12.24). Policy HOU04-Traveller Accommodation addresses this issue within the Plan Strategy.</p> <p>NI Water are the responsible authority for managing the need for and timing for any capacity improvements to WWTWs.</p>
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