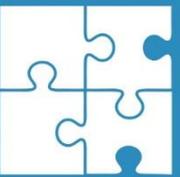


FODC705

# Local Development Plan 2030 Preferred Options Paper

## Public Consultation Report – February 2017



**Purpose:** To inform the Council of the findings of the Preferred Options Paper public consultation exercise carried out with Statutory Consultation Bodies, Section 75 Groups and members of the public.

**Content:** The paper provides a summary of:

- i. The key findings of the public consultation with statutory consultation bodies;
- ii. Representations received from members of the public, including questionnaires; and
- iii. The key findings through public workshops and meetings with under-represented groups.

## **1.0 Introduction**

- 1.1 The purpose of this paper is to inform Council of the responses made to the public consultation exercise which commenced on 3<sup>rd</sup> October 2016 and ended on 28<sup>th</sup> November 2016. The exercise was carried out jointly with Community Plan who were consulting on their draft Community Plan. This was considered appropriate in light of the statutory link between the Community and the Local Development Plan (LDP) and the requirement for the LDP to take account of the Community Plan.
- 1.2 In the four-week period prior to the consultation launch date, pre-consultation was undertaken via 'pop up shops' at a range of public venues, a poster and leaflet campaign, distribution of four newsletters at a range of venues and via an email information drop. These engagement methods were wide ranging in order to help raise awareness of the two documents, and to encourage participants to actively engage in the consultation process and make their views heard through either attending a series of 13 public workshops or responding online, or via email or post.
- 1.3 Participation during the engagement process was good although it was noted that the level of attendance at the public workshops varied greatly. In total, 1,455 people engaged in the public consultation process, of which 893 submitted a representation within the consultation period. This can be broken down as follows:

Engagement Method	Numbers	% of Overall participation
Public and S75 Workshops	562	38.6%
Online Questionnaire	48	3.3%
Postal Questionnaire	32	2.2%
Postal/Email Responses	798	54.8%
Statutory Consultee Responses	15	1.0%
<b>Total</b>	1,455	100%

It should be noted that site specific representations e.g. requests for inclusion of land within settlement limits are not included in this report but will be held over and considered at the draft Local Policies Plan stage.

- 1.4 In accordance with the requirements of Regulation 10 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Fermanagh and Omagh District Council consulted with statutory consultees including government departments, neighbouring local planning authorities and statutory undertakers, of which 15 have responded. Their comments are summarised in more detail in Appendix 2. A detailed summary of the individual representations received from members of the public who responded to the consultation process is provided in Appendix 3. A large number of these were individually signed copies of letters relating to specific issues, primarily in relation to concerns regarding potential fracking, wind energy development, minerals development and other forms of development in the Sperrin Area of Outstanding Natural Beauty.
- 1.5 The report also summarises the key findings from the public workshop meetings and Section 75 group workshops.
- 1.6 The Preferred Options Paper was accompanied by a Sustainability Appraisal (SA) Interim Report. A summary of the comments received in regard to the SA are contained in Appendix 4.

## **2.0 Summary of Consultation Findings from Statutory Consultees**

- 2.1 The purpose of the Preferred Options Paper was to provide the public, stakeholders and interested parties the opportunity to put forward their views and influence the local development plan from the outset. To stimulate debate on a range of planning issues facing the FODC area, a number of suggested possible options or policy approaches on how to address these issues were put forward along with the Council's preferred option.
- 2.2 The representations received are considered against the vision and strategic objectives for the area; overarching principles; the spatial strategy and issues to be addressed in the LDP including sustaining our rural communities, tourism, minerals development, renewable energy and supporting good

design and place making. Comments on Carried Forward Policies and other strategic issues raised are also included. Any comments of a local nature or relevant to the Local Policies Plan, will be considered at that stage of the plan process.

- 2.3 It should be noted that the response from the Department for Infrastructure (DfI) was provided on the basis of comments from Planning along with specific comments from each of the non-planning business areas within DfI. These included: Transport Planning and Modelling Unit; Transport NI – Western Division; Public Transport Services; Rivers Agency; Water and Drainage Policy Division; and Crumlin Gaol and St. Lucia Team. As Rivers Agency did not specifically provide comment on the Preferred Options Paper itself, but rather set out what the Local Policies Plan will need to contain in respect of managing flood risk, their comments will be considered at the Local Policies Plan stage.

### **The Vision and Objectives**

- 2.4 The Preferred Options Paper set out a vision and a series of strategic objectives which were grouped under the sustainability themes of social, economic and environmental. Whilst the majority of statutory consultees responded positively to the wording of the vision, DfI Planning advised that it was not locally distinct and that it should reflect the unique characteristics of FODC. The Department for Communities' Ministerial Advisory Group (MAG) commented that it was brief and that more was required on Sustainability Transport and Active travel.
- 2.5 Most consultees were in general agreement with the objectives with only minor changes suggested in relation to specific wording. However, DfI Planning stressed the need to ensure that the objectives supported the achievement of the vision and are integrated/aligned with regional and local strategies and policies. They should also be capable of being delivered, measured and monitored. It was felt that the objective for housing had not addressed social housing need and homelessness, which were referred to in the Spatial Portrait. The Northern Ireland Housing Executive (NIHE) also felt there needed to be an acknowledgment of the need for affordable housing and provision of mixed tenures. Invest NI sought elaboration on how the target for 4,875 jobs was to be created and across which growth sectors.
- 2.6 DfI Planning also considered that an objective should be provided which references renewable energy and this was reinforced by renewable energy providers SSE Renewables, Gaelectric, ESB Wind Developments and RES Ltd who sought objectives which would include the contribution of renewable energy to meeting climate change targets as well as social and economic benefits in terms of jobs and opportunities, and delivery of local projects and recreation (through grant schemes).

- 2.7 DfI's Transport Planning and Modelling Unit advised - in reference to "Economic" objective (vi) which mentioned improving travel times - that they would not be seeking to improve journey times within settlements. Transport NI emphasised the need for Council priorities to align with the overall transport priorities for the region. Public Transport Services considered there was no evidence of prioritisation in the list of objectives or analysis of likely deliverability/costs.
- 2.8 DfI's Water and Drainage Policy Unit suggested that the principles of sustainable water should be considered in the vision and objectives. SONI supported and welcomed the strategic economic objective "(v) To accommodate investment in public utilities infrastructure and waste management". RES also considered that more amplification of the header text within the "Environment" strategic objective was needed in order to promote proactive development to tackle climate change e.g. the beneficial forms of development such as wind farms. Crumlin Road Gaol and St. Lucia Team suggested that Economic objective (viii) should include recognition of the leisure and tourism opportunities that exist in the FODC area.

### **Overarching Principles**

- 2.9 The Overarching Principles reflect the strategic direction of the LDP objectives, in line with the vision for the FODC area and the Community Plan, as well as providing a link with the strategic objectives and policies set out within the SPPS. DfI Planning has reminded the Council of the 5 core planning principles set out in the SPPS and that the LDP should align with these, particularly in regard to creating and enhancing shared space and preserving and improving the built and natural environment.
- 2.10 When referring to developer contributions, the wording should match that of the SPPS and the Council should also consider if this will apply to all development. Invest NI considers that such contributions should not apply to public sector developments where wider societal benefits are the driving force rather than profit. NIHE strongly supported the overarching principle on developer contributions adding that they should also apply to affordable housing.

### **Main Issue 1: Spatial Growth Strategy**

- 2.11 The LDP is required to contain a Spatial Strategy setting out the direction for the development and use of land for the period of the plan. The POP presented Spatial Growth Options and options for allocating housing across the settlement hierarchy and allocating economic development land. Comments on these were mixed with some consultees (e.g. Historic Environment Division) expressing agreement with the preferred option for Spatial Growth whilst others were quite negative. DfI Planning in particular expressed concern that there was insufficient distinction between Options 1 and 3. Transportation and Modelling Unit were concerned that growth outside

the towns/hubs, where there is little or no public transport services, would lead to accessibility being compromised. Option 3 did not appear to support sustainable transport. Transport NI advised that LDPs need to reflect the strategic roads programme and that appropriate consideration is given to transportation matters in the allocation of land for future development.

### **Main Issues 2 and 3: Housing and Economic Land Allocation**

- 2.12 There was also concern expressed by DfI Planning regarding the preferred option for the Housing Allocation as the proportion being allocated to the countryside appeared not to be consistent with regional policy nor addressed certain key trends within the Council area (that is, the growth of households in the countryside between 2001 and 2011). It was pointed out that policy proposals that aim to create a critical mass of population to support a level of services will raise challenges for service providers in meeting the needs of a spatially dispersed population.
- 2.13 NIHE commented that they would like to see a revised preferred option which includes ‘balanced growth across the small towns, villages and small settlements.’ Development in the countryside should be limited as it is not sustainable, arguing further in relation to the Housing Allocation that there should be more housing allocated to these settlements rather than to the countryside. MAG and NIEA also considered the Housing Allocation was unbalanced between the main hubs and the countryside. Gaelectric indicated that there should be more focus on the main hubs in line with the RDS, in order to allow the construction of houses close to existing services and infrastructure. SSE Renewables recommended that the spatial strategy should provide no form of moratoria on where onshore wind development can or cannot take place.
- 2.14 With regards to the allocation of economic land, DfI Planning emphasised the need to be consistent with other parts of the POP, and that the impact on environment, infrastructure and services should be adequately considered. NIHE disagreed with the preferred option arguing for a similar approach to their suggestion for the housing allocation. They also suggested that the Council consider the inclusion of simplified planning zones in Enniskillen and Omagh. In contrast, Gaelectric considered that the preferred option was a sensible approach, being weighted towards the hubs but not omitting rural areas.

### **Main Issue 4: Sustaining Rural Communities**

- 2.15 The preferred option for ‘Sustaining Rural Communities’ also received varied responses with the proposed designation of Rural Protection Areas (RPAs) and Special Countryside Areas (SCAs) receiving positive comments from NIEA and Invest NI but largely negative comments from the renewable energy providers, DfI Planning, MAG and NIHE. The main concern from DfI Planning and NIHE was the criteria for designating RPAs and the need to ensure that there is a robust evidence base to support them. DfI Planning questioned how

they would operate alongside the carried forward policies of PPS 21. Transport NI advised of the need to take cognisance of the standard of existing infrastructure.

- 2.16 The renewable energy providers were also concerned that the preferred option lacked an evidence base and would introduce a protectionist approach to development in the countryside, arguing that the existing policy framework (PPS 21) already makes adequate provision for new development in the countryside. Public Transport Services commented that a greater number of houses in rural areas has a cost consequence.

### **Main Issues 5 and 6: Economic Development, Industry and Commerce**

- 2.17 Options were presented separately to address deprivation/regeneration in rural and urban areas. In response to the preferred option for urban areas, DfI Planning observed that deprivation goes beyond accessibility and should include issues such as educational attainment and access to affordable quality housing. Both NIHE and HED agreed with the preferred option whilst NIEA sought a caveat to ensure that any environmental constraints are sustainably addressed.
- 2.18 In regard to the preferred option for addressing deprivation in rural areas, DfI Planning sought further clarification on the criteria that would be used for such a policy and reminded Council that options should be realistic and deliver the intended outcome. Neither NIHE nor MAG agreed with the preferred option and sought further clarification on RDAs etc. SSE Renewables endorsed the preferred option subject to their comments on Main Issue 4 and, along with Gaelectric, did not accept that SCAs should be carried forward as this would be too restrictive to wind energy development.

### **Main Issue 7: Minerals Development**

- 2.19 In the Council's preferred option, it was proposed that the current policy approach in regard to minerals development would be retained with additional controls introduced to protect sensitive landscapes such as AONBs (Areas of Constraint on Mineral Development) where proposed operations should be short term (less than 15 years) and, to identify areas of minerals safeguarding. In their comments, DfI Planning advised that it was important to demonstrate cross boundary working to demonstrate soundness. Comments received from the Department for the Economy's (DfE) Minerals and Petroleum Branch were not in favour of the preferred option. Whilst they welcomed Option 1 and the recommendation in Option 3 for safeguarding minerals in the plan area, the additional constraints proposed did not seem compatible with the SPPS. They also sought clarity on the evidence base for the proposed 15 year restriction on mineral development and that each planning application should be assessed on its own merits. The time limits appeared arbitrary and unnecessary.
- 2.20 They did not support additional constraints on mineral developments, in particular in relation to the UNESCO Geopark which they argued was not a

statutory designation and where the aim is to inform people about the sustainable use and need for natural resources, whether mined, quarried or harnessed while at the same time promoting respect for the environment and the integrity of the landscape.

- 2.21 DfE were also critical that the POP did not demonstrate sufficient knowledge or understanding of high value minerals and little information was provided on oil and gas. They commented that a distinction should be made between exploration for, and extraction of, unconventional hydrocarbons, such as shale gas, and conventional oil and gas which have different scales and methodologies and raise different sustainability issues. It was recommended that the Council further engage with DfE/GSNI. Supplementary information was provided by DfE to help better inform the Council about the types of minerals, their distribution and exploration techniques etc.

### **Main Issues 8 & 9: Renewable Energy**

- 2.22 Options were presented for an overarching policy for renewable energy and integrated renewable energy and passive solar design. Only NIHE, HED and NIEA agreed with the preferred option for renewable energy. DfI Planning commented that the strategic objectives should also reflect renewables and emphasised that the SPPS adopts a cautious approach to renewable energy development proposals within designated landscapes, rather than a presumption against such proposals. The need for a robust evidence base was reiterated, in particular, the need to demonstrate where there is no further capacity to accommodate wind energy developments in sensitive landscapes. Reference should be made to the NI Strategic Energy Framework (2010).
- 2.23 The strongest objections to the preferred option came from the renewable energy organisations, SSE Renewables, Gaelectric, RES Ltd and ESB Wind Developments. Their main concern was the proposed application of what was viewed as a 'blanket-wide' ban on new wind energy developments, on landscape and visual grounds, which was considered contrary to the SPPS, PPS 18, PPS 2 Natural Heritage and the RDS. Criticism was also made regarding the content of Position Paper 14 Landscape Character Assessment which was amplified further by SSE Renewables in their attached Appendices. The approach taken in the POP provided no potential for the individual circumstances of any particular case to be taken into account as part of policy. RES also had significant concerns with the baseline information used and the supposition that extant targets have been met. They draw attention to several different UK and NI targets which extend beyond the lifetime of the plan and would encourage the Council to consider more ambitious targets to help tackle climate change.
- 2.24 RES, in particular, would encourage the Council to adopt a more sustainable policy approach and to consider the relationship between their spatial growth strategy and energy consumption over the plan period. Along with SSE

Renewables and ESB Wind Developments, RES Ltd recommended that the LDP should embrace the advantages of Re-powering renewable energy projects (a concept supported in Scottish planning policy), support the co-location of other low carbon generation technologies, provide an enabling policy framework to assist further deployment of wind energy development and continue the policy approach set out in PPS 18.

- 2.25 In responding to the preferred option on integrated renewable energy and passive solar design, Invest NI sought clarification on the thresholds and types of developments which would be applied by the proposed policy approach, and considered that separate thresholds should apply for different types of developments. NIHE considered that the policy should apply to all developments, not just the public sector, and also sought clarification on the proposed thresholds.

### **Main Issues 10, 11, 12: Tourism**

- 2.26 The options for tourism covered an ‘overarching tourism option’, ‘operational tourism’ and ‘lakes and waterways’. DfI Planning considered that there needed to be a rethink on the ‘overarching tourism’ approach and how it read alongside the carried forward policies of PPS 16.
- 2.27 Gaelectric did not agree with the preferred option for ‘overarching tourism’ as this would introduce further landscape protections which would exclude wind energy developments. SSE Renewables and ESB Wind Developments also did not agree with the preferred option and felt that there was a need for a proper evidence base to identify the tourism zones. Tourism Conservation Zones should not be developed and instead a policy approach which recognises how recreation and tourism interests can be enhanced by appropriate development proposals should be progressed.
- 2.28 NIHE, whilst agreeing with the preferred option in principle, felt it conflicted with the proposed policy for RDAs. HED commented that careful consideration should be given to the development of tourism facilities in order to protect and conserve heritage assets and comply with the SPPS.
- 2.29 With regard to ‘operational tourism’, Gaelectric did not agree with the preferred option and considered that wind farms and tourism can coexist as demonstrated in Scotland. NIHE, although in agreement with the preferred option, considered that there may be potential conflict with the designations of RDAs, RPAs etc. NIEA supported the preferred option in principle but that the Tourism Conservation Zones, Opportunity Zones/Visitor Hubs need to be carefully chosen. Both Mid Ulster and Derry City and Strabane councils were supportive of the tourism options. DfI Planning commented that more clarity was needed for proposals beyond visitor hubs to conform to the tourism strategy.

- 2.30 In relation to 'lakes and waterways', HED agreed with the preferred option but added that account should be taken of impacts on heritage assets and their settings and shipwrecks, noting that 'Fermanagh has a huge corpus of freshwater archaeology including very many crannogs'. NIEA also supported the preferred option.

### **Main Issues 13: Supporting Good Design and Place Making**

- 2.31 NIHE, Invest NI, HED, MAG and NIEA, all supported the preferred option which aimed to take greater account of design and place making in designations such as AONBs, Conservation Areas and Areas of Townscape/Village Character. MAG offered additional points for consideration and further discussion such as the beneficial impacts of good standards of civic stewardships in areas of low employment/multi-deprivation. DfI Planning sought clarification on whether the issue had been considered within the context of the strategic objectives and overarching principles. NIHE advocated the use of the Lifetime Homes Standard, to provide housing suitable to meet the changing needs of the population, particularly the elderly.
- 2.32 Gaelectric, however, did not agree with the preferred option and instead argued that, as set out in the SPPS, the design of a development can minimise energy and water usage and CO2 emissions. They referred to wind farms and renewable energy projects which reduce CO2 emissions and that the option places further restrictions on these developments in areas such as the Sperrins, and that there was no need for supplementary design guidance for the AONB. Transport and Modelling Unit felt that an opportunity had been missed in addressing how transport can contribute to place making.

### **Carried Forward Policies**

- 2.33 Existing planning policies which are considered to be operating effectively, were set out within the POP, with the view that these would be carried forward into the new LDP Plan Strategy with minor adjustment. Any changes would not alter substantially the existing policy intent, but would better support and reflect FODC's LDP vision, objectives and overarching principles. Questions were also posed in relation to some of the policies/topics, to which most consultees responded.
- 2.34 DfI Planning advised that account should be taken of the strategic objectives and vision and to provide clarification on what assessment was undertaken of retained policies. All carried forward policies will be required to be assessed under the Sustainability Appraisal process.
- 2.35 Under Archaeology and Built Heritage, HED suggested sources of information to help identify candidate Areas of Significant Archaeological Interest (ASAI) and to inform ATCs and LLPAs. They emphasised the need for careful consideration of advertisements where they affect listed buildings and protected monuments etc. and also highlighted a number of matters as

potential policy gaps. Gaelectric's view was that the existing policies in PPS 6 and SPPS relevant to archaeology and the built heritage were working well. Mid Ulster commented that consideration should be given to linking with Beaghmore ASAI so that it extends into the FODC area.

- 2.36 NIHE welcomed the retention of PPS 21 and PPS 8 and that supplementary guidance such as Creating Places and DCANs should be retained in addition to Living Places and Building on Tradition. They suggested an amendment to the PED 7 of PPS 4 to allow for residential development on appropriate sites.
- 2.37 In relation to town centres, they suggested that vacant sites should incorporate town centre living initiatives e.g. LOTS. Invest NI considered that the town centre boundary in Omagh should be amended to exclude areas subject to flood risk and supported the re-use of buildings within settlements for modern business purposes.
- 2.38 In relation to Transportation, Transportation and Modelling Unit advised that the Sub Regional Transport Plan should be treated as the current transport proposals for the area until a new local transport study had been agreed for the area. Transport NI advised that bus routes/rail routes and general access to public transport should be reflected in the consideration of zonings within LDPs. Parking policies will be a key aspect of transport plans.

### **Other Strategic Issues**

- 2.39 SONI referred to their previous comments made in their pre-POP submission which provided information on the indicative nature and extent of future developments in the Council area. They also provided a suggested text for inclusion in the LDP which related to sustainable energy transmission and distribution infrastructure network, strengthening the Grid and the requirement of assessments to be carried out to avoid adverse environmental effects.
- 2.40 NIHE, in addition to their completed questionnaire response, provided a supplementary statement on aspects relating to housing including: - future proofing and design to minimise energy usage and CO2 emissions; protect and enhance the natural environment; high quality open space; connectivity; windfall sites and unzoned land. They also expressed disappointment at the lack of specific policies on housing issues.
- 2.41 Water and Drainage Policy Division commented that consideration should be given to the policy implications of Sustainable Water – A Long Term Water Strategy (LTWS) 2015-2040 when preparing the LDP to assist in working towards a sustainable environment.

### **3.0 Summary of Representations Received from Members of the Public**

- 3.1 There were 802 responses received from individual members of the public and stakeholders including representatives of public bodies or charities, and representatives of interest groups.
- 3.2 A number of the responses from members of the public can be grouped together and as they either follow the same or very similar format and content (and have clearly been organised as such). The discussion and summary of the main themes found in the responses are set out below and correspond with the topic headings and issues within the Preferred Options Paper (POP). Comments on Carried Forward Policies and other strategic issues raised are also included. Appendix 2 includes a more detailed summary of all of these responses.

#### **The Vision and Objectives**

- 3.3 In the main, and where commented upon, the Vision and Objectives of the POP were welcomed and supported by organisations such as Dalradian Gold Ltd and the Ulster Wildlife Trust and by some individual representations.
- 3.4 The Royal Society for the Protection of Birds (RSPB NI) however, considered the *Vision* vague and was unsure if it was appropriate to link the objectives of the Community Plan so directly with the objectives of the LDP; that the objectives do not go far enough in terms of climate change; and, that there should be a further objective to steer development to less environmentally sensitive areas. The Ulster Architectural Heritage Society (UAHS) suggested amendments to expand a number of the objectives to ensure they acknowledge the importance of heritage assets and their enhancement and protection. Inaltus (representing Fane Valley who have retail interests in Omagh) considered the vision to be underwhelming for retail in Omagh and instead promoted objectives that seek a minimum target for new retail floorspace in the town.
- 3.5 The Letterbreen and Mullaghduin Partnership (a group whose submission was supported by 296 individual letters) requested changes to the supporting text of the Vision (at para.4.4) and to seek further protection for biodiversity and, in addition, human and animal health from unconventional hydrocarbon exploration and extraction. They instead suggest a greater emphasis on energy efficiency measures. They also request minor changes to the wording of a number of the social and economic objectives.

#### **Main Issue 1: Spatial Growth Strategy**

- 3.6 A number of representatives are concerned that the Spatial Growth Strategy does not intend to continue with the Dispersed Rural Communities (DRC) policy/designations of the Fermanagh Area Plan 2007. They consider this will

disadvantage these areas (and as they would only now have a similar status to countryside). They query why some DRCs are not designated as Small Settlements. This point was included in comments from the Fermanagh Rural Communities Network, Trillick 2020 Community Development Group, and one individual response.

- 3.7 In a similar vein, comments from Broughderg Area Development Association and one individual response, note as positives the policies for development in the countryside for PPS 21 and that these should be continued although with more flexibility for non-farming rural dwellers. The Killyclogher and District Development Association and Killclogher GAA raise a concern that Killyclogher is not identified as a separate settlement to Omagh and instead should be a 'village' in its own right.
- 3.8 Very few responses expressed a comment on which option would be preferred. Two responses expressed support for the Council's preferred option 3 for spatial growth and with particular reference to the benefits for Omagh, Enniskillen and Dromore. One other response, while acknowledging broad agreement with option 3 as it ensures smaller settlements and the countryside will not be neglected, still considered it overly prescriptive in only allowing single dwellings in smaller settlements through rounding off and infill. One response suggested a new settlement between Kesh and Belleck to help alleviate housing need in rural areas and also that the boundaries of the towns and villages be extended.

### **Main Issues 2 and 3: Housing and Economic Land Allocations**

- 3.9 With regard to the Housing Allocation, three representations, whilst agreeing with the Council's preferred option 3, considered the Housing Growth Indicator (HGI) figure (of 5,190 dwellings for the plan period) as flawed and too low. They used a different assessment methodology and baseline to calculate the HGI and suggested that the HGI should be 5,878 dwellings, taking into account the build rate over the period 1998-2013. Their assessment was used to justify further sites to be included for housing allocations. One response suggested more land should be allocated for housing to curb competition and assist in reducing house prices.
- 3.10 The RSPB NI considered that FODC should be more ambitious and seek to accommodate a larger percentage of housing within the two hubs and with brownfield land prioritised. They considered this would better reflect policy within the SPPS. The UAHS considered that the allocation of 1,370 houses in the countryside (as per the preferred option) is high and linked to an understanding that historically an over allocation of single dwellings in the countryside has degraded landscape character.
- 3.11 One representation did not agree with the Council's preferred option for Economic Land Allocation as it did not promote a range of opportunities for new businesses (e.g. high quality urban environment) and instead the

emphasis of allocations was towards the A5 route. The RSPB NI did not agree with the Council's preferred option as it could result in substantial development in areas where the environment does not have capacity to accommodate further growth.

#### **Main Issue 4: Sustaining Rural Communities**

- 3.12 Dalradian Gold Ltd supported the Council's preferred option. They noted that any future proposal at Curraghinalt will result in significant employment opportunities. They also advocated a strategy for resisting housing developments in the countryside as this could potentially prejudice mineral extraction. They also queried the quality of the evidence base, namely the landscape capacity assessment. The UAHS agreed with the preferred option to concentrate on clustering rural development around existing buildings.
- 3.13 The RSPB NI opposed the Council's preferred option. They considered the exclusion of environmental assets indicated by the Rural Protection Areas would not go far enough and it would fail to protect important areas including non-designated environmental assets.

#### **Main Issues 5 & 6: Economic Development, Industry and Commence**

- 3.14 One respondent did not agree with the Council's preferred option as they considered it would focus further economic employment in existing business parks and industrial zones only, but should in fact include other options and areas. The Derrygonnelly & District Community Enterprise suggested the promotion of small businesses in rural settlements as opposed to existing designated industrial areas.
- 3.15 Dalradian Gold Ltd supported the Council's preferred option. They noted the employment and training opportunities available at present in the mining industry and associated with any future proposal at Curraghinalt. The UAHS recognised the important contribution of re-using historic properties in the retail core particularly upper floors for residential and commercial use.

#### **Main Issue 7: Minerals Development**

- 3.16 There were a substantial number of comments received in relation to this issue, both from interest groups, groups of members of the public and individuals.
- 3.17 Groups such as 'Love Leitrim', the Letterbreen and Mullaghduin Partnerships, Fermanagh Fracking Awareness Network and Belcoo Frack Free and a significant number of individual responses (600+), strongly opposed further mineral exploration or extraction within FODC and with particular reference to 'fracking' or 'unconventional hydrocarbon exploitation'. They tended to

promote a policy change which would go further than the Council's preferred option 3 by either increasing those areas where mining would be subject to further control or requesting an entire ban on fracking within all of the FODC area. Various background documents and research papers were presented in support of a ban.

- 3.18 Many responses raised concerns about the potential negative impact on human health, animal health, the wider environment and food production as a result of mining activity. Some comments also considered 'fracking' would have a knock-on negative economic impact. There were requests to reduce 'short term', as presented in both options 2 and 3, from 15 years to 5 years so as to minimise any impacts.
- 3.19 There were also a significant number of comments which referenced the Sperrin AONB and its historic, environmental and landscape quality. They were principally concerned with the impact gold mining would have on the environment of the AONB as well as negative impacts on matters such as tourism and the economy. This included the comments from Save our Sperrins (SOS).
- 3.20 Dalradian Gold Ltd opposed the Council's preferred option. They suggested the Council's evidence base is lacking and thus did not support this option. They considered that the lack of information or evidence on mineral safeguarding areas undermined the LDP process and is flawed. They provided commentary on the economic benefit of mining and considered this had not been fully recognised in any of the options. They promoted an approach where each mineral should be considered separately and when looking at the areas of constraint for mineral extraction. They do not consider the landscape character assessment is a sound evidence base. They opposed the introduction of a time limit of 15 years which they considered arbitrary and not based on evidence.
- 3.21 Although the Quarry Producers Association of Northern Ireland (QPANI) agreed with the thrust of the Council's preferred option 3, they strongly opposed any policy that would introduce a prejudicial constraint on mineral development in AONBs.
- 3.22 Quinn Industrial Holdings Limited welcomed the fact that the POP recognised the presence and the importance of the availability of high grade limestone. Generally, they welcomed the Council's preferred option 3 but raised concerns about any potential constraints for mineral extraction in certain areas or with time limits. They suggested that consideration should be given to the nature of the reserve and existing industry if identifying safeguarding mineral resource areas.
- 3.23 Dalradian Gold Ltd, QPANI, and Quinn Industrial Holdings Ltd all recommended engagement with the Geological Survey NI (GSNI) and the Minerals and Petroleum Board to establish mineral safeguarding areas.

- 3.24 The RSPB NI recognised that mineral sites have the potential to enhance biodiversity through high quality restoration. The UAHS suggested a bespoke policy for the small extraction of traditional building stone is required for the repair of traditional buildings and features.

### **Main Issues 8 & 9: Renewable Energy**

- 3.25 The Northern Ireland Renewables Industry Group (NIRIG) opposed the Council's preferred option, particularly in how it sought to limit development in sensitive areas, and such an approach would be contrary to national policy and the evidence base. They also noted that there is no reference within the POP to the national target for 40% of all electricity consumed to be generated from renewable sources. They considered there is a gap in policy when it comes to the 're-powering of renewable energy projects' and this should be looked upon favourably.
- 3.26 Canavan Associates (who have previously been involved with renewable energy projects, in particular wind energy) promoted Option 1, and therefore were not in favour of introducing stricter control to protect sensitive areas, as advanced in the Council's preferred option 2. They noted that, within the SPPS, there is already a precautionary approach to siting renewable energy in AONBs. Therefore they advocated the sensitive siting of wind farms, assessed on a case-by-case basis, to allow protection of the most sensitive landscapes while ensuring sufficient renewable energy provision. They also considered that the economic benefits and employment opportunities created by wind energy developments were not fully reflected in the POP.
- 3.27 A large number of individual and grouped responses, and responses from groups such as the West Tyrone against Wind Turbines, raised concerns about the potential impact of wind turbines and expressed strong opposition to further wind energy development. A significant number of these comments referenced the Sperrin AONB and its historic, environmental and landscape quality and were concerned with the impact of wind farms.
- 3.28 A large number of commentators who opposed 'fracking', instead suggested development of "community owned renewable energy to create sustainable jobs, profit and energy for the community".
- 3.29 The RSPB NI suggested increasing the areas considered sensitive to wind energy development and to include a number of other designated and non-designated areas. The UAHS also suggested that more sites should be added including listed buildings, conservation areas, and areas of townscape character but also acknowledged that the assessment of the impact of wind farms on heritage assets should be on a case-by-case basis.
- 3.30 One response did not agree with the Council's preferred option 3 for integrated renewable energy for new housing as this is already covered by building regulations. Dalradian Gold Ltd supported the Council's preferred

option but with a caveat that it may not be appropriate for all buildings to integrate renewable energy and passive solar design and therefore suggested that the policy should be more flexibly worded. The UHAS, while broadly supporting integrated renewable energy, noted that there were sometimes difficulties with incorporating solar panels in historic traditional buildings or historic areas.

### **Main Issues 10, 11 & 12: Tourism**

- 3.31 As noted above, many of the respondents recognised the importance of tourism, for example in the Sperrins, but did not comment with particular reference to this main issue and Council's preferred options. The UHAS suggested Omagh and Necarne Castle as particular locations to develop tourism.
- 3.32 The RSPB NI highlighted that human activity can sometimes have a negative effect on biodiversity, and this includes recreational tourism on, for example, wetland dwelling birds. They therefore promoted a strategy which steers tourism development away from sensitive locations.

### **Main Issue 13: Supporting Good Design and Place Making**

- 3.33 A number of responses requested supplementary planning guidance for development in the Sperrin AONB (Question 16b). This was most often by those who opposed mineral or wind energy development.
- 3.34 Dalradian Gold Ltd also supported the Council's preferred option. However, they did not believe that there was a need for supplementary planning guidance for the Sperrin AONB as an AONB is already subject to additional scrutiny when it comes to assessing potential impact on landscape and environmental quality.

### **Carried Forward Planning Policies**

- 3.35 A number of the respondents have requested that the Sperrins - or areas/ townlands within the Sperrins - should be designated as an Area of Significant Archaeological Interest or an Area of Archaeological Potential and to extend the existing Beaghmore Area of Significant Archaeological Interest into the FODC area. It was also suggested that a Management Plan (or similar) should be produced for the Sperrin AONB (Question 17).
- 3.36 There were particular comments in relation to paragraph 12.30 (Minerals) and thus linked to *Main Issue 7: Minerals*. A large number of those opposed to fracking stated that paragraph 12.30 was not explicit enough in relation to unconventional hydrocarbon extraction. They proposed an alternative wording along the lines of "the Council totally oppose shall gas exploration and

extraction by the process of hydraulic fracturing” and therefore would not follow the precautionary approach suggested in the SPPS.

- 3.37 Inaltus considered a 1,000 sq.m threshold for Retail Impact Assessment was arbitrary and not based on any evidence. They noted the importance of a retail capacity study to assess any changes to town centre boundaries or Primary Retail Frontages.

### **Other Strategic Issues**

- 3.38 A representation received on behalf of Trillick 2020 while not site specific, provided commentary on the decline of both Trillick and Kilskeery, and identified a number of community land use requirements and the need for additional housing, including housing for older people.

Further comments by the RSPB NI queried the procedural timing of the production of the Habitat Regulations Assessment.

A number of comments identified the lack of Broadband/internet provision and poor mobile signals in rural areas as a particular concern.

## **4.0 Summary of Findings from Questionnaires**

- 4.1 A total of 77 questionnaires were received of which 48 were submitted online and 29 were received by post from individuals and representatives of groups.
- 4.2 A number of the questionnaires addressed the same issues and were identical in terms of content. Other detailed comments were made to specific topics and not all topics were addressed in each of the questionnaires.

### **The Vision and Objectives**

- 4.3 The majority of the representations agree with the vision and strategic objectives with only minor changes suggested in relation to specific wording. Proposed amendments included reference to: rural living alternatives with specific mention of eco villages; protection of biodiversity; important landscapes and the environment, including the historic and archaeological; the protection of human health; and placing environmental considerations before economic considerations.

### **Main Issue 1: Spatial Growth Strategy**

- 4.4 The majority agreed with the Settlement Hierarchy. A number of areas were suggested as small settlements: Cavanaleck / Cran; Cashel; Boho; Killyclogher; Cooneen/Coonian; Knocks; and Arvalee at Golan Crossroads. It

was proposed that the Council adopt the One Planet Development Policy<sup>1</sup> in bringing forward an eco-village approach with a number of locations proposed.

- 4.5 The majority of those who responded agreed with the Council's preferred option for a spatial growth strategy and for development in support of rural communities. Alternative approaches suggested proposed that: the hubs focus should be on major transport corridors; limiting development in the countryside to clusters.

### **Main Issues 2 and 3: Housing and Economic Land Allocation**

- 4.6 There was general consensus for the preferred option for the allocation of housing and economic land. It was suggested that the Council should seek to grow the population in the two main towns but also along all towns lying along arterial routes. Others argued that housing allocations are required for the smaller settlements to support the local services.
- 4.7 Economic Development land should be allocated within small settlements and that there should be a generous allocation of economic land not based on formulas. Option 1 would encourage workers in the local towns to walk, cycle and car share. It was also suggested that the redevelopment of brownfield/vacant commercial sites should be prioritised over the zoning of new land.
- 4.8 Strathroy Dairies agreed with Option 2 and suggested a policy approach which enables the expansion of large scale industrial uses within settlement limits into the countryside. They suggested that in zoning land consideration should be given to neighbouring land uses to ensure they do not hinder future expansion of the existing industrial development.

### **Development in the Countryside**

#### **Main Issue 4: Sustaining Rural Communities**

- 4.9 The majority of those who responded agreed with the Council's preferred option for sustaining rural communities. Some suggested that development in the countryside should be restricted to clusters, unless agriculture occupancy conditions dictate otherwise and that policy should be reviewed to allow more than one dwelling on a farm where there is a demonstrable need. Rural living alternatives such as Cloughjordan sustainable eco villages should be promoted.
- 4.10 Any curtailment of residential development in the countryside should be balanced with providing for housing and economic development land within the villages and small settlements. Local accommodation for the elderly

<sup>1</sup> <http://www.oneplanetcouncil.org.uk/wp-content/uploads/2014/02/One-Planet-Development-TAN6.pdf>

should be provided in some local towns and villages to keep them within the community.

- 4.11 A map outlining Special Countryside Areas, Rural Protection Areas and Remaining Countryside areas was requested by a number of people so that they could consider what the preferred option 2 meant.

### **Main Issue 5 and 6: Economic Development**

- 4.12 The majority of those who responded agree with the Council's preferred option for addressing deprivation/regeneration in urban areas. Carrickmore, Greencastle, Gortin and Drumduff were identified as areas which would benefit from this approach. There was general mention of the need for regeneration and revitalisation with some specific reference to Lisnaskea, Fintona and Sixmilecross.
- 4.13 The majority of those who responded agreed with the Council's preferred option for addressing deprivation/regeneration in rural areas. It was suggested that consideration be given to encouraging sustainable, sensitively sited business start-ups in the countryside, villages and small towns. Any economic development in these rural areas should have long term benefits for local communities.
- 4.14 It was also felt that many heavy industrial enterprises within urban areas are not compatible with adjacent residential uses and consideration should be given to encouraging such development in appropriate rural areas. Specific mention was made of sensitive and sustainable forms of economic development in the Sperrin AONB.

### **Main Issue 7: Minerals Development**

- 4.15 The majority of those who responded disagreed with the Council's preferred option for addressing minerals development but did not clarify why. In relation to the options, it was put forward that the period for minerals works should be shortened to 5 years or less, with others expressing that temporary/exploratory and prospecting works should not be allowed at all. Restoration works should be the responsibility of the minerals industry and not the taxpayer.
- 4.16 A large number of those who responded felt there should be a total prohibition to unconventional hydrocarbon extraction/fracking in the FODC area in line with the motion that was passed on the 30<sup>th</sup> July 2014 by the former Fermanagh Council. The following policy wording has been provided:

*“Fermanagh and Omagh District Council will oppose the granting of petroleum exploration licences over target strata described as shales, mud-stones, coal seams and ‘tight’ sandstone formations. There will be a presumption against planning applications associated with the exploration and/or development of*

*petroleum resources situated in shales, mud-stones, 'tight' sandstone formations and coal seams".*

- 4.17 A distinction should be made between the quarrying of aggregates such as sand, gravel and peat from the mining of precious metals such as gold and silver due to the severe consequences of this type of industry. Gold mining should be viewed in the same way as fracking, with a presumption against such activity. There is recognition by some that minerals contribute to the economy, particularly in rural areas and to the construction sector. Through restoration and monitoring, the quarrying industry provides many environmental benefits including long term improvements to biodiversity.
- 4.18 The following areas should be considered as ACMDs: ASSIs; Areas of Archaeological Potential; Sperrin AONB; UNESCO Geopark; SACs, European Priority Habitats, Ramsar sites, nature reserves such as the Murrins Nature reserve in the Sperrins, any areas near to settlements or housing, schools, rivers, water catchments, reservoirs or drinking resources and Greencastle/Gortin/Rousky area.
- 4.19 Others have argued that it is premature to apply areas of constraint on minerals without first establishing the volume of reserves which are currently available within the District. Mineral safeguarding areas should be added as a means of restricting rural housing development at inappropriate locations.

### **Main Issue 8 and 9: Renewable Energy**

- 4.20 The majority of those who responded agreed with the Council's approach to Renewable Energy. Those who disagreed with the Council's preferred option felt that renewable energy should be encouraged, and that local communities must have a stake in the profit. Reference was made to community owned renewable energy developed to create sustainable jobs and energy for local communities.
- 4.21 The following areas were suggested as Areas of Constraint for Wind Development: Belmore Mountain; Geopark; Sperrin AONB; Areas of Natural Conservation Interest; Areas of Archaeological Potential; Murrins Nature Reserve; and areas within Co. Fermanagh and Omagh which have a high volume of existing windfarms and single turbines.
- 4.22 Bessy Bell wind farm was evidenced as an example of wind energy development that could be accommodated into the landscape to such an extent that it did not prevent the designation of the landscape as an Area of Scenic Quality. Conversely, it was also argued that large scale wind turbines in terms of height or numbers, are only appropriate off shore.
- 4.23 The majority of those who responded agreed with the Council's preferred option for addressing Integrated Renewable Energy and Passive Solar Design. It was felt that the integration of renewable energy and passive solar

design should be an absolute requirement of all new developments unless there are demonstrable physical or technical feasibility constraints that make it impractical. It was proposed that all renovations to old houses should have to insert renewables technology.

- 4.24 It is also felt that the threshold for requiring integrated renewable technology and passive solar design should be lower. Low impact sustainable houses should be encouraged in all new builds and renovations where practical, and that Community owned and community controlled energy should be promoted.

### **Main issue 10, 11 and 12: Tourism**

- 4.25 The majority of those who commented on the tourism questions agreed with the Council's preferred approach to tourism and suggested locations that could be developed for tourism and 'Visitor Hubs'. Some commented that small scale tourist projects should be used to sustain rural communities as opposed to goldmining and windfarms. Eco villages should be developed and used in relation to tourism activities and visitor hubs. Designated coach parking in Omagh and Enniskillen was also requested for tourists to the area.
- 4.26 New tourism developments should be strictly controlled in and around the lake shores, unless small in scale and can be proven to be sustainable development. When referring to lakes and waterways those in the Omagh area should also be included. There should be restrictions on developing Lough Erne islands.
- 4.27 The following areas were suggested for Tourism/Visitor hubs: Carrybridge and Upper Lough Erne; Killesher and Arney – ecovillage; Lough Navar/Ballintempo forest - mountain biking; Lough Macnean and Arney Rivers – canoe trails; the Geopark; Sperrins AONB (including Gortin Glens, Gortin, Rousky, Greencastle and An Creagan); Bellanaleck; Loughmacrory; Kesh; Killadeas; Belcoo; Belleek; Brookeborough; Omagh; Enniskillen; Lisnaskea; Sixmilecross; Drumquin; and Tempo/Clabby.

### **Main Issue 13: Supporting Good Design and Place Making**

- 4.28 The majority of those who commented on the supporting good design and place making questions agreed with the Council's preferred option. There was also majority agreement that there should be supplementary planning design guidance specifically for the Sperrin AONB in conjunction with the adjoining 'AONB' Councils, with one respondent indicating that the AONB should be governed by one body and not four Councils. In addition it was suggested that there should be supplementary design guidance for the shores of Lough Erne, the Geopark and historic areas.

- 4.29 A 'One Planet Development Policy' approach was suggested to supporting good design and place making. Signage should be branded to reflect the tourism product on offer, this is especially necessary in the Sperrin AONB. The AONB should be designated a Gaeltacht area with signs in both Irish and English.

### **Carried Forward Policies**

- 4.30 Very few comments were made in relation to the carried forwards section. These were as follows:-

### **PPS 6 – Planning, Archaeology and the Built Heritage**

- 4.31 A number of Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential were suggested:- Church of Ireland yard, Glenroan Badoney; ancient Fort by Arney River; Copney Stone Circles; Mile Lane, Greencastle; Curraghinalt; Cleenish Island, Bellanaleck; Garrison; Monea/Tully; Newtownbutler; Islands off Lough Erne; Creggan; Drumquin; and local massrocks.

Suggested Local Landscape Policy Areas included: Big Dog and Little Dog Hillock Areas; woodland on the outskirts of Gortin, Crockanboy Road; and Termon Estate, Carrickmore.

### **PPS17 – The Control of Outdoor Advertisements**

- 4.31 A design guide should be produced to include historic areas for example the Conservation areas in Enniskillen, Lisnaskea and Omagh, and on the villages with character such as Brookeborough, Gortin, Ballinamallard, Belcoo, Belleek, Mountjoy, Monea and Sixmilecross. There are examples of appropriate signage controls in other jurisdictions. It was stated that there should be a presumption in favour of well-designed signage in the commercial centres of the two main hubs whilst it was set out that there should be a complete ban on signage outside of urban areas as it does not integrate with surroundings.

### **PPS 10 – Telecommunications**

- 4.32 It was suggested that mobile router hubs could be set up.

### **Town Centres and Retailing**

- 4.33 Savills (Ltd), on behalf of Ellandi LLP who manage Erneside Shopping Centre and the Showgrounds Retail Park, commented that 1,000 sqm gross external area, as a maximum threshold for requiring the submission of a Retail Impact Assessment, is inappropriate in the case of Enniskillen and Omagh, where

average comparison and convenience unit sizes are far below 1,000 sq. m. The approach would allow large scale units of 999 sq. m to be promoted in smaller towns and villages. Also, 1,000 sqm in an out of centre location in any of the local towns or even main towns is likely to be very damaging to the vitality and viability of the associated town centre given the limited population growth and increase in expenditure capacity forecast for the emerging plan period.

### **Town Centres of Enniskillen and Omagh**

- 4.34 The following comments were made in relation to the town centre boundaries and primary retail cores:
- Enniskillen Town Centre is from Belmore Street to the Hollow (and up to the Churches) also Derrychara/Erneside. Railway Street. Derrychara could be developed when Devenish College is relocated to the Tempo Road.
  - The Primary Retail core in Omagh is High Street.
- 4.35 Due to the limited size of Enniskillen and Omagh, respondents considered that it was not appropriate to designate further local centres within these towns. The designation of local centres would add an unnecessary layer of complication and that it would detract from the town centres. The focus should be on directing development and occupiers to opportunities within the defined town centres to deliver town centre regeneration and address vacancy rates. This would be in the interests of improving the vitality and viability of the centres in the most sustainable locations for all residents. It was considered that 'brownfield' sites in town centres should be developed before considering out of town development. There is also a need for nature/green areas within town centres.

### **Vacant Sites in Enniskillen and Omagh**

- 4.36 The redevelopment/reuse of the vacant sites in Enniskillen in Omagh should be used to address deprivation issues in urban areas. 'Creative' leasing to Artistic endeavours, similar to the Temple Bar area, should be promoted to enhance and re-invigorate the town. Stalls with locally grown produce should be set up on a daily/weekly basis to encourage local business and increase wealth generation throughput in the towns.

## **5.0 Summary of Key Findings from Public Workshops**

### **Public Workshops**

- 5.1 The launch of the Preferred Options Paper was followed by a series of 13 public consultation events across the Fermanagh and Omagh District Council area.

- 5.2 At these events a presentation on the context of the Preferred Options Paper within the Local Development Plan process was given, setting out the main issues and sets of options within it. Following this facilitators led introductions across smaller groups, asking each individual to identify their topic areas of interest to order to establish the priority areas for discussion. For some of the more poorly attended events, i.e. Kesh, Derrygonnelly, Fintona and Rosslea, the events took the form of a round table discussion, again led by the priorities identified by those in attendance.
- 5.3 Whilst attendees were encouraged to consider the breadth of the issues raised within the Preferred Options Paper, the issues of Renewable Energy and Mineral Development dominated a number of the consultation events, reflecting particular localised interests. Some of the matters raised were unrelated to the Preferred Options Paper and reflected discontent in relation to historic planning decisions.
- 5.4 The issues raised are considered against the vision and strategic objectives for the area; overarching principles; the spatial strategy and issues to be addressed in the LDP including sustaining our rural communities, tourism, minerals development, renewable energy and supporting good design and place making. Comments on Carried Forward Policies and other strategic issues raised are also included.

### **The Vision and Objectives**

- 5.5 There was limited discussion of the Vision and Strategic Objectives at the public consultation events. However, across the majority of the events there was a strong sense of the need to stop the decline of the rural area and to actively sustain rural communities.

### **Main Issue 1: Spatial Growth Strategy**

- 5.6 The options for the Spatial Growth Strategy were not raised as priority areas by many of the attendees. However, there were many comments made in relation to the need to sustain those parts of the FODC area which lie beyond the two main towns of Omagh and Enniskillen. Whilst there was a significant 'voice' in relation to the decline of the rural area this was not related solely to the countryside but also a concern expressed that in relation to the decline of the local towns (Dromore and Carrickmore), villages and smaller settlements and the need to sustain these, particularly in regards to the provision of land for economic development and affordable housing.

### **Main Issue 4: Sustaining Rural Communities**

- 5.7 Whilst there was overall agreement on the need to sustain rural communities and address the issue of decline in rural population and loss of young people from these areas there was not a general consensus on a way forward. The view was expressed that in order to manage the rural landscape and make it more vibrant that people needed to live in the countryside. It was also set out

that the integrity of the countryside should be protected and managed for future generations. Views varied from those who felt that there was a need for a more permissive policy context for single houses in the countryside to those recognising that the policy approach under the Planning Strategy for Rural Northern Ireland was a 'free for all' and was not sustainable. The position was put forward on a number of occasions that families should be able to build houses for their farms as well as providing for the non-farming rural dwellers with others indicating that these were already provided for.

5.8 Particular cases were being put forward to make provisions to:

- allow for the care of the elderly;
- address the need for a more flexible interpretation of siting of houses on farms, balancing the need to both integrate and cluster;
- retain the Dispersed Rural Communities as designated under the Fermanagh Area Plan 2007;
- define Dispersed Rural Communities;
- provide affordable housing to retain rural population;
- promote the re-use of vacant housing stock;
- consider the replacement policy in respect of the wall-steads of those dwellings which have deteriorated past the point of being acceptable as a replacement under current policy;
- allow for the regeneration of the rural area;
- support rural communities;
- allow for in-built flexibility into planning policy to enable 'good-sites' to be taken forward in favour of those which meet both the 'integrate' and 'cluster' tests.

### **Main Issues 5 & 6: Economic Development, Industry and Commerce**

5.9 There was a 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. Overall Economic Development was referenced mostly in terms of the need for the sustainable job creation within the FODC area, with some emphasis on enabling economic development within the rural area. There was discussion in relation to the use and availability of economic development land and further issues of achieving vehicular access as well as access to infrastructure on third party lands. The opinion was expressed that economic development zonings should act to consolidate and extend existing industrial/business parks where there is already a level of infrastructure in place.

5.10 Some people commented that the economic benefits of the renewable sector in the FODC area were not being passed on to the local communities. Others felt there was a need for the creation of rural business hubs to facilitate business with accommodation and good digital connectivity and that there was a need for revitalisation of some of the settlements to encourage/attract investment.

## **Main Issue 7: Minerals Development**

- 5.11 A mix of interested individuals and representatives from the Minerals Industry across the events provided comment in respect of the options presented and on mineral development generally. General comments in relation to mineral extraction from the industry reinforced the value of the mineral and aggregate industry locally and the dependence upon it for the construction sector whilst others called for a time limit for sand and gravel extraction. There was general comment in relation to the impact of mineral extraction on: the amenity of neighbours; the visual impact on tourism areas; and the impact of gold mining in particular.
- 5.12 In relation to Option 2, the Mineral Industry queried what evidence/assessment had been used to identify the Sperrin AONB as an Area of Constraint on Mineral Development. They indicated that the Council should not stymie the development of resources on the basis of where they are located, and emphasised the importance of employment generated. It was also argued to the contrary that Option 2 should be further tightened, putting forward that there was a need for greater protection within the Sperrin AONB from mining – stating that they do not want any industrial or commercial development within the AONB. Others cited that the lack of facilities in the area is due to the concentration of windfarms and the gold mine. Attendees put forward that Councils which have a share in the Sperrin AONB should have a similar planning policy approach to it
- 5.13 In discussing minerals development, both unconventional hydrocarbon extraction (fracking) and gold mining, dominated a number of events reflecting on-going local interest/concerns.

### **Unconventional Hydrocarbon Extraction**

- 5.14 The discussion in relation to ‘fracking’ focused in the main on the absence of options within the Preferred Options Paper regarding unconventional hydrocarbon extraction. Attendees were advised of the Council’s intention to reflect the regional policy on unconventional hydrocarbon extraction in paragraph 8.7 within the Preferred Options Paper which sets out that there should be a presumption against their exploitation until there is sufficient and robust evidence on all environmental impacts. Concerns were expressed that the Fermanagh and Omagh District Council should also be addressing their exploration – i.e. boreholes, as part of the policy approach. It was explained that at the time of the events exploration was part of a legislative test for permitted development. If the exploration extended beyond what was allowed for within legislation then it would be deemed to require planning permission which would invoke the presumption against unconventional hydrocarbon extraction.

## **Gold Mining**

- 5.15 A policy should be taken forward in relation to gold mining which requires developers to state what will happen to the proposal and to the site in 20 years' time. Representation from the Greencastle Residents Group expressed concern in relation to the extent of licenses for gold exploration and asserted that people had not initially appreciated the potential impact of the gold mine.

## **Main Issues 8 and 9: Renewable energy**

- 5.16 There was a strong body of anti-wind farm representation at a number of the events citing historic planning decisions in relation to wind farms and substations. Whilst these were not relevant to the options within the Preferred Options Paper following discussions a number of suggestions were forthcoming:
- applications for wind energy should include associated infrastructure such as substations. The siting, visual impact and any health concerns should also be part of the policy;
  - there is a need to consider the health and safety implications of wind energy;
  - Electro-magnetic fields should be taken into account in the determination of new applications;
  - Greater consideration should be given to the siting of wind turbines in proximity or adjacent to the AONB;
  - There is a need for community/social benefits arising from wind farms;
  - Wind farms should be located in one area;
  - Policy should include recommended distances from residential properties;
  - Too much emphasis on wind farms –still remains a need to support single wind turbines;
  - There is a need to protect service areas for wind farms;
  - Need to protect against over saturation with wind farms.

## **Main Issues 10, 11, 12: Tourism**

- 5.17 Overall tourism was recognised as a potentially significant economic driver within the Fermanagh and Omagh District Council area, with particular emphasis placed on the landscape, lakes and waterways as attractions. This strategic approach should follow through in the management of access to the lakes and waterways in line with Option 1. There was a consensus that a strategic joined up approach is needed and that this should be facilitated through the identification of tourism hubs to support their development and attractiveness to the customer. Potential tourism hubs suggested were Belcoo, Sperrins AONB and Aughakillymaude. There is a need for

consistency of approach to policy making by all the Councils with a 'share' in the Sperrin AONB.

### **Main Issue 13: Supporting Good Design and Placemaking**

- 5.18 Attendees agreed on the need to support sustainable good design and placemaking. It was put forward that the key sites forthcoming in the two main towns need to be addressed. The Council should have its' own 'design champion' to promote and engage with groups. The FODC area could be leaders in zero energy buildings.

### **Carried Forward Policies**

- 5.19 Generally the Carried Forward Policies did not feature in the priority areas identified for discussion at the events, except where they related to one of the Main Issues identified within the Preferred Options Paper. CTY 10 of PPS21, was identified as an area of concern, with the policy considered to be too strict. A lack of affordable and social housing was raised as an issue at a number of events. Issues were raised in relation to improving the level of digital infrastructure across the FODC area however the problem was viewed to relate to providers and not the current planning policy.

### **Other Strategic Issues**

- 5.20 Reference was made to the need to protect natural heritage, especially west of Lough Erne with specific references made to an area of fenland at Lough Navar.

### **Summary of key comments from Section 75 Workshops**

- 5.21 In conjunction with Community Plan, workshops were carried out across the following Section 75 Groups: Travellers Group; Omagh Ethnic Community Support Group; SWAP (South West Aging Platform); Youth Council Omagh; Youth Council Enniskillen; LGBT Fermanagh; Access and Inclusion Group; Surestart; and Omagh Community House. There was limited discussion of the Vision, Strategic Objectives and Spatial Growth Strategy. However, there was a strong message, from the youth groups in particular, in relation to the rural area 'having nothing' for them in relation to services, employment and future prospects for themselves.

### **Main Issue 4: Development in the Countryside**

- 5.22 There was discussion of the difficulties in achieving planning permission for single houses in the countryside and of the need to provide more opportunities for this. References were made specifically to the policy tests for a House on a farm and for replacement dwellings.

### **Main Issue 5 & 6: Economic Development, Industry and Commerce**

- 5.23 Across a number of the Section 75 groups concern was expressed in relation to the need for creation of jobs within the district. Whilst there was support for the provision of jobs within the two main towns there was also support for increased opportunities for businesses in the small towns, villages and countryside.

### **Main Issue 7: Mineral Development**

- 5.24 A number of the Section 75 Groups raised the issues of 'Fracking' and gold mining in the Sperrin AONB. It was felt that the Fermanagh and Omagh Council should be taking 'its own' stand in relation to unconventional hydrocarbon extraction beyond what is stated within the Preferred Options Paper in respect of the SPPS. There was also concern expressed at the potential impact of gold mining on the Sperrin AONB. There was also discussion of the role of the Plan Strategy in decision making regarding any application for the extraction of gold in the Sperrin AONB.

### **Main Issue 8 & 9: Renewable Energy**

- 5.25 There was little discussion of renewable energy.

### **Main Issue 10, 11 & 12: Tourism**

- 5.26 Whilst there was recognition of the potential for Tourism to contribute significantly to the local economy and the role of the assets within Fermanagh and Omagh to that industry there was little discussion beyond this.

### **Main Issue 13: Supporting Good Design and Place-Making**

- 5.27 Attendees agreed on the need to support good design and place-making, seeing it play a big role in the future development of vacant and up-coming sites across the two main towns. Suggestions were put forward in regard to the use of these sites for vocational training as they are considered to be central and accessible. The Accessibility and Inclusion Group referenced the need for particular regard to the design and décor of buildings. The Youth Group in Omagh were supportive in particular of stricter control of built heritage.

### **Carried Forward Policies**

- 5.28 The policies for a House on a Farm and Replacement dwellings were identified as areas of concern, with these policies considered to be too strict. A lack of affordable and social housing was raised as an issue at a number of

events. It was stated that 85% of rented accommodation was provided by the private sector and that this disguised the need for social housing within the District. It was also stated that there was a need for affordable housing. Issues were raised in relation to improving the level of digital infrastructure and road network across the District. There was also concern expressed in regard to the lack of age appropriate and up-to-date facilities and play areas across Fermanagh and Omagh. It was stated that families were leaving the district for 'days out' as facilities were either lacking, out of date or were difficult to access via public transport.

## 6.0 Summary of Comments on the Interim Sustainability Appraisal Report

- 6.1 A number of the statutory consultees, interest groups or members of the public commented specifically on the Interim Sustainability Appraisal (SA) as part of their consultation response. There was also a question on the questionnaire asking for views on the contents or findings of the Interim SA. Most chose not to respond to this question. Appendix 2 provides a summary of the comments received on the Interim SA.
- 6.2 Generally, comments on the Interim SA related to specific issues of interest to the respondent. Many of the responses provided a counter view on how scores were awarded against the various 'Options' within the Assessment Matrices at Appendix A of the Interim SA (e.g. a *positive* score instead of *negative* or vice versa).

### Comments from Statutory Consultees

- 6.3 DfI noted that the *Carried Forward* policies should be tested through the SA to ensure the LDP is sound, and that there appeared to be insufficient linkages showing how the Preferred Options had been informed by the SA. The Department for Agriculture, Environment and Rural Affairs (DEARA) SEA Team, raised concerns with the level of detail within the Interim SA on mitigation and where an impact was considered to be negative.
- 6.4 The Historic Environment Division (HED) of the Department for Communities (DfC) disputed a number of the scores awarded in the Assessment Matrices and with a particular emphasis on the potential positive impact of the re-use of non-designated heritage assessments and that some low carbon technology or integrated renewal energy can lead to a negative impact on heritage assets. Similarly, the DEARA SEA Team considered that some of the scores awarded were not correct or lacked robust justification to inform them. Gaelectric Developments Ltd (GDL) were concerned with some comments in the SA which they considered were subjective and thus unfairly negative against wind farm developments.

- 6.5 Both DfI and DAERA noted a number of other background documents that should be referred to in the Glossary and considered as part of Appendix 2 of the Interim SA.

### **Comments from Interest Groups**

- 6.6 Dalradian Gold Limited and Quarry Products Association Northern Ireland (QPANI) considered that the SA fails to fully recognise the socio-economic benefits of mineral development. Dalradian also raised some concerns with the procedural and technical compliance of the SA with relevant legislation, in particular, whether the Council had complied with the 2015 Practice Note 4 (Sustainability Appraisal) and had consulted with NIEA in respect of the draft Scoping Report. Notably, in their view, they considered that some of the reasonable alternatives put forward were not realistic and there was a failure to sufficiently involve statutory consultees and other interest groups at the scoping stage and thus undermining the process. Their viewpoint is that for this reason the POP and Interim SA should be revised and subject to re-consultation.

## **7.0 Conclusion**

- 7.1 The consultation with statutory bodies and the public has demonstrated that there is a wide range of different views being expressed regarding the Council's Preferred Options. Whilst there is recognition for the need for sustainable growth, there are different views on how much growth should occur in the countryside, as a proportion of the overall Housing Growth Indicator. People also had differing views on how restrictive the planning policy should be for minerals development and wind energy development in sensitive areas such as the Sperrin AONB and also raised concerns about how such developments can impact on tourism in the area. The Preferred Option for Sustaining Rural Communities invited comment mainly in regard to how potential Rural Protection Areas would be identified and the specific policies which would apply within them.
- 7.2 The challenge for the Council is to consider fully the comments that have been made when drawing up the draft Plan Strategy. It should be noted however that those representations that are site specific in nature, such as requests for inclusion of land within settlement limits, will be held over and considered in the preparation of the Local Policies Plan.

APPENDIX 2 Summary of Statutory Consultee Responses to Preferred Options Paper

Statutory Consultee	Summary
<p><b>Department for Infrastructure</b></p>	<p><b><u>Vision</u></b>  Council may wish to give consideration to developing a vision that is locally distinct, and that reflects and seeks to make the most of the unique characteristics of FODC.</p> <p><b><u>Strategic Objectives</u></b>  To support the achievement of the vision there is a need to ensure that the vision is carried through into the plan objectives.</p> <p>Strategic Objectives should address the key issues identified for the district and based on the evidence base. Strategic objectives should be integrated with regional/local policies and strategies.</p> <p>How will proposed objectives will be delivered, measured and monitored? The monitoring of progress of plan objectives is a key element of review process/measuring effectiveness of plan provisions.</p> <p>Plan objectives should represent a logical/coherent response to issues identified from evidence base and those trends highlighted in the spatial portrait.</p> <p>Data in relation to household formation is not supportive of the strategic objective of the RDS that aims to encourage an urban/rural renaissance and to manage housing growth to achieve sustainable patterns of residential development. Has this been considered in relation to the objective for housing and to clarify if the emphasis is on developing more high quality homes within existing urban areas? Need to address the increase in requirement for new social house and homelessness in the objectives.</p> <p><b>Crumlin Road Gaol and St Lucia Team.</b> Recognise the expansion of Omagh and Enniskillen. Need to seek ways to identify the distinctiveness of different areas within these towns, and seek better connection within them for pedestrians, public transport and cars.</p> <p>Further align draft objectives with the spatial framework guidance within the RDS - for instance by acknowledging that Enniskillen and Omagh are best placed to benefit from regional economic growth. The commitment to facilitate the creation</p>

of new jobs at suitable locations does not acknowledge the role of hubs and clusters of hubs in generating economic growth and jobs.

Questions the ability to secure objective in relation to improving physical connectivity and accessibility etc. as it is dependent upon the actions/investment strategies of other bodies or agencies. Council should be confident of the realistic delivery of such commitment, particularly where investment is required.

**Transportation Planning and Modelling Unit** – DFI will not be seeking to improve journey times within settlements. PFG indication 23 focuses on the ‘average journey time on key economic corridors’ which largely relates to interurban connectivity.

Consideration should be given to further supplementing the objectives to include specific reference to renewable energy.

**Public Transport Services** - Suggest that the objectives are contradictory eg regarding creation of jobs in suitable locations where they are accessible to all members of the community, including those without a private car.” which implies that jobs should be close to where people live Vs “to build Enniskillen and Omagh as economic and transportation hubs etc.”

**Water and Drainage Policy Unit.** The principles of Sustainable Water –A Long Term Water Strategy should be considered in the vision and objectives for the LDP to assist in working towards a sustainable environment.

**Crumlin Road Goal and St Lucia Team**

Merit in recognising the wonderful leisure and tourism opportunities that already exist in FODC, which span a diverse range of sectors/industries, with the aim of seeking to develop clusters, new partnership opportunities (that extend beyond the Council’s boundary but that combine tourism opportunities to present a wider offering) and additional promotional opportunities.

**Overarching Principles**

Reminded of 5 core planning principles of the SPPS in relation to the overarching principles, and the extent to which the policy proposals of the Plan align with these principles.

Remove reference to developer contributions from Overarching Principles – ensure that wording matches that within the SPPS when replaced elsewhere.

**Water and Drainage Policy Division.** The principle of sustainable water should be reinforced in the LDP to ensure that adequate infrastructure, including water and sewerage infrastructure is provided.

**General Comments in relation to policy options**

Demonstrate how preferred options will deliver the vision and strategic objectives of the plan. The link with regional policy should be adequately demonstrated – departures should be adequately demonstrated & supported by robust evidence base. SPPS should be read and applied as a whole. Concerns that some options lack sufficient clarity and not aligned with the approach set out in the SPPS. Councils should ensure that options provide a coherent policy response to the main issues identified.

Need to draw out linkages between policy areas and land uses. Consider how the preferred growth strategy can more fully reflect the SPPS subject policies. For example, housing in settlements, development in the countryside and transportation. This has been done for inter-relationship between housing, economic development and retail and service provision, and to the relationship between economic development and transportation.

**Spatial Options**

Options should be set within the regional and prevailing policy context, as well as the context provided by other relevant regional and local plans and strategies.

Concern that the distinction between Options 1 and 3 is not clear enough. Appears that difference between 1 & 3 is the proportion of housing allocated to the countryside (13.6 % compared to 26.4%). Department's view is this is insufficiently clear from the discussion around the Spatial Growth Options presented.

Option 2 - is this a realistic option? It is the Department's view that a dispersed growth option would not sit within the policy framework established by the RDS and SPPS

**Transportation and modelling unit.** Growth outside towns/hubs, where there are little or no public transport services will lead to accessibility being compromised.

Option 3 fails to mention the additional infrastructure requirements associated with this option. This option does not appear to support sustainable transport.

Accessibility analyses maps prepared by DfI could be used by the council to examine in greater detail the accessibility of potential sites to be zoned. LDP needs to reflect the strategic roads programme, providing necessary protection of lines.

Current zoned land remaining undeveloped as it remains landlocked. The allocation of housing/economic development land must have regard to deliverability and the likely availability of the land to come forward for development.

**Crumlin Road Goal and St Lucia Site.** Recent economic and educational changes have resulted in a high number of brown field sites currently available or becoming available within and near town centres.

Is there potential for town centre boundaries to be amended to accommodate anticipated future regeneration and to use this to enable the regeneration of the traditional town centre/heart of the community?

### **Housing Allocation**

Notes Council's commitment to allocate housing based on focusing major population growth in the hubs of Enniskillen and Omagh and providing balanced growth in the local/small towns.

Department has some concerns that the preferred Housing Allocation option fails to support the RDS objective of managing housing growth to achieve sustainable patterns of residential development - in furthering sustainable development it is important to manage housing growth having regard to the inter-relationship between housing, jobs, services and infrastructure. Important that the levels of growth do not exceed the capacity of the environment or existing infrastructure in this location.

Department has some concerns that the POP has not adequately demonstrated how the preferred Housing Allocation of 27.1 % of the HGI to the countryside is consistent with regional policy or that it represents a coherent option for delivery of the preferred Growth Strategy or addressing certain key trends within the Council Area.

Council is reminded that policy proposals that aim to create a critical mass of population to support a level of services will raise challenges for service providers in meeting the needs of a spatially dispersed population.

### **Economic Development Land Allocation**

Council should satisfy itself that the justification for selecting the preferred methodology for allocating Economic Development Land is consistent with other parts of the POP – eg Economic Development in the Countryside.

Will the Council give further consideration to the impact of such a proposal on the uptake of economic development land within towns and villages? Council need to ensure that the impact on environment, infrastructure and services is adequately considered.

### **Development in the Countryside**

Policy approaches should represent a logical and coherent response to the preferred growth strategy. The criteria is not clear for the designation of Rural Protection Areas. It would have been more meaningful to have identified for public consultation the number and extent. Query how this will operate alongside the carried forward policies in PPS21?

**Transportation and modelling unit.** Option 3 – drive time is only relevant to people with cars – consideration should also have been given to public transport accessibility.

### **Addressing Regeneration and Deprivation – Urban Areas**

This should be read in conjunction with the comments re allocation of economic development land. Council is reminded that options should be realistic, appropriate and deliver the intended outcome. Further clarification is requested on the proposal to bring forward criterion based policy for the provision of new build economic development the countryside. Important to demonstrate cross boundary working to demonstrate soundness.

Councils should note that mineral applications are required to be assessed for their compliance with the deemed conditions associated with the Planning (Management of Waste from Extractive Industries) Regulations (NI) 2015.

### **Addressing Regeneration and Deprivation - Rural Areas**

This should be read in conjunction with the comments re allocation of economic development land. Council is reminded that options should be realistic, appropriate and deliver the intended outcome.

Further clarification is requested on the proposal to bring forward criterion based policy for the provision of new build economic development the countryside.

### **Minerals Development**

Important to demonstrate cross boundary working to demonstrate soundness. Councils should note that mineral applications are required to be assessed for their compliance with the deemed conditions associated with the Planning (Management of Waste from Extractive Industries) Regulations (NI) 2015.

### **Overarching Renewable Energy**

Need to reference Strategic Energy Framework and reflect renewables in the strategic objectives.

The SPPS states that a cautious approach to renewable energy development proposals will apply within designated landscapes which are of significant value, such as AONBs – this does not amount to a presumption against renewable energy within those landscape.

Onus is on the Council to provide evidence to support the preferred option founded on robust and credible evidence base. Council should ensure that they have the necessary evidence to justify the proposed approach – for example, demonstrating that there is no further capacity to accommodate any wind energy development within these sensitive areas.

### **Overarching Tourism**

DFI do not like name read alongside carried forward tourism policies – need to rethink.

**Crumlin Road Goal and St Lucia Team.** Sound section with a very tradition term. Would there be merit in using phrases like 'seeking opportunities to enable existing tourism provision to develop innovatively to meet the needs of niche and future tourism users.'

**Operational Tourism**

Need to provide more clarity for proposals beyond visitor hubs as would not conform to tourism strategy.

**Lakes and Waterways**

Council should ensure that options and justifications are consistent. Suggested that option 2 being consistent with tourism strategy is contradicted in justification.

**Supporting Good Design and Place Making**

Department seeks clarification as to whether this issue has been considered within the strategic objectives or overarching principles of the Plan.

**Transportation and modelling unit.** Missed the opportunity to address how transport can contribute to place making. For example, it is suggested that parking has the potential to contribute to place making. Opportunities to achieve this are linked to the Local Transport Plan process – eg the relocation of car parking to reduce vehicle dominance in town centres.

**Carried Forward**

These should take account of Strategic Objectives and Vision, with regard to plan evidence and regional policies etc. DFI seek clarification of what assessment of retained policies has taken place. There is a need to note the impact of the SPPS on the policies within PPS5. All carried forward policy options should be taken through the SA/SEA process. Council will have to provide evidence of this assessment.

**Transportation and modelling unit.** Accessibility analyses, although featuring in PPS13, was not widely adopted universally. The Department is keen for accessibility analyses to be used more widely in the development of the Local Development Plan.

	<p>The Sub Regional Transport Plan should be treated as the current transport proposals for the area as it will remain extant until such time as the a new local transport study has been agreed for the area.</p> <p><b>Transport NI.</b> Bus routes/rail routes and general access to public transport should be reflected in the consideration of zonings within LDPs. Parking policies for towns will be a key aspect of transport plans and will impact on considerations for new car parks within LDPs.</p> <p><b>Rivers Agency.</b> Set out what the Local Plan Policies will do and advise caution at this stage as the policies have not been drafted. Once these have been drafted they will have to be examined in detail for any omissions or departures from the SPPS.</p>
<p><b>Department for Economy –Minerals and Petroleum Branch/GSNI</b></p>	<p><b><u>Minerals Development</u></b></p> <p>The DfE does not agree with the preferred option as it does not adequately take account of the economic value of minerals or address the points by DfE/GSNI in previous responses and in discussions with FODC.</p> <p>Welcomes option 1 and also welcomes the recommendation in Option 3 to identify areas for safeguarding minerals within the plan area. DfE questions the additional constraints proposed in Option 2 which does not seem to be compatible with the minerals strategy established in the SPPS (Para 6.155 and Para 6.157) or PSRNI (MIN4).</p> <p>The Department wishes to seek clarity on the evidence base for the proposed 15 year restriction on mineral development in the proposed areas of constraint. DfE believes that each proposed mining development should be assessed on its own merits through the planning process. If a mine development receives planning permission it seems illogical to place an arbitrary time limit on mining operations which would be well below the economic lifespan of that mine. DfE cite examples of mines which have been in operation periods of years.</p> <p>Would appear that the Preferred Options Paper is based on an understanding of the aggregate industry based on the long history of extraction from hard rock quarries and sand &amp; gravel pits in the Council area. The Preferred OP does not reflect insight into the nature of exploratory works for high value minerals. POP reveals little experience or knowledge of the development of high value minerals by underground mining given the lack of such operations in the council area within recent years. Little information is provided in relation to oil and gas. A distinction should be made between exploration for,</p>

	<p>and extraction of, unconventional hydrocarbons, such as shale gas, and conventional oil and gas because the scale and methodologies of these are quite different and raise quite different sustainability issues.</p> <p>DfE - preferred options would benefit from modification to take account of the differences in the exploration and development in 3 main categories – low value aggregates, high value metalliferous minerals and energy minerals.</p> <p>The DfE would recommend that the POP is revisited in light of this additional information and subject to further engagement with DfE/GSNI on safeguarding of minerals.</p> <p><b>Question 9b: Are there any other areas that should be considered as Areas of Constraint on Mineral Development?</b></p> <p>DfE do not support further constraint on mineral development, in particular in relation to UNESCO Geopark. Geoparks are not a statutory designations and should not restrict planning and development providing the main geological heritage of a UNESCO Global Geopark is maintained and protected. This should be achieved on a site by site basis and not applied to an entire area. DfE reference extracts from a UNESCO publication <a href="http://unesdoc.unesco.org/images/0024/002436/243650e.pdf">http://unesdoc.unesco.org/images/0024/002436/243650e.pdf</a> in relation to Sustainable Development and Natural Resources. DfE have highlighted that under natural resources it is stated that : “UNESCO Global Geoparks inform people about the sustainable use and need for natural resources, whether they are mined, quarried or harnessed from the surrounding environment, while at the same time promoting respect for the environment and the integrity of the landscape.”</p> <p>In addition to their representation on the POP, DfE have produced a document titled Information on Minerals Development to Inform Local Council Preferred Options Papers. Specific reference is made to reserves within the FODC area, ie gold and gas.</p> <p>DfE disagrees with time limiting permissions, stating this is both arbitrary and unnecessary.</p> <p>*Also notes there may be potential for conventional production from some sandstone units in the NWCB but this is likely to be very limited.</p>
<p><b>Northern Ireland Environment Agency</b></p>	<p>Welcomes the preferred options which seek to recognise and protect the quality landscapes of the area and protect them from development (minerals development, renewable energy, tourism and supporting good design). NIEA are concerned at</p>

the absence of a separate section within the POP on the natural environment. Comments that it is not clear how the capacity to absorb development has been assessed.

Concerned at omission of proposed AONBs for the Fermanagh Caveland and Erne Lakeland as these are important natural assets.

In regard to LLPAs, notes that existing designations will be reviewed and comments that the methodology for identifying them has improved over time and that an LLPA policy will need to be included in the Plan.

They note that there is no need to identify new housing land through extension of settlement limits and suggest that previously zoned housing land may be more suitable for open space/recreational or Development Opportunity Sites.

### **Spatial Growth Options**

Supports Option 3 in principle but with a caveat on the percentage growth to be allocated to smaller settlements and the open countryside. The proportion allocated for housing across the countryside is a concern and would query whether the proportion to the Main Towns is consistent with the RDS.

### **Development in the Countryside**

Supports, in principle, the zoning of the countryside into zones that can accommodate and absorb development without detriment to biodiversity and landscape. Suggests that buffer zones around European sites and known priority habitats, should also be excluded from RPAs.

### **Addressing Deprivation/Regeneration in Urban and Rural Areas**

Supports preferred option for urban areas with caveat that any environmental constraints are sustainably addressed. Supports Option 1 for Rural Areas but with a focus on RPAs.

### **Minerals Development and Renewable Energy**

Supports in principle the preferred option for each subject to addressing any environmental or landscape constraints.

### **Tourism**

	<p>Supports, in principle, the designation of Tourism Conservation Zones but suggests they should be carefully chosen with attention to 'exact' boundaries. Tourism development outside a TCZ should not necessarily be a given. The location of 'Visitor Hubs' needs to be carefully chosen and adequately address any environmental constraints (NIEA would wish to comment on the locations of them)</p> <p><b><u>Lakes and Waterways</u></b> Supports Option 1.</p> <p><b><u>Supporting Good Design and Place Making</u></b> Supports the preferred option.</p> <p><b><u>Carried Forward Policies</u></b> Notes intention to carry forward Policies NH1-NH6</p>
<p><b>Historic Environment Division</b></p>	<p>HED advise that they have serious concerns that merging existing policies for archaeological sites and monuments and for listed buildings into two block policies, would change emphasis and create significant confusion in the approach to the protection of heritage assets. It could lead to contravention of legislative protections and failure to meet obligations under international conventions on the protection of built and archaeological heritage. Considers that existing policies are clear and provide for a hierarchy of protection in relation to both archaeology and built heritage.</p> <p>Response to specific questions in the POP were made as follows:</p> <p><b>Q1</b> In relation to environmental objective i), HED recommend that this concludes with built heritage and archaeological heritage, to more fully encompass the range of heritage assets within the district.</p> <p><b>Q3, Q5, Q7 &amp; Q8</b> HED agrees with preferred options for Spatial Growth, allocation of economic development land and addressing deprivation/regeneration in rural/urban areas. However, recommends that development proposals for new retail and services provisions might also include the sustainable re-use of older/vernacular buildings which have some local heritage interest, in accordance with SPPS.</p> <p><b>Q10</b> Agrees with preferred option for renewable energy.</p> <p><b>Q12, 13 and 14</b> Careful consideration should be given to development of tourism facilities in order to protect and conserve heritage assets and to comply with SPPS policies on the protection of archaeology and built heritage.</p>

**Q15** Agrees with general approach to lakes and waterways but would advise that account should be taken of impacts on heritage assets and their settings and shipwrecks. Fermanagh has a huge corpus of freshwater archaeology including very many crannogs.

**Q16** Agrees with preferred option for supporting good design and placemaking.

**Q17** Suggests that Candidate ASAs identified by HED which lie within or partially within the Council area should be designated. The Gazetteer of Nucleated Historic Settlements will be a useful tool for the LDP. This will also assist in the definition of town centres and potentially help inform ATCs. Some text in relation to each zone identified and the history of the settlement will be provided by HED.

**Q18** Recommends use of their GIS spatial data to identify sites of heritage interest within and adjoining settlements to inform the designation of LLPAs. Careful account should be taken of the setting of heritage assets.

**Q19** With regard to control of outdoor advertisements, significant consideration should be taken in regard to the design, scale, material and illumination of outdoor advertisements, especially where it relates to affixing to or within curtilage of a listed building, protected area of scheduled monument or State Care monument and large scale advertisement proposals within 50m of setting of a listed building or site of scheduled monument or 100m for State Care monument.

**Q27** In relation to opportunity/vacant sites in Enniskillen and Omagh, KSRs should provide for appropriate impact assessments where such sites lie within Areas of Archaeological Potential. Where they lie within the setting of listed buildings, they should respect the character of such buildings, its setting and material, scale, height, massing and alignment. HED also highlighted a number of matters as potential policy gaps, which supplementary policy to the policies in SPPS could help to address. These included:

- specific changes to wording to provide enhanced clarification of policy;
- there should be inclusion of 'heritage-led' approaches to redevelopment proposals within ATCs and demolition of listed buildings;
- reports to justify demolition should be from conservation accredited professionals (engineers, architect and/or surveyors);
- use of best practice BS 7913;
- the understanding of 'setting' should be as set out in PPS 6;
- ensure non-listed vernacular buildings are afforded adequate protection and recognition and that evidence for their demolition should be from suitably accredited backgrounds.

	<p>HED's comments also provided links to useful information to use as a resource base for LDP preparation. They will assess via a risk based approach what level of site specific analysis and advice can be provided to Councils on historic environment related matters during the preparation of development plans.</p>
<p><b>Northern Ireland Housing Executive</b></p>	<p><b>Summary of Comments from NIHE (Online Questionnaire)</b></p> <p><b>Q1</b> Whilst generally supportive of the strategic objectives, NIHE would seek amendment to the social objective (iv) in order to recognise the housing needs of our whole society by including an acknowledgement of the need for affordable housing and provision of mixed tenure, as set out in the SPPS.</p> <p><b>Q2</b> Agrees with settlement hierarchy.</p> <p><b>Q3</b> In relation to Spatial Growth Options, NIHE would like to see a revised option 3 which includes 'balanced growth across the small towns, villages and small settlements.' They are concerned at the inclusion of accommodating small groups of houses within the countryside as development within the open countryside should be limited as it is contrary to sustainable development.</p> <p><b>Q4</b> In relation to the Housing Allocation, NIHE disagrees with the Preferred Option 3 and seems to suggest that this would allocate three times as many houses to the open countryside as to the local towns. It would also like to see a higher proportion allocated to the towns, villages and small settlements rather than the open countryside. Considers that each of the options conflict with the LDP's strategic objectives. Considers that the LDP should curtail the growth of single dwellings in the countryside and that sustainable residential development should primarily occur within settlement development limits in order to promote connectivity and more sustainable patterns of travel. A revised Option 3 as per these suggestions would be better aligned with the RDS., the SPPS and Sustainable Development Strategy.</p> <p><b>Q5</b> Disagrees with Preferred Option for Economic Development Land Allocation in that the allocations should be revised to align with the housing allocations proposed in their response to Q4. Would like to see the Council considering the inclusion of simplified planning zones for economic development in Enniskillen and Omagh.</p> <p><b>Q6</b> Disagrees with Council's preferred option for sustaining rural communities. Requires further clarification on Rural Diversification Areas, the number and extent of RDAs and the level of relaxation of policy intended. Emphasises the need again to see development directed primarily to settlements, with SCAs designated for sensitive landscapes and the remaining countryside subject to the provision of PPS 21. If RDAs are taken forward, they should be based on robust evidence of decline, they should be small scale and outside environmentally sensitive areas. The focus of development in RDAs should be upon economic opportunities and service provision rather than residential development.</p>

**Q7** Supports the Preferred Option in relation to addressing deprivation/regeneration in the urban area.  
**Q8** Disagrees with the Preferred Option. Would require further clarification on RDAs as per response to Q6.  
**Q10** Agrees with Preferred Option.  
**Q11** Disagrees with Preferred Option. Considers that the use of renewable energy and passive solar design should be encouraged for all developments, not just public sector. Would like Option to be revised to include all developments and seeks clarification about the thresholds to be applied for each category of development.  
**Q11b** Would like clarification on proposed thresholds and states they do not relate directly to those set out in the Development Management Regulations 2015.  
**Q12** Agrees with Preferred Option but suggest that the overarching tourism policy could be in conflict with the proposed policy for RDAs.  
**Q14** Agrees with Preferred Option but notes that there may be potential conflict between these areas and RDAs where the designation could overlap.  
**Q16** Agrees with Preferred Option.  
**Q16b** Agrees with Preferred Option.  
**Q27** Vacant sites within the town centres should be zoned as opportunity sites and incorporate town centre living initiatives e.g. LOTS  
No comment made on remaining questions.

**Summary of Comments received from NIHE (Supplementary Statement)**

NIHE endorses the overarching principles set out in the FODC LDP. Under the heading, 'Design led approach', they advocate that a high quality design is essential in all developments and refers to PPS 7 Addendum Safeguarding the Character of Residential Areas for which NIHE has similar standards and also advocates the use of the Lifetimes Homes Standard, to provide housing suitable to meet the changing needs of the population, particularly the elderly.

**Future proofing and design to minimise energy usage and CO2 emissions**

- Energy efficiency should be delivered in a 3-tiered response, firstly to reduce demand, secondly to improve energy efficiency (more insulation) and finally provide renewables where applicable.

**Protect and enhance the natural environment**

- Maximise housing development on brownfield land and land within the urban footprint.

**High Quality Open Space**

- New development should usually conserve wildlife habitats, existing trees and quality vegetation and promote further biodiversity by providing open space with uncultivated areas and green corridors.
- New development should consider the creation of allotments and community gardens; planting of native species; promotion of tree-lined streets.

**Placemaking**

- NIHE supports LDP's commitment to a 'placemaking' approach. This allows a joined up method of working with other council functions such as regeneration, tourism, economic development and community planning.

**Connectivity**

- Future housing developments should be concentrated in locations with good access to public transport, walking and cycling facilities
- Consideration should be given to the layout of a development so it maximises the number of homes within a short distance to the nearest bus stop
- Developments which reduce car dominance in local streets, encourage pedestrian and cycle journeys, make it safer for children to walk to school and play outside, should be promoted.

**Windfall Sites and Unzoned Land**

- A policy should be included in the LDP to allow for windfall sites that may come forward during the plan period
- A policy should be included to allow for the flexible development of sites where, for example, the site is not zoned within the LDP, subject to criteria including sustainability of the site for the development proposed. This policy could also be applied where there has been a change in circumstance in relation to a zoned site.

**Housing**

NIHE expressed disappointment at the lack of specific policies on housing issues in the POP. They provided comments on housing under the following sub-headings:-

**Housing Land Availability**

- Identify housing land which is readily available
- An assessment of "fitness for purpose" of existing zoned land should be undertaken, as for existing zoned economic development land.

**Mixed Tenure**

- Increase sustainability through building balanced communities where people from different backgrounds can live together, strengthening economic sustainability, community cohesion and reducing social exclusion
- Use of development management policy for the delivery of affordable housing through the LDP
- Housing delivered in mixed tenure developments should be 'tenure blind.'

#### Affordable Housing

- The LDP needs to recognise the range of housing tenures – social, intermediate and private
- A comprehensive affordable housing policy should be included in the Plan which sets out the policy approach in urban and rural areas.
- Definition of affordable housing should be as defined in the SPPS – social housing and intermediate housing
- Use of development management policy, similar to HOU2 in the current Northern Area Plan.

#### Wheelchair Housing

- Given increasing numbers of people with a disability, the LDP should seek to support housing that caters for the needs of wheelchair users by ensuring that a minimum of 5% of private units within major developments are designed to wheelchair standard. There may need to be different thresholds in FODC.

#### **Developer Contributions**

- NIHE strongly supports the LDP overarching principle requiring developers to bear the cost of work required to facilitate development
  - Supports introduction of developer contributions policy for provision of affordable housing
- #### Supported Housing
- Supported housing is for individuals who cannot live independently in their own home. This can be self-contained or shared accommodation.
  - A development management policy for supported housing should be included in the LDP

#### **Carried Forward**

- In reference to PED 7 of PPS 4, requests that consideration be given to amending this to allow for residential development on appropriate sites
- Welcomes retention of PPS 21, particularly policy CTY 5, to allow for the development of small groups of affordable housing.

	<ul style="list-style-type: none"> <li>• Welcomes retention of PPS 8. Would welcome acknowledgment that social housing is a “substantial community benefit” under policy OS1</li> <li>• NIHE thought that PPS 12 Housing in Settlements had not been brought forward. This is not the case.</li> <li>• Strongly supports measures in the Plan to support good design and place-making. Requests that in addition to Living Places and Building on Tradition that Creating Places and the DCANs should also remain as material considerations in the assessment of planning applications. Lifetime Homes Standard and Secured by Design Standard should also be included. Suggests that a comprehensive review of policies contained within the design guidance highlighted, should be carried out to clarify and bring together those aspects which the Council wishes to retain.</li> </ul>
<p><b>SONI</b></p>	<p>SONI supports and welcomes the Council’s strategic economic objective in the POP: “(v) To accommodate investment in public utilities infrastructure, and waste management.”</p> <p>Referred to PRE-POP submission in June 2016 which includes information on the indicative nature and extent of future developments in the Council area. (See Pre-Pop comments/insert table etc)</p> <p>RDS contains policies which could form the basis of new policies and objectives in the LDP, including ‘RG5: deliver a sustainable and secure energy supply’.</p> <p>SONI have provided the following suggested text for inclusion in the LDP: <i>“Northern Ireland needs a robust and sustainable energy transmission and distribution infrastructure network. This infrastructure will deliver reliable and secure sources of electrical energy to communities and businesses across the Region and improve connectivity with and linkages to areas outside the Region. The planning and development of Grid infrastructure by SONI over the period of the Plan (including the provision of new infrastructure, works proposed to strengthen the existing grid and the development of Smart grids) are recognised as key to achieving this objective and are supported in this Plan. New energy infrastructure must be carefully planned and assessed to avoid adverse environmental effects, particularly on or near protected sites and areas of landscape sensitivity where possible including AONBs. At the plan level this will require a Strategic Environmental Assessment; at the project level this may require an Environmental Impact Assessment and a Habitats Regulation Assessment to identify effects and appropriate mitigation.</i></p>

	<p><i>This will ensure that the Fermanagh and Omagh Council area develops and maintains a safe, secure, reliable energy infrastructure network which in turn will ensure the area has access to reliable sustainable energy supplies to support economic growth and connectivity. It will also assist in maximising the area's significant renewable energy resource. This will support the realisation of policies and objectives in the Regional Development Strategy 2035."</i></p> <p>SONI comment that it is unnecessary to reference the need to comply with ICNIRP, as this is already a recognised requirement beyond planning.</p>
<p><b>Invest NI</b></p>	<p>Invest NI provided some general comments on the POP as a whole, augmented with specific replies to appropriate elements of the questionnaire.</p> <p><b><u>General Comments</u></b></p> <ul style="list-style-type: none"> <li>• Argues that the requirement for developers to bear the cost of work required to facilitate development proposals (7<sup>th</sup> Overarching Principle) should not apply to public sector developments where wider societal benefits are the driving force rather than profit. Such additional cost also has the potential to adversely affect project deliverability.</li> <li>• Points out that the statement in paragraph 5.18 of the POP, is an inaccurate representation of Invest NI's position, in that they only intervene in the commercial property market to buy and develop land where the private sector is not willing to do so, and not that they specifically require additional land for their clients.</li> <li>• Welcomes the carrying forward of the existing provisions of PPS 4 Planning and Economic Development.</li> </ul> <p><b><u>The Vision and Strategic Objectives</u></b></p> <ul style="list-style-type: none"> <li>• In relation to the number of jobs to be created, it would be useful for the Council to elaborate further on these and how they envisage this target is to be achieved and whether they are across growth sectors or the economy as a whole.</li> </ul> <p><b><u>Economic Development Land Allocation</u></b></p> <ul style="list-style-type: none"> <li>• Notes the Council's preferred option and the potential for new employment zonings that the proposed A4/A5 upgrades may release.</li> </ul> <p><b><u>Development in the Countryside</u></b></p> <ul style="list-style-type: none"> <li>• Agrees with preferred option.</li> </ul>

	<p><b><u>Economic Development – Addressing Deprivation/Regeneration in the Urban Areas</u></b></p> <ul style="list-style-type: none"> <li>Notes the quantum of land the Council intends to zone for industry and business and additionally identifying vacant or underused land in disadvantaged areas in the two main towns. Seeks a definition on the terms “vacant” and “under used”. Invest NI would not consider its land within the Plan area to be either vacant or under used.</li> </ul> <p><b><u>Economic Development – Addressing Deprivation/Regeneration in the Rural Area</u></b></p> <ul style="list-style-type: none"> <li>Comments are a duplication of those made to Main Issue 5 and do not therefore specifically address this issue.</li> </ul> <p><b><u>Integrated Renewable Energy and Passive Solar Design</u></b></p> <ul style="list-style-type: none"> <li>Seeks clarification on paragraphs 9.16 and 9.17 (LDP comment - this is self-explanatory to anyone reading it) and what the Council envisages as public sector development. Again, concerned about impact on developments where wider societal benefits are the driving force rather than profit.</li> <li>Also requests clarification in relation to thresholds and the type of developments they would apply to. Considers that separate thresholds for different types of development may prevent imposition of an over-onerous constraint.</li> </ul> <p><b><u>Supporting Good Design and Place Making</u></b></p> <ul style="list-style-type: none"> <li>Agrees with Council’s preferred option.</li> </ul> <p><b><u>Carried Forward Planning Policies</u></b></p> <ul style="list-style-type: none"> <li>In relation to town centres, considers that the town centre boundary in Omagh should be amended and that areas excluded from development by PPS 15 should be provided for elsewhere.</li> <li>Supports the re-use of buildings within settlements for modern business purposes. Employment generated from these can bring new footfall and add vibrancy to the retail and hospitality business in the town centres.</li> </ul>
<p><b>Department for Communities Ministerial Advisory Group</b></p>	<p>The response relates to specific questions in the POP which relate to Architecture and the Built Environment. MAG would welcome the opportunity to meet and discuss further any of the points raised.</p> <p><b>Q1</b> In relation to the Vision, comments that it is brief and whilst there is great emphasis on sustainability, more is required about Sustainability Transport and Active Travel. The Strategic Objectives are clear and comprehensive.</p>

	<p><b>Q3</b> Does not agree with preferred option for Spatial Growth Strategy. Considers it is unbalanced to allocate 3,114 houses to the two main hubs and 1,407 to the countryside. The allocation for smaller towns, villages and small settlements provides for good design, connectivity and linkage. None of the options take account of improving the settlements that are already in place.</p> <p><b>Q6</b> Does not agree with preferred option for sustaining rural communities. Considers that further more detailed analysis would be required. Option 2 should mention policies to control siting, design guides and development control advice notes.</p> <p><b>Q8</b> Does not agree with preferred option for addressing deprivation/regeneration in rural areas as needs further detail on the proportion of the countryside. Option 2 is preferred option and suggests examples of types of small businesses and business use classes compatible with housing and surrounding rural area.</p> <p><b>Q16</b> Broadly in agreement with Option 3 regarding supporting good design and place making and offers additional points for consideration and further discussion e.g. the beneficial impacts of good standards of civic stewardship in areas of low employment/multi-deprivation.</p>
<p><b>City of Derry and Strabane Council</b></p>	<p><b><u>Development in the Countryside</u></b></p> <ul style="list-style-type: none"> <li>• Notes the preferred option to designate tiers of Countryside/Rural protection areas and stricter policy control in sensitive landscapes.</li> </ul> <p><b><u>Economic Development</u></b></p> <ul style="list-style-type: none"> <li>• Notes the preferred option for deprived urban areas which will assist in the regeneration of such areas</li> <li>• The targeted approach to rural areas is considered a sound approach based on the supplied evidence.</li> </ul> <p><b><u>Mineral Development</u></b></p> <ul style="list-style-type: none"> <li>• Derry and Strabane faces similar issues in terms of minerals development and would concur with the preferred option.</li> </ul> <p><b><u>Renewable Energy</u></b></p> <ul style="list-style-type: none"> <li>• Agree with the preferred option to retain existing policy provisions but introduce a stricter policy regime in terms of protecting sensitive landscapes.</li> <li>• Also supportive of the preferred option for Integrated Renewable Energy and Passive Solar.</li> </ul>

	<p><b><u>Tourism</u></b></p> <ul style="list-style-type: none"> <li>• Supportive of all preferred options in relation to tourism.</li> </ul> <p><b><u>Supporting Good Design &amp; Place Making</u></b></p> <ul style="list-style-type: none"> <li>• Considers that the Living Places document is 'light' in its ability to deliver change but agrees the 10 qualities should be integrated into LDP preparation and policy. Supportive also of an integrated approach to supplementary planning design guidance by adjacent AONB councils.</li> </ul> <p><b><u>Carried Forward Policies</u></b></p> <ul style="list-style-type: none"> <li>• Notes the contents of this section.</li> </ul> <p>Concludes by advising of future consultation with FODC via 'Adjoining Council Stakeholder Group'.</p>
<p><b>Mid-Ulster Council</b></p>	<p>The following comments concern those matters considered to be of cross boundary interest.</p> <p><b><u>Minerals Development</u></b></p> <ul style="list-style-type: none"> <li>• MUDC welcomes the concept of the ACMDs and should the preferred option be chosen, that they work with FODC on the development of ACMDs which are contiguous across council boundaries.</li> </ul> <p><b><u>Renewable Energy</u></b></p> <ul style="list-style-type: none"> <li>• MUDC support the Council's preferred option but feel it could go a step further by taking into account the potential detrimental impact that high structures such as overhead powerlines and telecommunications development, could have on our shared landscapes. MUDC considers that the Sperrin AONB and Clogher Valley are important shared landscapes. Again, they would welcome the opportunity to work with FODC on the development of ACMDs which are contiguous across council boundaries.</li> </ul> <p><b><u>Tourism</u></b></p> <ul style="list-style-type: none"> <li>• Welcomes the designation of Tourism Conservation Zones.</li> <li>• Considers that any Tourism Opportunity Zones should be focused on recognised tourism attractions and are sensitively located.</li> </ul> <p><b><u>Development in the Countryside</u></b></p>

	<ul style="list-style-type: none"> <li>• MUDC notes the approach to development in the countryside and the rationale for the preferred option.</li> </ul> <p><b><u>Economic Development – Addressing Deprivation/Regeneration in the Rural Area</u></b></p> <ul style="list-style-type: none"> <li>• The approach to economic development is noted.</li> </ul> <p><b><u>Archaeology and Built Heritage</u></b></p> <ul style="list-style-type: none"> <li>• Consideration should be given to linking with Beaghmore ASAI so that it extends into the FODC area.</li> </ul>
<p><b>Causeway Coast and Glens</b></p>	<p>Causeway Coast and Glens(CCG) acknowledge the strategic nature of the Preferred Options Paper, and its purpose to stimulate focussed debate on a wide range of planning issues affecting the district.</p> <p>CCG agree with the options presented in relation to the Strategic Growth Options, and the main issues options. Within the Carried forward section a number of suggestions have been made in regard to The Control of Outdoor Advertisements, Telecommunications, and suggested primary retail cores for Enniskillen and Omagh.</p>
<p><b>SSE</b></p>	<p><b>Comments from JLL (Jones Lang LaSalle) on behalf of SSE Renewables</b></p> <p>Whilst some of the preferred options are supported, there are significant concerns regarding others which do not properly reflect important elements of extant planning policy and advice.</p> <p><b><u>Spatial Portrait and Regional Policy Context</u></b></p> <ul style="list-style-type: none"> <li>• Due to the size of plan area and the low dispersed population levels, in principle, the area should aim to provide a major contribution to Northern Ireland’s renewables targets through an enabling framework. It is recommended that the spatial portrait within the LDP should recognise this as well as the fact that Northern Ireland has one of the best wind resources in Europe and accordingly has significant social, economic and environmental value that could be harnessed through the deployment of onshore wind.</li> <li>• Considers that there is a protectionist policy approach in the POP with a presumption in principle that wind sites should not be permitted in sensitive landscapes such as AONBs. This is inconsistent with the aims of the RDS and its encouragement for further deployment of renewable energy development.</li> </ul> <p><b><u>The Vision and Strategic Objectives</u></b></p>

- The 'Social' objectives should recognise that renewables development including onshore wind energy development can assist in providing opportunities for recreation and the delivery of local projects.
- In terms of Position Paper 7 Tourism and Paper 15 Development Pressure Analysis, it is noted that there is no identified pressure or perceived conflict between onshore wind energy development and tourism related land uses or interests.
- The 'Economic' objectives should include the accommodation of investment in renewable energy development, alongside public utilities infrastructure. Both the SPPS and RDS acknowledge the economic benefits of renewable energy in terms of jobs and opportunities. Cites the proposed Doraville Wind Farm 'Doraville Area Grant Scheme' as a means to enhance the tourism and recreational economy as the Grant Scheme seeks to fund the 'Sperrins Outdoor Recreation Action Plan'.
- The 'Environmental' objectives should support new development which contributes to meeting climate change targets. The RDS and SPPS both recognise that renewable energy reduces dependence on fossil fuels and helps achieve targets for reducing carbon emissions.
- Seeks a more supportive policy framework for onshore wind energy development within the LDP.

#### **Spatial Growth Options**

- Recommends that the spatial strategy for the FODC area provides no form of moratoria on where onshore wind development can or cannot take place.

#### **Sustaining Rural Communities**

- Does not agree with preferred option. Considers that the existing policy framework which is proposed to be brought forward, as recognised in Appendix 2 to the POP, makes adequate provision for new development in the countryside and already allows for the character of the countryside to be taken into account in development management decisions.
- The preferred option adopts a protectionist approach to designate SCAs, RPAs and Remaining Countryside Areas. There is no evidence base to support this approach.
- The LDP would benefit from recognising that the development of onshore wind energy development can assist with the aim of sustaining rural communities.

#### **Addressing Deprivation/Regeneration in the Rural Area**

- Subject to their comments on Main Issue 4, the preferred option relating to this issue is endorsed, in so far as it supports appropriate economic development in the countryside generally. It is not accepted that the designation of SCAs should be taken forward.

### **Overarching Policy for Renewable Energy Development**

- They object strongly to the preferred option (Option 2) and Option 1. Considers that there are significant inconsistencies between the Preferred Option, other objectives of the POP, the proposed policy approach set out within the Summary of Carried Forward Policies and the regional planning policy approach.
- Both Options 1 and 2 seek to introduce a blanket ban on new development consisting of wind energy, on landscape and visual grounds, which is inconsistent with PPS 18, the SPPS and RDS. They refer to Policy RE 1 of PPS 18 which presumes against development only where unacceptable impacts on specified resources would occur. There is no suggestion that area-wide prohibitions on development would be appropriate.
- Likewise, PPS Natural Heritage provides a criteria-based policy approach for the assessment of potential development impacts on an AONB. It does not presume against any form of development within AONBs.
- They consider that the way Position Paper 14 Landscape Character Assessment has been interpreted by Main Issue 8 is incorrect. This is further amplified in Appendices 1 and 2 of their submission.
- It would be fundamentally contrary to the SPPS to impose a prohibition on wind farm development with no potential for the individual circumstances of any particular case to be taken into account as part of the policy.
- The LDP should also embrace the advantages of Re-powering renewable energy projects. Maintaining low carbon renewable energy generation at existing wind farm locations where mitigation is proven is clearly highly desirable and is a concept supported in Scottish Planning Policy.
- Allowing amendments to windfarm layouts, to support the co-location of other forms of low carbon generation or technologies which may increase the efficiency of an existing renewable technology should also be embraced and built into policy and guidance to enable more efficient, lower cost, stable energy generation in the future through the later inclusion of increased efficiency technologies.
- Recommends that the LDP should seek to provide an enabling policy framework in all respects to assist the further deployment of wind energy development and that the LDP should retain the existing policy approach set out in PPS 18.

### **Overarching Tourism**

- They do not support the Preferred Option and presenting one option without any alternatives is inappropriate.
- To apply Tourism Conservation Zones without a proper evidence base could be detrimental to the economic development of the plan as a whole.

	<ul style="list-style-type: none"> <li>• Makes reference to 'Wind Farms and Tourism Trends in Scotland: A Research Report (July 2016, Biggar Economics) which concluded that wind farms do not cause a reduction in tourism employment at both a local authority and national level.</li> <li>• Points out that Position Paper 7 Tourism does not recognise a specific conflict between developing the tourism economy and the further deployment of onshore wind energy development.</li> <li>• Recommends that Tourism Conservation Zones should not be developed and instead, a policy approach that recognises how recreation and tourism interests can be enhanced by appropriate development proposals should be progressed.</li> </ul>
<b>Gaelectric</b>	<p>The FODC Preferred Options paper will be highly damaging to the future of wind energy in the district and will put at risk attaining the 40% SEF target and impact on the positive economics arising from wind development.</p> <p>Strategic importance of promoting the generation of energy through renewable sources and reducing greenhouse gas emissions is firmly established within policy and is further strengthened by the UK's ratification of the Paris Agreement.</p> <p>Strategies include:</p> <ul style="list-style-type: none"> <li>• UK renewable energy strategy 2009 and National Renewable Energy Action Plan 2010 – strategy states that there needs to be an increase in the use of renewable electricity, heat and transport. It sets out the path to meet the target to ensure 15% of the UK's energy comes from renewable sources by 2020</li> <li>• NI Strategic Energy Framework (SEF) 2010 – target to increase the amount of energy consumption from renewable sources to 40% in Northern Ireland by 2020. The achievement of this target requires significant investment in renewable energy infrastructure.</li> <li>• RDS – development of Northern Ireland's renewable energy sources is vital to increase its energy security, help combat climate change and achieve the renewable energy targets.</li> </ul> <p>Renewable energies, in particular wind energy, have a key role in:</p> <ul style="list-style-type: none"> <li>• Enhancing the competitiveness and attractiveness of Northern Ireland as a region to do business and invest in. Infrastructure is a key determinant for investors (foreign and indigenous) when it comes to making investment decisions.</li> <li>• Helping safeguard the security of our energy supply system and maintaining network reliability; promoting sustainable development and harnessing the natural resources that the area has; along with the</li> <li>• Wider environmental, economic and social benefits of all proposals for renewable energy projects (to include: job creation, cleaner energy, community funds, tourism potential etc.)</li> </ul>

### **Vision and Strategic Objectives**

Are generally in agreement with the vision and strategic objectives however consider they could be broadened and strengthened as set out below:

Social Objectives -Renewable projects, especially wind farms have significant social benefits in sparsely populated, economically disadvantaged areas eg. through local employment during and after construction phase. Gaelectric have referenced Slieve Kirk Wind Park as an example, citing a contribution of £36 million to the local economy supporting local businesses, jobs and enterprises. Community funds contribute to social and community services in the form of grants to local clubs and societies which act as important social outlets for what are often remote rural areas.

Economic Objectives -Renewable projects have the potential to stimulate enterprise and employment in the most 'deprived' areas particularly during construction phase. Wind farms can improve physical connectivity through works to improve the public road infrastructure in the areas in which they are located. Wind farms have provided significant economic stimulus to Northern Ireland. In 2012 1,300 people were employed in the wind industry which is expected to rise to 2,000 by 2020. It is estimated that 49% of the capital spend of wind farms is kept in Northern Ireland. This translates to an investment of £1.18m/MW of wind farms installed into the Northern Ireland economy over development, construction and operational stages.

Gaelectric set out the wider benefits of wind energy to Northern Ireland in relation to rates payments, community benefit, reduction in wholesale electricity with wind energy displacing fossil fuel driven technology, and the benefit of enhanced security of supply for the Northern Ireland consumer, and an indicated £61.5m boost to the NI economy.

### **Spatial Growth Options**

Gaelectric agree with the preferred spatial growth option and comment that renewable projects have an important role to play in revitalising small towns and villages in the form community funding and associated economic activity. They suggest that a renewable energy hub such as the new maintenance centre in Coleraine could provide opportunity in one of the two main towns for major employment. Gaelectric advise that there is over 150MW of wind in operation in the FODC area with a number of projects in construction and other unimplemented permissions.

### **Housing Allocation**

Gaelectric do not agree with the Council's preferred option, instead indicating that it would be more appropriate to focus on the main hubs in line with the RDS. This would allow the construction of houses close to existing services and infrastructure.

### **Economic Development Land Allocation**

Development that is weighted towards the hubs whilst not omitting rural areas is a sensible approach. There are a number of renewable energy companies working in omagh which could be leveraged with the creation of a centre of excellence potentially in collaboration with SW College in Omagh who currently offer renewable energy courses. Wind farm operators are in demand in the North and Omagh is centrally located to take advantage of this form of employment.

### **Development in the Countryside**

Gaelectric do not agree with the Council's preferred option. They consider that the identification of SCAs would introduce a constraint which would unnecessarily rule out potential development in rural areas. Adoption of this approach could impede the successful allocation of economic land outside of the hubs.

It could have the effect of ruling out existing operating sites for repowering in the near future when the current turbines are past their design life which would impact on NI's targets laid out in the Strategic Energy Framework.

This would have a detrimental effect on the further development and strengthening of the electricity grid which would be contrary to the RDS.

### **Economic Development: Addressing deprivation/regeneration in rural areas.**

RPA/RCA/SCA designation is unduly restrictive to wind energy development as the resource is typically of a higher quality in more remote rural areas.

### **Overarching Policy for Renewable Energy Development**

Do not agree with the Council's preferred Option. The SPG gives clear national guidance on the siting of wind farms in the landscape and should be maintained as the reference document on landscape issues. Detrimental impact on both new and old wind farms being repowered with the knock on effect of losing clean energy generation in contravention of the Strategic Objective to promote positive action on climate change.

### **Integrated Renewable Energy and Passive Solar Design**

Agree with the preferred option and consider that a threshold of 500m<sup>2</sup> should be applied.

### **Overarching Tourism**

Do not agree with the preferred option. Adding further landscape protections for tourism could rule out suitable areas for new wind farms and repowering of older projects which would impact on achieving renewable targets.

### **Operational Tourism**

Gaelectric have indicated that community funding from wind farms have been a source of funding for tourism, both directly and indirectly. Examples of local communities seeking to make their area more attractive to tourists.

Do not agree with the preferred option for operational tourism.

Wind farms and tourism can exist together for mutual benefit as demonstrated in Scotland. Working together FODC and renewable developers could develop a similar scheme that benefits rural areas that are often overlooked.

A visitor centre on a large wind farm would be a positive contribution to FODC tourism objectives.

### **Supporting Good Design and Place Making**

Do not support the Council's preferred option. Gaelectric state that " The overarching policy SPPS states 'Design is not limited to the appearance of a building or place but should also encompass how buildings and places function in use and over the lifetime of development....including how the design of a development can minimise energy and water usage and CO2 emissions'. "

Wind farms and renewable energy projects in general reduce CO2 emissions by their very nature as they displace polluting fossil fuel power plants. The preferred policy option on this issue seeks to rule out further areas for wind farm development by placing stricter limitations on developments in the Sperrins, conservation areas etc. There is no need for additional supplementary planning design guidance for the Sperrin AONB in conjunction with adjoining AONBs as the SPG is already in place.

### **Planning, Archaeology and the Built Heritage**

Q17 – Any further areas for designation as an ASAI?  
PPS 6 and the SPPS are working well in this respect.

	<p>Q18 – Areas within or adjoining settlements which are of great amenity value, landscape quality or local significance and therefore worthy of designation as an LLPA?          No – PPS 6 and the SPPS are working well in this respect.</p>
<p><b>RES</b></p>	<p><b><u>The Vision and Strategic Objectives</u></b></p> <p>RES agrees with the vision and strategic objectives. Particular comment is made in respect of the explanation of the vision in para 4.2 which sets out the Council's aspiration <i>to have an economy that will have been strengthened and grown through the embracing new technologies, encouraging investment in higher paying industries and improving our tourism base</i> in that RES are renewable energy and in particular wind energy can play a pertinent role in fulfilling this objective.</p> <p>RES encourages the Council to have regard to this wider benefit in consideration of proposals for renewable energy. The also reference the contribution that wind energy makes to the tourism industry.</p> <p>RES welcomes the promotion of good education. RES provides an accessible education resource for schools. Lough Hill and Lendrum's Bridge wind farms are used annually for school tours.</p> <p>RES welcomes the FODC position that any negative effects of climate change brought about by increased energy use will be minimised, with a greater reliance on renewable and low carbon sources.</p> <p>RES could encourage the council to make provision within the plan to facilitate adequate energy infrastructure, and in particular energy from renewable sources to meet the needs of the planning population growth.</p> <p>Plan policies should be framed to facilitate energy from renewable sources, to help Northern Ireland, and in particular FODC, reduce its use of key resources like energy and become less dependent on imports of oil and gas.</p> <p><b><u>Strategic Objectives</u></b></p> <p>Social - Renewable sector is a catalyst for investment and jobs, which will aid the provision of vibrant communities. RES encourage the Council to have regard to the role that renewable energy can play in sustaining our communities and ensure that plan policies provide onshore sufficient opportunities for wind and other renewables.</p>

Economic - RES encourages the Council to have regard to the key role the renewable industry can play in meeting the Council's strategic objectives of facilitating the creation of 4,875 new jobs by 2030 and promoting diversity in the range of jobs in the district. Onshore wind development makes a substantial contribution to the local economy in terms of job creation, sustaining employment and financial contributions. RES welcomes the FODC commitment to accommodate investment in public utilities infrastructure, and waste management.

**Environmental**

In general terms RES welcome the environmental objectives and set out the role of the renewable energy sector in addressing and mitigating climate change. RES welcomes FODCs commitment to making climate change and sustainability one of its key strategic objectives.

Whilst RES strongly welcomes the header text within the 'Environment' strategic objective, that cites promotion of climate change, RES are concerned that the amplification has been framed in a limiting way. Greater weight is being applied to protection of physical and visual existence of existing resources, with less emphasis being placed on actually promoting proactive development to tackle climate change –provision ought to be made for this in the language used in the plan, to encourage beneficial forms of development such as wind farms and other types of renewable energy, and thereby enable certain development to take place over the limitation on certain resources.

**Renewable Energy**

RES welcomes that Renewable Energy is recognised as a main issue in the Preferred Options Paper.

The renewable energy sector has a vital role to play in respect of the plans strategic objectives. RES have significant concerns with the baseline information cited in the POP as influencing the initial draft policy options and the supposition that extant targets have been met. The LDP is intended to provide overarching planning policy to at least 2030; it is therefore wholly insufficient to develop policies for the duration of the plan period based on these outdated targets (PFG 2011-2015 and SEF 2010-2020). RES would encourage the Council to adopt a more sustainable policy approach: To consider the current and projected energy usage and work towards a zero carbon approach.

The interim 2020 targets do not impose an upper limit, but rather place a minimum threshold that must be met by the member states to fulfil the UK's obligation to off-set the use of fossil fuels and work towards delivering the global climate change agenda. The LDP should be striving to exceed these minimum targets and promote a best practise model. RES would encourage the Council to proactively consider the relationship between their spatial growth strategy and energy consumption over the plan period.

The UK Energy Act, a legislative framework for delivering secure, affordable and low carbon energy and includes provisions on decarbonisation, electricity market reform, nuclear regulation and consumer protection. The act discusses the UK's obligation to increase the use of renewable sources and reduce carbon emissions and amalgamates the individual energy regulations of England, Scotland, Wales and Northern Ireland.

The PFG 2020 target of 20% of NI electricity from renewable sources being merely the first of a series of targets for energy generation. The base line fails to take account of the UK Climate Change targets for emission cuts, which seeks a 40% reduction in emissions by 2020, rising to 80% in 2015. RES would therefore encourage the Council to give broader consideration to the wider climate change agenda.

The Investment Strategy Northern Ireland 2011 highlights the importance of renewable sources in electricity generation.. The Council's attention is also drawn to The Onshore Renewable Energy Action Plan 2013-2020 plan. This recognises the significance onshore wind has in contributing to NI renewable energy resources. The action plan was intended to assist the outworking of the 2020 target. It is not an upper limit, but rather a starting point to work towards the aspirations of the Climate Change Act.

RES are particularly concerned that the Council are seeking to under plan for energy consumption throughout the plan period by simply relying upon the PFG 20% renewable energy target. RES would highlight that this approach conflicts with the Strategic Objective 3; to promote positive action on climate change in that it doesn't promote steps to actively tackle climate change.

They refer to previous decisions by the Planning Appeals Commission where the adjudicated on whether the 2020 target ought to be relied upon as a limiting threshold. The PAC found that the 40% target should be seen as "rolling targets and not ones to be capped upon achievement".

RES would encourage the Council to have regard to the approach taken by the ROI – see White paper (Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR)) which identifies reductions of 80% to 95% by 2050 and 100% reduction by 2100. Encourage the Council to consider a more ambitious target to reflect the anticipated strategic long term targets that are likely to be introduced in NI over the plan period.

#### **Current Renewable Provision**

RES would encourage the Council to fully reflect its strategic objectives by promoting a proactive approach to tackling climate change through encouraging renewable energy proposals to off-set fossil fuel use. The plan has a duty to provide flexibility to ensure on-going supply of renewable energy. A number of wind-farms in NI have now been operational since around 2000 and are coming to the end of their consented lifetime.

If decommissioning is not factored into planning policies it could result in a substantial deficit in supply in the plan period. RES recommends that the Fermanagh and Omagh LDP embrace the advantages of Re-powering renewable energy projects. FODC should consider a positive planning policy that supports the redevelopment and expansion of existing wind farm sites.

#### **Deliverability of Renewable Projects**

RES suggest that there is an inference in referencing the closure of the Northern Ireland Renewables Obligation that the plan does not need to provide for new development proposal. RES strongly urge the Council to ensure appropriate provision is made within the LDC for the proceeding 14 year plan period, notwithstanding the closure of the NIRO subsidy.

#### **Plan Policy Options**

RES are supportive of the current planning policy regime and what is set out within the SPPS, which are reflective of the SEF and RDS.

Council should reflect the aspirations of the SPPS in the LDP policies: To facilitate the siting of renewable energy generating facilities in appropriate locals within the built and natural environment in order to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance. RES would encourage FODC to reflect the criteria based approach to renewable energy generation contained within the SPPS in the LDP as it contains a robust assessment whilst allowing the flexibility for each application to be assessed individually whilst also taking potential cumulative impacts into account.

	<p>RES do not agree with either Option 1 or 2 for overarching policy as set out in the POP. They consider a spatial framework to be unnecessary (option 1), and do not consider there to be a need to introduce a stricter policy as the existing policy is sufficient.</p> <p>RES agree that portions of the district have experienced significant development pressure, particularly from the approval of single turbine development. RES believe that current policies within the SPPS and PPS18 provide ample protection of these areas but ensuring that sensitive landscape are protected and that a full and robust cumulative assessment is undertaken – the SPPS only permits development of wind farm sites in sensitive areas where the need outweigh the environmental impacts.</p> <p>RES highlight the obligation on FODC to produce a plan that is in general conformity to the Regional Development Strategy and to the SPPS. Programmes and policies underpinned by the rule of law provide greater certainty for investors, reducing risk and therefore the cost of capital which drives cost efficient investment for the benefit of industry and ultimately consumers. RES are firmly of the view that the most appropriate mechanism to achieve soundness is for the renewable energy policies to reflect the policies provided within the SPPS.</p>
<p><b>ESB Wind Development</b></p>	<p>The response was received by email after the deadline for the receipt of representations. The content of the submission reflects similar views to those from SSE Renewables in that they do not support the preferred options for renewable energy, that proper account has not been taken of the SPPS and a stricter policy for wind energy development in sensitive areas is not in keeping with the SPPS and the existing policy approach contained in PPS 18 should be retained. Reference is also made for the need to embrace the advantages of re-powering renewable energy projects.</p>

APPENDIX 3 Summary of Public Representations to Preferred Options Paper

Representation	Summary
<b>LDP0001</b>	Site specific representation. Request for inclusion of lands within the settlement limit for economic development use.
<b>LDP0002 – LDP0011, 0462</b>	<p>Concerned largely with renewable energy and the potential health effects of same. The authors query the financial return of existing schemes. Lack of broadband provision is also a concern. The absence of a dedicated Tourism officer within ‘the council areas lying within the Sperrins’ is queried.</p> <p>In terms of the Preferred Options Paper, the authors state the Built Heritage in the Omagh area was neglected citing Castle Place/ Square as an example.</p>
<b>LDP0012 – LDP0025inc. LDP0027, LDP0029, LDP0031, LDP0074 – LDP0078, LDP0771 - 0772</b>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The author also refers to the numerous ‘Mass Rocks’ in the area and the Battle of Formal in 965AD. The value of the Owenkillew and Owenreagh Rivers which are designated as SAC/ASSI in providing habitat for fresh water pearl mussels, otters, grey heron, salmon and brown trout.</p> <p>The author requests a management plan be put in place ‘to protect this sensitive, historic, archaeological landscape’. The author believes development ‘Doraville wind farm, industrial scale single turbines and the author Gold processing plant and the accompanying infrastructure such as pylons and sub-stations are totally inappropriate proposals for the Sperrins’.</p> <p>The author requests there should be supplementary planning guidance produced specifically for the Sperrins AONB in conjunction with adjoining ‘AONB’ Councils. The author also requests additional policy protection in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential be designated ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest.</p>
<b>LDP 0026, 0028, 0032 – 0035, 0087 – 0104, 0112 - 0113, 0117, 0124 – 0127, 0132, 0144</b>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The author also refers to the numerous ‘Mass Rocks’ in the area and the Battle of Formal in 965AD.</p> <p>A management plan should be put in place ‘to protect this sensitive, historic, archaeological landscape’. The author believes the development of ‘Doraville wind farm, industrial scale single turbines and the Dalradian Gold processing plant and the accompanying infrastructure – pylons and sub-station would change the integrity of the natural and cultural heritage of the Sperrins AONB forever’.</p> <p>The author requests proposals for certain industrialisation plans should be looked at individually (no specific mention of which). They recommend ‘on the ground consultation’ to attain a fuller picture of the impacts.</p>

	<p>PPS10: The author discusses the potential health impacts of telecommunication apparatus and cites a personal example of a development which has occurred near them.</p> <p>The author states that Broadband ‘needs to be addressed’ and complains parts of the Greencastle area still do not have a reliable land line service.</p> <p>The author quotes para 6.249 and 6.250 from the Strategic Planning Policy Statement (relating to Electro-magnetic fields from power lines) without going into specifics as to the nature of their concern here.</p> <p>The author requests there should be supplementary planning guidance produced specifically for the Sperrins AONB in conjunction with adjoining ‘AONB’ Councils. The author also requests additional policy protection in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential be designated ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest.</p> <p>The author concludes by requesting the townland of Crock be designated as an ASAI.</p>
<p><b>LDP0030</b></p>	<p>Disagrees with The <b><u>Vision and Strategic Objectives</u></b>, listing reasons why.  Agrees or largely agrees with the settlement hierarchy and spatial growth options.  The author disagrees with the preferred option for allocation of housing and economic land.</p> <p><b><u>Sustaining Rural Communities</u></b> - disagrees with the Council’s preferred option, citing reasons why. A general comment was added regarding the Council’s preferred option for addressing deprivation/regeneration in urban areas.</p> <p><b>Agreed with Addressing Deprivation/Regeneration in the Rural Area.</b>  <b>Disagreed Minerals and– Overarching policy for Renewable Energy Development</b> preferred options, citing reasons.</p> <p>Generally agreed with the Council’s preferred approach to Overarching Tourism, and disagreed with Operational Tourism, citing reasons.</p> <p><b><u>Supporting Good Design and Placemaking</u></b> - though additional information was given.</p> <p><b><u>Carried Forward Policies</u></b> - FODC should identify further areas of Significant Archaeological Interest and Areas of Archaeological Potential. Supporting text would indicating that additional protection should be sought for ‘sacred archaeological monuments’.</p>

	<p>Indication given as to where the town centre should be.</p> <p>Any other comments – Halting sites, Radon, Minerals, Renewables, Water, importance of Owenkillew SAC, licensing of mineral extraction permits.</p>
LDP0036	<p><b>No specific mention of Preferred Options.</b></p> <p>The importance of the wildlife in the Sperrins AONB generally is mentioned. Removal of fish from Coneyglen burn by ‘the fisheries’ mentioned, importance of maintaining it for future generations.</p>
LDP0037	<p><b>No specific mention of Preferred Options.</b></p> <p>Mentions an £11m grant awarded to Mourne, Gullion &amp; Lecale rural development partnership and questions why nothing has been given to Sperrins AONB area. Lack of funding for self-catering accommodation and the proposed Doraville wind farm which is sited beside same.</p>
LDP0038	<p><b>No specific mention of Preferred Options.</b></p> <p>Concerned predominantly with the Sperrin AONB and the wildlife within same. Expresses concern that ‘the Sperrins’ is not mentioned as a destination in the Community Plan. Need for bus service to the area. The risks involved in considering Industrial scale operations were laid out (mostly relating to environmental and health grounds). Poor management of Tourism in The Sperrins by stakeholders involved. The importance of the Local Development Plan process.</p>
LDP0039	<p><b>No specific reference to Preferred Options as presented.</b></p> <p>Concern in relation to potential pollution from the Gold Mine and the effects of wind turbines on animals. Reference to visit to being in proximity to a wind farm and states their ears were ‘ringy and sore in the inside’. Does not want people to move away because of industrialisation. Miss the stars at night and seeing the hares, bunnies, foxes and squirrels.</p>
LDP0040	<p><b>No specific mention to Preferred Options as presented.</b></p> <p>Concern in relation to wildlife, the Goldmine and wind turbines potentially making him sick.</p>
LDP0041	<p><b>No specific mention to Preferred Options as presented..</b></p> <p>Concerns relate to the Sperrins AONB and the effect wind turbines and gold mining will have on it. Consideration should be given to the effects that would take place if this goes ahead. Does not want to see her area ‘destroyed’.</p>
LDP0065 - LDP0072	<p>Concerned predominantly with the Sperrin AONB. Risk of industrial scale operations were set out. Poor management of Tourism in The Sperrins by stakeholders.</p>
LDP0073	<p>Site specific representation for the inclusion of lands within a settlement limit.</p>

<p><b>LDP 0079 - 0081, 0178, 0205 - 0206, 0208, 0210 – 0211, 0214 – 0215, 0217, 0220 – 0229, 0231 – 0233, 0236 -0237, 0240 – 0247, 0250, 0252 – 0255, 0260 – 0277, 0280 – 0283, 0342, 0556 – 0765, 0769 – 0770, 0773 – 0780, 0784 - 0798</b></p>	<p>There are two types of representation letter received, with the same wording Disagrees with the Council’s preferred option for addressing minerals development. There should be a presumption of a total prohibition on Fracking in the FODC area as Fermanagh Council unanimously resolved on the 30<sup>th</sup> July 2014. The representation includes a suggested policy wording:  <i>“The local development plan includes the presumption against unconventional hydrocarbon exploitation in line with the Strategic Planning Policy Statement, Fermanagh and Omagh District Council will oppose the granting of petroleum exploration licences over target strata described as shales, mud-stones, coal seams and ‘tight’ sandstone formations. There will be a presumption against planning applications associated with the exploration and/or development of petroleum resources situated in shales, mud-stones, tight sandstone formations and coal seams.”</i>  In favour of all Council initiatives to safe guard community assets, the support of community empowerment especially in regard to development of community owned renewable energy to create sustainable jobs, profit and energy for the community.</p>
<p><b>LDP0082</b></p>	<p>Provides history of Sperrin AONB, the Environmentally Sensitive Area (ESA), the Owenreagh, Owenkillev and Black Bog ASSI, the Lough Lark ASSI, the local Area of Significant Archaeological Interest and the range of archaeological remains in the area and their significance. Reference is made to tourism in the Sperrin’s, scenery, archaeology and road network. References Dispersed Rural Communities, welcoming the policy provision of CTY 10 of PPS 21 and recommending same be broadened to include development at crossroads. Recommends that ‘there should be supplementary planning design guidance produced specifically for the Sperrins AONB in conjunction with adjoining ‘AONB’ councils.’ There is a need for ASAI’s and AAP to be linked to the existing Beaghmore ASAI. Request that all ‘significant archaeology’ in the Broughderg Area is designated as a single ASAI. Detail of a previous request for extension of existing ASAI, dated 2006 was included.</p>
<p><b>LDP 0083</b></p>	<p>Provides some general comments on legislative and policy matters. Specifically refers to the SPPS and related town centre policy and the matters which the LDP needs to take into account when preparing the plan, including working collaboratively with other relevant stakeholders. Consider themselves to be a stakeholder and would welcome the opportunity to work collaboratively with the Council during the plan process.</p> <p><b><u>Comments on Vision and Objectives</u></b>  The vision is underwhelming given Omagh’s isolated position and need to be self-sufficient. The inability to cluster with other towns restricts consumer choice in the area and the plans future role should be to sustainably facilitate increased choice. Objectives for the economy should set a minimum target for facilitating new retail floorspace in the town.</p> <p>Evidence Base - In relation to the requirements to carry out a retail capacity study as part of plan preparation, emphasises the need to appoint experts in the field of retail capacity assessments etc, and on behalf of their clients would reserve the right to comment on such a study, as stakeholders.</p>

	<p>In terms of their site - which is inside the town centre boundary – they consider this is a commitment for a superstore and should be taken into account when undertaking the capacity analysis and designated as a site suitable for retail development in the LDP.</p> <p><i>Thresholds for Retail Impact Assessment</i> This is an issue to be 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.</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> A Primary Retail Core should at least be in the area covered by Market Street and High Street, but should be sufficiently wide to accommodate additional retail. Too narrow a PRC would pose difficulties to accommodate retail development, should the need arise. The PRC should incorporate their client’s site as indicated in their Appendix 1 map (this is the site of the former Scotts Mill, Mountjoy Road)</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><b>LDP0105</b></p>	<p>Site specific representation for the inclusion of lands within a settlement.</p>
<p><b>LDP0106 – 0111 inc, 0123, 0128, 0130, 0141, LDP0137, LDP0172</b></p>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The importance of the Owenkillev SAC/ASSI to the endangered fresh water pearl mussel is referenced.</p> <p>A management plan be put in place ‘to protect and promote this sensitive, historic and archaeological landscape’. The development of the ‘Doraville wind farm, industrial scale single turbines, the Dalradian Gold processing plant and the accompanying infrastructure such as pylons and sub-stations are totally inappropriate proposals for the Sperrins’.</p> <p>There should be supplementary planning guidance produced specifically for the Sperrins AONB in conjunction with adjoining ‘AONB’ Councils. Additional policy protection should be taken forward in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential be designated ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest.</p>

**LDP0114**

Entirely opposed to all stages of fracking baseline studies, exploration and exploitation. Propose the following wording is inserted into the Final LDP:

*The local development plan will reflect the presumption against unconventional hydrocarbon exploitation in line with the SPPS. Fermanagh and Omagh District Council will oppose the granting of petroleum exploration licenses over target strata described as shales, mud-stone, coal seams and 'tight' sandstone formations. There will be a presumption against planning applications associated with the exploration and or development of petroleum resources situated in shales, mud-stones tight sands and coal seams.*

Vision, proposed wording:

*Biodiversity, human and animal health and our important landscapes will be protected from inappropriate development such as unconventional hydrocarbon exploration and extraction. Sufficient open space and indoor and outdoor recreation facilities will be provided. By improved energy efficiency measures and a greater use of renewable energy sources, significant reductions in greenhouse gas emissions will be achieved along with improved wellbeing and a reduction in fuel poverty.*

Social (objective)

*To provide for environments that are safe, healthy and accessible to all and enhance opportunities for shared space.*

Economic Objective

*(iii) To promote diversity in the range of jobs recognising the importance of employment in all appropriate sectors, including new and emerging sectors where these are genuinely sustainable.*

*(iv) to recognise and accommodate sustainable entrepreneurship and innovation.*

*(ix) to protect the area's core business sectors, the health and wellbeing of its people and environment, by prohibiting, in accordance with the precautionary principle, unconventional hydrocarbon exploration and extraction in the area.*

Overarching principles

*Adoption of the precautionary principle in respect of development proposals where significant environmental, including health, implications are involved.*

Mineral Development - Suggest that Option 2 for Mineral development should be amended as follows:

*As for Option one, but additionally introduce a time limit for prospecting/exploratory works and to protect the Sperrin AONB, the UNESCO Marble Arch Caves Global Geopark, Areas of Nature Conservation, Areas of (Significant) Archaeological Interest and Areas of High Scenic Value from Minerals Development.*

The LDP needs to ensure that its own vision and strategic objectives are upheld – requires strong and consistent limits upon mineral development, including a total ban on unconventional hydrocarbon exploration and extraction.

	<p>Support community empowerment especially in regard to development of community owned renewable energy to create sustainable jobs, profit and energy for our community. Community energy revitalises communities. Reference to the following links as part of submitted evidence: <a href="http://www.nogaslamp.com/solutions">http://www.nogaslamp.com/solutions</a> <a href="http://newatlas.com/ecotricity-british-gas-grass/46531">http://newatlas.com/ecotricity-british-gas-grass/46531</a> <a href="http://concernedhealthyny.org/compendium/">http://concernedhealthyny.org/compendium/</a> <a href="http://www.nogaslamp.com/about1-c18ff">http://www.nogaslamp.com/about1-c18ff</a></p> <p>It is insufficient justification to use the presumption against fracking in the SPPS, given all other active pressures for fracking and there is no protection regarding the first stage of fracking in SPPS, the exploration stage. The Royal Society and Royal Academy of Engineers and the Public Health England will say there their reports are robust evidence. Reiterate a number of times the need for the LDP to bring forward a presumption against exploration for unconventional hydrocarbon. They consider that this should also include baseline studies. To not do so would allow the industry to get a foothold in the area. They assert that the Council is bowing to the corporate bullying of an aggressive company and reference Tamboran’s legal proceedings and a fear that the council could also be judicially reviewed. Questions if the Council have conducted an equality impact assessment of the decision not to protect us from all stages of fracking. We require an answer to our questions rather than questions to Council being ignored. Reference reports which detail social impacts of fracking on communities. <a href="http://icrt.org.uk/messages-from-research/">http://icrt.org.uk/messages-from-research/</a> and <a href="https://www.foodandwaterwatch.org/sites/default/files/Social%20Costs%20Fracking%20Report%20Sept%202013_0.pdf">https://www.foodandwaterwatch.org/sites/default/files/Social%20Costs%20Fracking%20Report%20Sept%202013_0.pdf</a> Relying on the LDP to safeguard the community wellbeing, health, clean air, clean water and clean land. Request details of complaints procedures and independent authority which may investigate out complaint about the formation of the community plan and LDP – they are supposed to reflect what the community says. They have been told that they cannot have any mention of fracking within the community plan in case the fracking company sues the council. As a Council you could not manage this industry in our community.</p> <p>Suggest Mullaghduin as a small settlement alongside Letterbreen.</p>
<p><b>LDP0115 -116, LDP0138 -0140</b></p>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The importance of the Owenkillow SAC/ASSI to the endangered fresh water pearl mussel ‘in the Ireland’ is also recognised.</p> <p>The extensive range of archaeological monuments in the Sperrins is acknowledged e.g. Dun Ruadh fort, and the Ogham Stone in Aghascribba and the Beaghmore Stone Circles. The numerous mass rocks in the area have been mentioned along with the ancient ‘Green Road’ through the Sperrins.</p>

	<p>A management plan should be put in place ‘to protect this sensitive, historic and archaeological landscape’. The development ‘Doraville wind farm, industrial scale single turbines and the Dalradian Gold processing plant and the accompanying infrastructure such as pylons and sub-stations are totally inappropriate proposals for the Sperrins.</p> <p>Supplementary planning guidance produced specifically for the Sperrins AONB should be taken forward in conjunction with adjoining ‘AONB’ Councils. Additional policy protection in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential be taken forward ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest’.</p>
<p><b>LDP0118 – 0122, LDP0129, LDP0131, LDP0143, LDP0145 - 0146</b></p>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The importance of the Owenkillev SAC/ASSI to the endangered fresh water pearl mussel ‘in the Ireland’ is also recognised.</p> <p>The extensive range of archaeological monuments in the Sperrins is acknowledged e.g. Dun Ruadh fort, and the Ogham Stone in Aghascribba and the Beaghmore Stone Circles. The numerous mass rocks in the area have been mentioned along with the ancient ‘Green Road’ through the Sperrins.</p> <p>Refers to the numerous ‘Mass Rocks’ in the area and the Battle of Formal in 965AD.</p> <p>A management plan be put in place ‘to protect this sensitive, historic, archaeological landscape’. The development ‘Doraville wind farm, industrial scale single turbines and the Dalradian Gold processing plant and the accompanying infrastructure – pylons and sub-station would change the integrity of the natural and cultural heritage of the Sperrins AONB forever’.</p> <p>Supplementary planning guidance specifically for the Sperrins AONB should be agreed in conjunction with adjoining ‘AONB’ Councils. The author also requests additional policy protection in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential be designated ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest.</p>
<p><b>LDP0132 – LDP 0135</b></p>	<p>Refers mainly to the Sperrins AONB, Ogham Stone and Dun Ruadh Fort, giving a historical context for the area, outlining its beauty and requesting additional design policy be introduced as well as specific policy protection for Beaghmore. The author also refers to the numerous ‘Mass Rocks’ in the area and the Battle of Formal in 965AD.</p> <p>A management plan be put in place ‘to protect this sensitive, historic, archaeological landscape’. The development ‘Doraville wind farm, industrial scale single turbines and the Dalradian Gold processing plant and the accompanying infrastructure – pylons and sub-station would change the integrity of the natural and cultural heritage of the Sperrins AONB forever’.</p>

	<p>Proposals for certain industrialisation plans should be looked at individually (no specific mention of which). They recommend ‘on the ground consultation’ to attain a fuller picture of the impacts.</p> <p>Discusses the potential health impacts of telecommunication apparatus and cites a personal example of a development which has occurred near them. Broadband ‘needs to be addressed’ and complains parts of the Greencastle area still do not have a reliable land line service. Quotes para 6.249 and 6.250 from the Strategic Planning Policy Statement (relating to Electro-magnetic fields from power lines) without going into specifics as to the nature of their concern here.</p> <p>Supplementary planning guidance should be produced specifically for the Sperrins AONB in conjunction with adjoining ‘AONB’ Councils. Additional policy protection in the form of an Area of Special Archaeological Interest and an Area of Archaeological Potential should be designated ‘as an extension or part of the existing Beaghmore Area of Significant Archaeological Interest. Concludes by requesting the townland of Crock be designated as an ASAI.</p>
<p><b>LDP 0142</b></p>	<p><b><u>Housing Land Allocation.</u></b> This is a site specific representation for the inclusion of land within a settlement limit.</p>
<p><b>LDP0147 – LDP0171</b></p>	<p><b>Develop thriving rural and urban communities</b> Should be noted that our communities have been divided by the activities of wind farms and mineral extraction. The Council’s support for such industrialisation particularly in the AONB and ASSIs must cease.</p> <p><b>Wind Farms, turbines and associated infrastructure</b> Wind Farms, turbines and associated infrastructure impact on the visual aspects of a tourist orientated area, as well as perhaps more importantly, on the physical and mental wellbeing of the young and elderly which are well documented in medical journals and research papers. The effect of infrasound cannot be measured by the environmental health department of FODC, this needs to be addressed in policy formulation. Group can provide valid research documents in relation to physical &amp; mental wellbeing, sleep deprivation due to audible noise, sleep deprivation and associated effects like depression, diabetes, heart disease, high blood pressure etc., epilepsy or seizures associated with the flickers effect from wind turbine blades.</p> <p>The onus is on the Council to provide “a safe environment for all its citizens”. It should address the above issues and also make provision to prevent problems like ice and debris throw from turbines as well as providing adequate fire prevention measures to deal with turbine fires.</p> <p>The effect of Electro Magnetic Fields in the vicinity of electricity substations/pylons also requires examination. The argument that wind turbines are “Clean &amp; Green” is a fallacy as the carbon produced during manufacturing and erection would not in a hundred years of usage balance out. The Renewable Heat Incentive Scheme scandal currently under scrutiny is nothing compared to the can of worms opening with regard to the Wind Industry.</p>

	<p><b>Renewable Schemes</b> In relation to “renewable schemes” the Council should do research before spending the rate payers money.</p> <p><b>Tourism</b> Our area traditionally had a high dependency on tourism, yet our Council does not have an Officer in charge of those Council areas lying within the Sperrins.</p> <p><b>Connectivity</b> If our local economy is to thrive and expand connectivity needs to be improved. Many rural locations do not have high speed broadband e.g. Kiladroy Road, Beragh. Modern agricultural practice and rural businesses need high speed broadband to flourish. Social media is largely dependent on connectivity and it is vital that it is facilitated. Improved broadband can make a difference for the elderly living alone through remote observation via CCTV.</p> <p><b>Rural Road Networks</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><b>Built Heritage</b> Built Heritage in the Omagh is being neglected notably Castle Place/Jail Square, Ireland’s only known Bee Wall (on Council Property) and neglected ancient sites.</p>
<b>LDP 0173</b>	<p>Agrees with the Council’s preferred option for spatial growth.</p> <p>Agrees with preferred option 3 for allocation of housing but states that the HGI figures on which the allocations are based result in an under allocation of dwellings across the District. The resultant shortfall of 688 would mean additional land could be designated within the settlement limit of Dromore, within which the applicant has asked a site be included.</p>
<b>LDP 0174</b>	<p>Agrees with the Council’s preferred option for spatial growth.</p> <p>Agrees with preferred option 3 for allocation of housing but states that the HGI figures on which the allocations are based result in an under allocation of dwellings across the District. The resultant shortfall of 688 would mean additional land could be designated within the settlement limit of Enniskillen, within which the applicant has asked a site be included.</p>
<b>LDP 0176</b>	<p>Request for the settlement limit of Fivemiletown be extended as far as the Golf Course, to allow for relaxation of restricted route policy.</p>
<b>LDP 0177</b>	<p><b>Development in the Countryside; Sustaining Rural Communities.</b> Supports the Council’s preference to sustain rural communities within FODC. The future proposal at Curraghinalt will significantly expand on the current level of employment and programmes will be put in place to ensure that local people are well placed to have access to employment opportunities, to the maximum permissible extent.</p>

The proposed policy for housing development in the countryside should ensure that such development would not prejudice the delivery of minerals development and the need to continue to safeguard these resources should be reflected in any proposed policy.

Inappropriate surface development within an area of known resource could sterilise a multi-million pound investment, as the resource can only be mined where it is found.

Proposed Special Countryside Areas should have regard to the existing designations and in particular to the extent of the AONB designation. FODC should carefully consider whether any further controls are required within the AONB.

The landscape capacity assessment and development pressure carried out by FODC is not a reliable evidence base.

**Economic Development – Addressing Deprivation/Regeneration in the Rural Area.**

Agrees with the Council's preferred option for addressing deprivation/regeneration in rural areas. Currently employs 42 people of which 25% were previously from agricultural backgrounds. Currently supports 42 direct jobs, of mixed Co skills. Detail of local employment, education and training provisions are provided.

**Mineral Development**

Opposes the Council's preferred option for addressing mineral development. The Council should obtain whatever evidence it requires from the Department of Infrastructure, or GSNI, to ensure that the emerging Plan does not contradict the established approach to safeguarding this resource, and the opportunity it represents. It should also revisit its evidence base on landscape to ensure that its proposed approach to constraint is both informed and proportionate. It should only move to designate areas of constraint once it has a clear and defensible view on both the opportunity which exists within its boundaries, and the areas where constraints are legitimately required.

There is a need to distinguish between the different parts of the minerals sector as underground mining for valuable minerals, and associated processing, raise an entirely different set of planning issues to quarrying for aggregates like the National Planning Policy in England which sets out a disaggregated approach is expected.

**Minerals Safeguard Areas** - The Council has failed to include evidence in respect of the Mineral Safeguard Areas fundamentally undermines the preparation of the policy and the identification by the Council of any preferred option. It is currently working in a vacuum and the public and other stakeholders are being invited to comment upon an inchoate position. Reminds FODC that the extraction of minerals is dependent upon the availability of sufficient land to provide for the processing and storage of materials and their distribution similar to the approach endorsed elsewhere in England through the Planning Practice Guidance. This approach ensures the operations to extract and distribute minerals can take place without impact on amenity. FODC's mineral policy needs to recognise this important factor.

The terminology used in Paragraph 8.2 that the thrust of regional policy is to balance, the need for mineral resources ‘against’ the need to protect and conserve the environment. The wording should be ‘with’ instead of ‘against’. There is no evidence provided in the POP or supporting position papers which demonstrates that minerals development has an adverse impact on the environment. Also environmental issues represent only one element of sustainable development and due weight should also be given to the social and economic elements of sustainable development.

Current exploration operations at Curraghinalt currently employs 42 people through direct employment. It is proposed that the proposed mineral extraction at Curraghinalt could also generate 350 jobs and generate a significant GVA annually. Also the proposed development could support c.300 construction jobs during the 15-25 month construction period and would also support a significant number of indirect and induced jobs. The significant investment proposed operations will develop new skills to be exploited, new equipment requirements and would set FODC apart from other Council areas in terms of the mining specialism.

It is important to ensure that resources are not unduly constrained and, appropriate safeguarding is put in place. Supports FODC’s proposal to carry forward Policy MIN5 of the PSRNI.

Option 3 is unduly prohibitive on the minerals industry, and does not take account of the significant economic contribution that the sector makes towards the local economy, regional and national economy, and its importance for other sectors, including the construction industry,

None of the options presented in the POP consider the economic impact that would result from the loss of future investment in the sector as a result of constraint on mineral development.

#### **Areas of Constraint on Minerals**

It is important that each mineral is considered separately in terms of the requirements for extraction and the contribution to the economy. Precious metals should be considered separately to the construction related extractive industries. The extraction of precious metals, such as gold, is very distinct and therefore merits its own consideration. The Curraghinalt Project in particular would be of substantial benefit to the Northern Ireland.

“Case-law” is cited in relation to Magherafelt Area Plan 2015 in relation to the identification of ACMD were the Commissioner concluded that “Such an approach does not suggest that adequate consideration has been given to balancing economic and environmental considerations”. A similar exercise to that suggested for the environmental designations needs to be carried out in respect of the AONB, clearly setting out these areas most vulnerable to minerals development and limiting areas of constraint to those parts of the AONB where the protection afforded by MIN2 and Des4 is considered insufficient.” A detailed assessment of the key characteristics and sites within the AONB should have been carried out to justify the extent of the proposed ACMC.

The **Landscape Character Assessment** carried out by FODC for Position Paper 5 (Environmental Assets), 14 (Landscape Character Assessment) and 15 (Development Pressure Analysis) has been reviewed. Position Paper 14 concluded that their site at Curraghinalt falls within the LCA24 as defined in the NICLA 2000, with a low capacity to absorb new development. However their review concludes that the Landscape Character Assessment does not constitute evidence for a reliable assessment of landscape sensitivity and has no evidential base.

**Introduction of a time limit for prospecting/exploratory works – to 15 years** - The imposition of a time restriction on mineral development is inappropriate as it would unduly restrict potential investors, particularly where the quantum of mineral resource dictates that more than 15 years would be required for the construction, extraction and restoration phases.

There is no evidence within the POP or the supporting information to justify why a 15 year timeframe is required. They have appointed a full environmental consultant team to assess all stages of development which are estimated to last for 27 years from construction through to restoration. The introduction of an arbitrary blanket time limit with no evidential base is misconceived and an inappropriate constraint on sustainable minerals development.

#### **Integrated Renewable Energy & Passive Solar Design**

Supports the Council's preferred option for addressing Integrated Renewable Energy and Passive Solar Design in new Development on the basis that it will allow all new development to reduce carbon emission and make a positive contribution to climate change mitigation however it should be recognised that not all new buildings are suitable for the deployment of certain types of renewable energy technologies and as such there may be valid commercial and technical constraints to the deployment of these technologies which will warrant flexibility with the application of the policy e.g. conservation or heritage constraints.

Policy should adopt a hierarchical approach in that it should prioritise the use of passive solar design and other 'fabric first' efficiency measures as such options are the most sustainable and cost effective to reduce carbon emissions.

In relation to the proposed wording of policy there should be flexibility to recognise the different types of buildings, the different commercial and technical factors that may apply.

Support the use of the 1000m<sup>2</sup> threshold however suggest that to ensure that the policy is sound that wording such as "subject to commercial and technical viability to allow for flexibility with the application of the policy".

#### **Supporting Good Design and Place Making.**

The author support the Council's preferred option for supporting good design and place making.

Supplementary planning design guidance should NOT be produced specifically for the Sperrins AONB in conjunction with adjoining 'AONB' Councils.

	Any development proposals of any nature within an AONB are subject to more scrutiny than in other areas due to their landscape and environmental quality. Any development proposals to listed buildings and scheduled monuments, and on the character of area recognised for their landscape or townscape value, such as Areas of Outstanding Natural, Conservation Areas, Areas of Townscape Character and Areas of Village Character. (Article 6(3) of the General Development Procedure Order (2016)) should be accompanied by an assessment of what impact the development will have on the asset.
<b>LDP0179</b>	Largely supportive of the Preferred Options Paper but stresses the importance of identity, in particular seeking the inclusion of Killyclogher as a village.
<b>LDP0180</b>	Query the HGI figures, believing a longer average period would give a larger housing allocation figure for the area and be more representative of the totality of development over the past 15 years. Also includes a site specific reference.
<b>LDP 0181</b>	<p><b>Specific comments and points of clarification (quoting relevant paragraph reference of POP):</b></p> <p>2.11 – query the timing of the Urban Capacity Study and as concerned it will not be available to inform the LDP.</p> <p>2.19 – raises a concern that the Habitat Regulations Assessment is yet to be produced and as it is considered that this is required to establish the key sensitivities of the various protected sites. This would allow for effective avoidance techniques as opposed to mitigation measures.</p> <p>2.29 – considers that waste water treatment is a fairly significant constraint and seeks further clarification on the timing of capacity improvements in Clabby. A co-ordinated approach should be adopted relation to identifying development, and it should be ascertained if there are any environment issues associated with existing or upgraded plant.</p> <p>4.2 – does not agree that the Vision for the Community Plan and LDP should be the same, but instead the Community Plan vision “can flow to and inform” the LDP vision. Considers the Vision vague and not specific to Fermanagh and Omagh District Council Area, which is exceptional in its richness of wildlife and diversity of habitat types.</p> <p>4.7 – requests evidence underpinning these overarching principles is referred to and made available.</p> <p>4.10 – Needs to be a stronger expression of sustainable development within the overarching principles. There should be reference to steering development to less sensitive locations. The overarching principle related to biodiversity should be strengthen in line with Article 1 of the Wildlife and Natural Environment Act (NI) 2011. Recommends a further overarching principle should seek the careful management, maintenance, and enhancement of ecosystem services.</p>

5.0 – should pursue a more co-ordinated multi-disciplinary approach to land use planning. Would therefore recommend reference to the document ‘Planning naturally – spatial planning with nature in mind: in the UK and beyond’ and the 12 principles of good spatial planning.

5.4 – there is a need to recognise that the natural heritage is one of Northern Ireland’s and FODCs greatest assets. Falls short of the SPPS requirement to bring forward a sustainable development in the countryside and places an over emphasis on growth. Wording should be amended to reflect Option 3.

5.18 – suggests a review and evidence-led approach of the previous allocations including a review of deliverability. Clarification on the meaning of ‘best employment sites’ is sought. Again highlights the need to steer development away from sensitive areas and areas of biodiversity.

**Responses to Consultation Questions:**

Q1 – considers that the inter-relationship of the three pillars of sustainability needs to be greater and given the current format of the objectives. Considers that the objectives do not go far enough in terms of climate change mitigation and adaption (only references to meeting Climate Change targets). Considers that there should be a further objective to steer development to less environmentally sensitive areas (including habitats and species).

Q3 – Agrees with spatial growth strategy providing it steers development away from sensitive areas, and this should include non-designated sites outside the protected site network and as these can make a valuable contribution to biodiversity (and as only a small proportion of biodiversity is protected in designated areas).

Q4 – 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.

Q5 – Do not agree with the preferred option as it could still result in substantial development away from the two hubs and without factoring in the capacity of the environment to accommodate growth.

Q6 – Considers that the options fail to relate the protected interest features to the policy options and this should be addressed. Map 8 does not go far enough and needs to breakdown designations to follow the approach in PPS2. Provides a suggested level of designation from the SPPS and notes RSPB can provide details on important sites outside designated areas. Notes that all development should be within ‘environmental limits’ and this should be a plan-led approach as this is tested via a SEA. Notes that a RAMSAR is not a European designation but an ‘International’ designation.

Q7 – notes that ‘States of Nature 2016’ reports highlights urban biodiversity is declining and therefore should be protected and enhanced to include via layout and design and connections. Refers to ‘The Wildlife Trusts – planning for healthy environment good practice good practice guidance for green infrastructure and biodiversity’ and key measures that could be incorporated into design and layout.

Q9 / 9b – Reference should be made in policy to sustainable local supplies which include the use of recycled materials. Recognises that mineral sites have the potential to enhance biodiversity through restoration and therefore policy should require high quality restoration (with particular reference to the ‘RSPBs Habitat Creation for the Minerals Industry’ document). Promotes that planning permission should not be granted for peat extraction from new or extended sites, or renew extant permissions given it is non-renewable and results in the depletion of a carbon store and impacts on biodiversity.

Q10 – recommends a combination of option 1 & 2. Areas considered sensitive should have their nature designations listed, and notes that it is likely that other areas will come forward during the plan period. Spatial policy should identify suitable sites for the delivery of renewable energy. Acknowledges the contribution this can make to climate change. Further prominence should be given to ecological impacts from wind energy development.

Q11 / 11b – policy should be more ambitious aiming for zero carbon developments.

Q12 / 13 / 13b – species, habitats, landscapes and green spaces form a network of visitor attractions, however human activity can sometimes have a negative impact on biodiversity and therefore policy should ensure that proposal do not have an adverse impact. This includes impact from recreational tourism to key birds particularly areas of wet grassland. Therefore tourism development should be steered away from sensitive areas.

Q16 / Q16b – fails to refer to key design features of biodiversity. Good design needs to refer to areas around the building.

**Response to Retained Policies:**

Development in the Countryside – in identifying Areas of Constraint should reference natural environment.

Natural Heritage – policy should not be altered to weaken provisions made in PPS2. Potential zoning should have regard to natural heritage. Policy should include reference to restoration and enhancement of natural heritage.

Open Space, Sport and Recreation – refers to RSPB publication ‘Wellbeing through Wildlife’. There should be reference to multi-function green space and quality of space.

Renewable Energy – refer to submission to DoEs Call for Evidence.

	<p>Telecommunications and other utilities – reference should be made to the sensitive sites which include species and habitats. Power lines can pose risks to certain birds.</p> <p>Town Centre and Retailing – para 12.47 fails to recognise how enhancements to the natural environment can contribute towards an attractive and flourishing town centre.</p> <p><b>Supplementary Comments</b>  <b>[NB: these comments below arrived on 30/11 after consultation closed]</b></p> <p>Q10 – Recommends a number of further areas for inclusion as sensitive to wind energy development [<b>in bold</b>]:</p> <ul style="list-style-type: none"> <li>- Cuilcagh Mountain <b>SAC</b></li> <li>- <b>Pettigo Plateau SCA/SPA</b></li> <li>- <b>West Fermanagh Scarplands SAC</b></li> <li>- <b>Swanlinbar River Valley</b></li> <li>- <b>Sillees River Valley</b></li> <li>- <b>Arney River</b></li> <li>- <b>Garvary River near Castle Caldwell</b></li> <li>- <b>Ross Lough and Carren Lough on the Sillees River</b></li> </ul> <p>Q13 – Preferred locations most likely around the known hubs of Enniskillen, Lisnakea, Irvinestown, Belleek, Kesh, Belcoo, Derrygonnelly, Castle Archdale Country Park, and Share Centre</p> <p>Q13 b) – the Fermanagh Area Plan 2007 presumption to restrict development on islands in both Lower and Upper Lough Erne, Lough Macnean, and Lough Melvin.</p> <p>Q14 c) – visitor hubs would be appropriate to access waterways which are robust and could cope with additional development including Enniskillen, Muckross, Lough Macnean, and Lough Melvin. Consideration should be given to avoiding certain locations for ‘visitor hubs’ including designated areas or, for example, where there are wetland habitats for breeding waders (due to disturbance).</p> <p>Q15 – Suggests the same as for Q10 above.</p>
<b>LDP 0182</b>	<p>Requests that FODC give consideration to a “special project” tourist project such as an Eco-village. Cites other examples in Wales which the Welsh government has funded, in the hope a similar scheme may take place here.</p>

<p><b>LDP 0183, 0802</b></p>	<p>Saving Necarne – submission on behalf of Saving Necarne, community from local and surrounding region in Fermanagh and Tyrone. (2 individual responses)  Priority 1 – Meeting Regional Community Health, Wellbeing and Disability Needs in Necarne. (Plan to improve health and wellbeing for people with a disability in NI through participation in sport and active recreation. To be delivered in partnership including councils)  Priority 2 – Village Plans- need to abandon any thoughts of privatising Necarne as it is contrary to the village plan which was endorsed by the Council.  Priority 3 – Heritage  Built heritage at risk report (<a href="https://savingnecarne.wordpress.com/castle-at-critical-risk/">https://savingnecarne.wordpress.com/castle-at-critical-risk/</a>)  Community ownership of Necarne as being important is highlighted in the above report.  Priority 4 – Community Context in which Necarne Exists  Potential for Necarne to be a centre not just for health and wellbeing but a centre for healing, education, peace and reconciliation.  Effects of PTSD in NI. Suicide and depression rates so high.  Priority 5 – Necarne at the centre of Fermanagh Omagh Council area and central to community empowerment, wellbeing and health solutions.</p>
<p><b>LDP 0184, 0186-188, 0192 – 0196, 0198</b></p>	<p>Opposed to fracking and has included a proposed wording which should cite the Council's opposition to same.</p>
<p><b>LDP 0185</b></p>	<p>The author raises concern that Boho is not identified in the proposed settlement hierarchy.</p> <p>Issues raised outside the remit of the LDP process.</p> <p>PPS 21 – Sustainable Development in the Countryside and the requirement under CTY 10 (Dwellings on Farms) to integrate beside a principle group of buildings on the farm).  Planning and Economy: employment opportunities should not only be allowed but encouraged and farm diversification should be encouraged.</p> <p><b>Renewable Energy:</b> Strongly opposed to any further wind turbine development.  Telecommunications: Poor internet speed and the lack of mobile phone coverage were cited as potential impediments to 'modern day living' and 'the promotion of any form of development'.</p> <p><b>Town/Village centre regeneration:</b> proposes a rates reduction for parts of village/town centres to increase occupancy rates.</p>

	Other issues inc. the quality of the roads infrastructure.
<b>LDP 0189, 282, 819</b>	<p>Applauds and welcomes 'ambitious and wide ranging' Area Plan. Expresses concern at the absence of 'an explicit indication of the intention of the District to prohibit the exploration and extraction of petroleum from shale rock, tight sands and coal seams onshore'. They express concern that neither the word fracking nor the phrase hydraulic fracturing is mentioned - the POP is not explicit enough in its opposition to fracking and includes suggested wording for new policy.</p> <p>The deleterious impacts of fracking on air, water, soil – and therefore human and animal health and the environment – cannot be limited by any regulation to specific tables and length of time.'</p> <p>Refers to South West Pennsylvania Environmental Health Project, an organisation in South West Pennsylvania which helps people who believe their health has been or could be affected by fracking.</p>
<b>LDP 0190</b>	Opposed to fracking and has indicated he has included a suggested wording for the final LDP. However the remainder of his correspondence is blank.
<b>LDP 0191</b>	<p>Opposed 'Fracking' due to impact on local food producers. Suggests wording to insert in LDP to presume against 'unconventional hydrocarbon exploitation'.</p> <p>In favour of initiatives to safeguard community assets and community empowerment with regard to community owned renewable energy.</p>
<b>LDP 0197</b>	<p>Agreed with the Vision and Strategic Objectives and the Preferred option for Spatial Growth Strategy.</p> <p>Disagrees with Economic Development Land Allocation – allocation of economic development land Addressing Deprivation/Regeneration in the Urban Areas, specifically they disagree with the emphasis on land adjacent to the proposed A5 stating Choice of location for future investors should be informed by a more diverse array of factors and not strategic access alone.</p>
<b>LDP 0199</b>	No less than a total ban on this destructive process. Save our lakes.
<b>LDP 0200</b>	Proposed 'a ban on fracking of all forms in the plan.' No further information is given.
<b>LDP 0201</b>	Ban unconventional gas exploration and extraction (fracking) due to the well documented impacts on human health and the environmental.
<b>LDP 0202</b>	<p><b>Opportunity sites in Omagh</b></p> <p>There are a number of site specific suggestions made. Consideration should be given to relaxing Protected Routes Policy. Considers housing limits should not be reduced, providing flexibility for land owners and potential developers. Boundaries of towns and villages should be extended to offer a choice of locations. Cites NI Water policy changes re: privately installed sewage treatment plants as example that areas which previously could not be developed have potential to be.</p>

	<p>Argues that any reference to EU legislation should be removed as the final plan could be challenged in court due to 'Brexit' result. Consideration should be given to identify areas to provide industrial estates and enterprise centres in smaller towns. Reduced rates or no rates should be introduced to facilitate investment and job creation.</p> <p>LDP should provide serviced sites to facilitate world leaders in the manufacture of quarrying equipment and spin off companies. The LDP should recognise the importance of the local skills base and introduce policies in conjunction with SWC and the two local universities to enhance this important sector.</p> <p>Disagrees with introduction renewable sources linked to new housing.</p>
<b>LDP 0203</b>	<p>A management plan be put in place to protect the 'historical archaeological landscape' which is the Sperrins. Outlines their opposition to the industrialisation being proposed citing Doraville wind farm and Gold Mine.</p> <p>Supplementary planning guidance should be provided for the AONB. The townland of Binefreaghan should be designated as an ASAI.</p>
<b>LDP 0204</b>	<p>Requests a total ban on fracking in the area and suggests 3no changes to the final LDP: the proposed definition on short term be reduced from 15 to 5 years; The whole of the FODC area should become an ACMD; The section dealing with Fracking is not explicit enough in its opposition to fracking. FODC should have a presumption of a total prohibition on fracking in the FODC area.</p>
<b>LDP 0207</b>	<p>Agrees with the Spatial Growth Strategy as laid out.</p> <p><b>Economic Development:</b> Agrees delivery of sites should be reviewed and a more considered approach adapted to realising new economic development. They consider there is a clear requirement for IT/Service based roles.</p> <p><b>Infrastructure:</b> Seek further investment and improvement in the road network in the District and welcome the opportunity to encourage other active and sustainable modes of transport.</p>
<b>LDP 0209</b>	<p>On behalf of the eleven communities designated under the Fermanagh Area Plan as Dispersed Rural Communities.</p> <p>These communities are concerned that without any pre-consultation with the members of these communities that the Dispersed Rural Communities designation is being withdrawn, resulting in these areas being classed the same as open countryside. Representatives have examined the Settlement Appraisal document and contend that they (the DRCs) 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 hierarchy.</p>

	DRC representatives seek reassurance that all settlements across FODC have received equal consideration when decisions were being made on whether or not they would be included in the Proposed Settlement Hierarchy. Tables as per Settlement Appraisal paper have been completed for a number of the DRCs for consideration as small settlements.
<b>LDP 0212</b>	<p>Consider that the on-shore wind energy policy proposed, to limit development in sensitive areas, is a disabling policy approach inconsistent with national policy and the evidence base that informs the POP. Would encourage the Council's policies to reflect the criteria based approach to renewable energy as per SPPS and PPS18.</p> <p>Should reflect the 40% national target for all electricity consumed to be generated from renewable sources by 2020. Furthermore, suggests that any target should be 'rolling' and given that the LDP is a 15 year policy document.</p> <p>Consideration should be given the re-powering of renewable energy projects that are coming to an end of their consented lifetime, and this should be positively reflected in policy.</p>
<b>LDP 0213</b>	<p>Expressed opinion that they would like to see 'efforts to complete development' and cite Donagh village as an example. Retention of Dispersed Rural Communities to retain the rural population</p> <p>Possibility of Enterprise Zone designation to address 'empty/dilapidated/house unit in Newtownbutler and other villages.'</p>
<b>LDP 0216</b>	<p>Overall there is a concern regarding the loss of population from the area and the impact this can have on sustainability the rural community. Suggests a number of land-use needs for the area including:</p> <ul style="list-style-type: none"> <li>• Private house-building in Trillick and Kilskeery villages</li> <li>• Older peoples accommodation in Trillick</li> <li>• Recreation facilities and sports pitches in Trillick</li> <li>• A pitch, allotments, playpark and riverside walk in Kilsheery</li> <li>• Generally more people/new houses to support services and businesses</li> <li>• More opportunity for new houses in the countryside</li> <li>• Opportunities for small businesses in the countryside</li> <li>• Policy should not restrict potential for visitor accommodation (Main Issue 11)</li> <li>• Concern if Coa is no longer designated as a 'Dispersed Rural Community' not identified as a 'small settlement' as this may hinder efforts to sustain this rural community.</li> </ul>
<b>LDP0218</b>	Voicing concern to Mr Lynch (DFI Planning) regarding the proposed Dalradian Gold mine application and is seeking clarification on same.
<b>LDP 0219</b>	<p>Para4 – should read 'to support economic, environmental and social needs'. Para 2.5 – should read 'habitat rich and more intensive farmland'. P.25 – The importance of restricting development on floodplains is emphasised; FODC could be further capitalising on its natural landscape if Greenway Cycle Route could be created, citing example from Co.Mayo. The author queries the Opportunity Site Zoning in the existing area plan (TC17) Johnston Basis Opportunity Site.</p>

	Active consideration should be given to a 'One Planet Development Policy'. FODC should play a prominent role in championing local agri-environment programmes
<b>LDP 0230</b>	<p>Recommend a reference to the ICBAN Report, 'Fibre at a Crossroads' which was completed for FODC and other member Councils in the ICBAN partnership (a key aim of the report was to take digital fibre connections deeper into the distribution network within rural areas).</p> <p>Recommend passive infrastructure be incorporated into new footpaths/roads in order to facilitate future expansion/ connectivity.</p>
<b>LDP 0232</b>	<p>Background information provided on the quarrying industry in general and specific comments on the options relating to minerals development only. Preferred option is Option 3 but they would strongly argue against any policy that would introduce a prejudicial constraint on mineral development in AONBs, as this could sterilise a large area of countryside and remove a large proportion of NI's sand and gravel reserves. Adamantly opposes the introduction of ACMDs in the AONB and asks that further research is carried out before such areas are finalised.</p> <p>Strongly recommends that we obtain information on supply and demand from minerals operators as well as the reserves in order to help decide on ACMDs and areas of minerals safeguarding.</p>
<b>LDP 0234</b>	<p>The Vision and Strategic Objectives</p> <p>Do not agree with the Vision and Strategic Objectives:</p> <ul style="list-style-type: none"> <li>(i) The vision statement should incorporate 'that we acknowledge, value, celebrate and protect the tremendous resource of the wild, unspoilt and unpolluted natural beauty' of our Sperrins uplands.</li> <li>(ii) Should preserve natural environment as a key principle for strategic planning at every level. Merits greater priority within the proposed planning strategy for FODC.</li> <li>(iii) Term 'Sustainable' needs to be properly used and examined</li> <li>(iv) Impact of BREXIT discussed</li> <li>(v) Cannot forsake the geographical problems associated with where we are located</li> <li>(vi) Tourism is discussed and the need to enhance based on what we have to offer</li> <li>(vii) Need to recognise all elements of past culture</li> <li>(viii) Need to preserve our indigenous architecture.</li> </ul> <p>Settlement Hierarchy –There is a need for further designation of small settlements. Discusses settlement distribution and patterns.</p> <p><b><u>Spatial Growth Options</u></b></p> <p>Largely agrees, but not allowing projects that could negatively affect the environment.</p>

**Housing Allocation**

Do not agree with Preferred Option. The policy presumption in favour of centralisation needs to be interrogated and its impact on FODC.

**Economic Development Land Allocation**

Agreed, options considered in percentages but option 2 is less specific.

**Development in the Countryside; Sustaining Rural communities.**

Do not agree with the Preferred Option.

**Economic Development - Addressing Deprivation/Regeneration in the Urban Areas.**

Should consider community based responses to these answers

**Economic Development: Addressing Deprivation/Regeneration in the Rural Area.**

Agreed Yes

**Minerals Development**

Do not agreed, there is a need to differentiate between aggregate extraction, and precious mineral extraction and to further differentiate these from peat and water extraction. Extraction of precious minerals should not be allowed near AONB, ASSI, SAC or ACMD due to risks including: acid water, pollution of water, air and health. Specialist advice needs to be sought by planners in light of this. Option 3 lacks transparency. It lumps all mineral extraction together in a manner that is not fit for purpose. Extraction of gold etc. would seem to be acceptable exception.

Concerns that the wording of these paragraphs is too general, and that there are contradictions. Concerns expressed for the environment and the approach displayed in relation to the councils approach towards mineral resource areas.

**Overarching Policy for Renewable Energy Development.**

Do not agree, overdue need to change the policy on wind energy. The scale and level of development of wind energy in FODC is in a state of anarchy. Review of this is needed.

Overarching Tourism.

Agreed, writer offers numerous thoughts on tourism assets in the Sperrins.

Author makes comment on the wording of 'for tourism or recreation', stating that it should be removed as it is misleading.

Operational Tourism.

	<p>Does not agree. Discusses sustainability etc., in terms of tourism and review of initiatives.</p> <p>Supporting Good Design and Place Making. Talks about Sperrin locally agreed tourism branding. Detailed comments in relation to design and living locally. Discusses effects of development upon the AONB.</p> <p><b><u>Carried Forward Planning Policies</u></b> PPS 6 – Planning, Archaeology and the Built Heritage. Agreed that further areas should be identified as ASAI's. Important to undertake further work on this.</p> <p>Considers that there is need for the advice of experts in the designation of LLPAs.</p> <p>Town Centres and retailing Regarding Omagh town, the main retail centre should be at the heart of the town from James Street and Castle Street to Market Street, Campsie.</p> <p>Further Comments: (a) No reference to provision of facilities, housing or halting sites for travellers. (b) RADON areas should be publicised. (c) Joined up approach in relation to planning matters needs to be prioritised. (d) References policies which in his opinion are not fit for purpose. See comments. (e) Doesn't understand the significance of change from 'significant' to 'appropriate' in para 12.39 in assessing wind farms. (f) Para 12.31 – Talks about awareness in local people of importance of environment and cultural heritage. (g) Important to recognise and reflect local people's views in plan preparation (h) Talks about water resources (i) Discusses Environmental Designations of European importance. Impacts on water resources. (j) Make role of English Crown Estates in issuing Mineral licenses apparent.</p>
<b>LDP 0235</b>	<p>Suggests that Cavanaleck is given status of a small settlement. Villages and small settlements require permission for more housing so that the rural communities continue as vibrant entities. It is essential that villages and small settlements are allowed to expand in terms of development however the style and character of housing developments needs to be addressed like that of England where housing is of different styles. Gortin and the Sperrins should be developed. Gortin/Newtownstewart could be developed as a visitor centre somewhere in this region which would make visiting the area much more enjoyable. Carrybridge should be developed as a visitor centre given its access to both Loughs and it's relatively close to the A4.</p>
<b>LDP 0238</b>	<p>Requests the LDP outlines a total prohibition on Fracking. Furthermore requests the following three changes:</p> <ul style="list-style-type: none"> <li>• Reduce definition of short term as explained in Option 2 of <i>Main Issue 7: Minerals Development</i> from 15 years to 5 years</li> </ul>

	<ul style="list-style-type: none"> <li>• The whole of the FODC should become an Area of Constrained Mineral Development</li> <li>• Need to be more explicit in opposing Fracking (and suggests alternative wording)</li> </ul>
<b>LDP 0239</b>	<p>Crown Estate licences minerals in Northern Ireland. While the desire to protect the AONB is fully understood and supported it is suggested that this could be achieved whilst still enabling potential minerals extraction. Taking the approach that a specific need for the mineral must be demonstrated rules out any form of mineral working in the AONB.</p> <p>Given the scale of the workings and the upfront investment that is required to set up and operate modern mineral sites and operate them to a high standard more than 15 years is preferable. The proposals are more restrictive than those in PPS 2: Natural Heritage which does not prevent all development in the AONB. There is a long history of mineral working in this area which has led to characteristics for which the AONB allocation has been made such as the geological ASSI Mountfield Old Quarry.</p> <p>The Plan should see to take account the landscape importance of the AONB, the likely impacts of development on a case by case basis and balance these with any other positive effects, including environmental, social and economic benefits of working minerals within the AONB.</p>
<b>LDP 0248</b>	<p>Need a detailed analysis of the amount of land available for development as opposed to the lands that have been zoned for development. Belleek is a perfect example of where major land banks are land locked and have no possible hope of being freed up within the life time of the plan.</p> <p>Current town boundary for Belleek cuts through some landowners holdings in a haphazard manor resulting in the entire landholding becoming almost worthless from a development point of view. Each town deserves and individual consultation on their existing town boundary and an in depth analysis of how minor changes could attract inward investment.</p> <p>There are many clusters of dwellings within rural areas that are nor associated with a focal point such as a community building/facility or located at crossroads. Many of these clusters have gap sites/infill sites which if developed would not impact on the wider landscape and would fill out an existing pattern of development. If such sites were allowed to be developed would allow rural non farming families to free up extra lands to young families seeking to establish a home in their indigenous community.</p> <p>A more balanced approach to the consideration of applications in areas that are affected by protected routes would give hope in instances where farming families can currently be refused permission for dwellings. In relation to Policy CTY 6 Personal and Domestic Circumstances of PPS 21 an analysis should be taken of the number of cases that have been approved over the years and used as a barometer of the success of the policy. In relation to CTY 10 Dwellings on Farms of PPS 21 where sites have</p>

	been granted and shared lands are required to meet policy that lending institutions have a problem in approving mortgages where shared right of way can affect the land term value of rural homes.
<b>LDP 0249 – Phelim McCorry</b>	<p>LDP 0249</p> <p>Questionnaire and separate submission submitted. Questionnaire indicates they mainly agree with the Main Issues. Where he has ticked ‘no’ he has indicated refer to ‘attached doc’.</p> <p>The separate submission indicates he does not agree with option for spatial growth strategy in his words ‘to only encourage spatial growth of the 2 main hubs..’. He believes the Council should encourage ‘balanced sustainable development’.</p> <p>He iterates the importance of existing business and their employees to the local area and the need to have services/facilities available for them.</p> <p>The submission requests the inclusion of a site within the settlement limit of Teemore and provides site analysis and policy context. Although he states ‘the current supply of commercial /industrial land in Teemore is inadequate’ no other information is supplied.</p>
<b>LDP 0251)</b>	<p><b>Main Issue 1: Spatial Growth Options</b> Agreed with the preferred option citing their site as one having achieved permission.</p> <p><b>Housing Allocation:</b> agree with housing allocation option stating that as a minimum existing settlement limits should be retained.</p> <p>Site Specific reference included.</p>
<b>LDP 0256 – 0259, 0288 – 0341, 0343 – 0460, 0465 – 0554, 0799 – 0801, 851, 852</b>	<p>Objection to fracking within the District Council Area.</p> <p>Suggest a wording to be included in the plan expressing the Council’s opposition to unconventional hydrocarbon exploitation and that the Council will oppose the granting of petroleum exploration licenses over the target strata.</p>
<b>LDP 0278</b>	Agrees with Council’s list of objectives. Identifies Cavanaleck/Cran as a potential small settlement which should be designated with reasoning.
<b>LDP 0279, 0284, 0461</b>	Agrees with Council’s list of objectives. The second indicates desire for Cavanaleck/Cran (Fivemiletown) as a potential small settlement which should be designated with reasoning.

<b>LDP 0285</b>	A site specific request for the inclusion of land at Dromore, Irvinestown within the new area plan (and as the majority of the previously housing zoned land in the Fermanagh Area Plan 2007 has now been developed).
<b>LDP 0286</b>	<p><b>Main Issue 4: Sustaining Rural Communities –</b> Disagreed with preferred option for sustaining rural communities: A copy of the draft Fermanagh Area Plan map for Killadeas was enclosed with the question – ‘not implemented – why?’ written on the draft plan map. The draft settlement limit was adopted in the Fermanagh Area Plan 2007. A typed letter accompanies the questionnaire relating to CTY6, PPS 21(Personal circumstances) States that they envisage themselves being in need of carer’s assistance in the near future and needing to build new accommodation. Live in a listed building and has stated they will not get permission to extend as required by CTY 6 ‘in a manner that would be acceptable to the Planning Department/Heritage Trust’. Under CTY6 they feel they will not be successful and feel CTY 10, as a non-farming family, is not relevant either.</p>
<b>LDP 0287</b>	<p>Whilst applauding the nature and content of the documents, they are concerned at the absence of reference of an intention to prohibit the exploration and extraction of petroleum from shale rock, tight seams and coal seams onshore. Concerned about the absence of a policy on Unconventional Gas Exploration and Extraction and no mention of the word ‘fracking’ or the phrase hydraulic fracturing.</p> <p>Mineral Development in the POP is not explicit enough in regard to fracking. Considers that FODC should have a presumption against fracking in the LDP. Moreover, feels that the deleterious impacts of fracking on air, water, soil cannot be limited by any regulation.</p> <p>Are “in favour of all Council initiatives to safeguard community assets, and support community empowerment especially regarding development of community owned renewable energy to create sustainable jobs, profit and energy for our community”.</p>
<b>LDP 0464</b>	<p>Makes a case as to why Necarne should be saved from private developers. Expresses concern that Irvinestown has no current zoned recreation land. Also expresses concern that the existing right of way through the land has not been included in the Expression of Interest process for Necarne.</p> <p>Reference made to Irvinestown plan which stated Necarne should come into ownership and control of the local community.</p> <p><b>Heritage:</b> Author refers to Built heritage at Risk Report which pointed to ‘community ownership as an appropriate future for Necarne’. The representation concludes by outlining the many benefits socially, physically and mentally to the local population of having a working facility such as Necarne. They have outlined the expenditure already undertaken.</p>
<b>LDP 0555 and 834</b>	Fracking will be detrimental of the both the health and economy of the FODC area (Supporting info provided from the Irish College of General Practitioners Forum Journal; report by the Economist Dr Brenna O’Roarty; article from Concerned Health Professionals of New York)

<p><b>LDP 0644 -</b></p>	<p>While the POP fully recognises the SPPS statement in relation to unconventional hydrocarbon exploitation, there is no policy in relation to exploration or development of unconventional hydrocarbons. As previous FODC council motion and Fermanagh Council consultation responses on petroleum licenses have opposed exploration or development the policy should be amended to reflect this in revised wording (which has been proposed).</p> <p>Welcomes extra protection offered by designation of areas of mineral constraint and suggests this could be extended to a presumption against mineral extraction for the entire district and given concern regarding the impact of mineral extraction on water (and as majority of area is within the water catchment and river basin area).</p> <p>Further concern with the proposed timescale of operations in areas of Mineral Constraints of 15 years as this be would be significant for any local resident and instead suggests reviews every 5 years to include consultation with local community.</p>
<p><b>LDP 0766</b></p>	<p>Gave a brief background to the retail sector in NI. They respond to Q which asks about the threshold above which a Retail Impact Assessment is required, agreeing the suggested area (1000m<sup>2</sup>) is an appropriate threshold above which retail developments outside town centres and not in accordance with an LDP should be accompanied by an LDP.</p> <p>Request that the LDP provides a planning framework which is supportive of locally accessible, convenience shopping.</p>
<p><b>LDP 0767</b></p>	<p>“Nowhere have we seen the complete model of sustainable development which FODC is working towards”</p> <p>The interaction of the Community Plan goals with the LDP policies will be key to the decision making process over the lifetime of both plans. Questions the weighting given to indicators.</p> <p>Claims ‘it would be remiss not to say there are serious conflicts with regards to Minerals Development (Goldmining), Petroleum Exploration (‘fracking’) and renewable energy (‘wind turbine proliferation’) within the Council District.</p> <p>Acknowledge difficulties in transition of Planning from DOE to Council but feel that the views of local communities should be expressed in the plan. In relation to the LDP, Minerals Development, claims ‘there is no policy stated with regards to exploration and/or development of unconventional hydrocarbons.</p> <p>Any request for Council comment on petroleum licensing should state clearly their opposition to same and re-iterate the stance of Fermanagh District Council in July 2014 opposing fracking. Requests the FODC stance should be that of FODC in assessing applications for small boreholes etc and reflected in the LDP.</p> <p>Suggests the whole of FODC should be made an Area of Constraint on Minerals Development. Recognises the location on the border and stresses the importance of also protecting river basins and water catchment areas suggesting an outright ban on Minerals Development on flood plains and water catchment and river basin areas.</p> <p>Suggests that the period for mineral extraction should be reduced from 15 years to 5 years.</p>

LDP 0768	<p><i>Overarching Policy for Renewable Energy Development</i> promote Option 1 above Option 2. The existing policy framework of SPPS and PPS18 already advocates a precautionary approach to siting wind energy proposals within AONBs, and a policy that goes beyond this would be contrary to the SPPSs overall objectives. Also the importance of these landscape designations at their boundaries is sometimes arbitrary and in some cases non-AONBs may be more sensitive landscapes.</p> <p>The focus of policy should be more on the sensitive siting of wind energy proposals rather than the total exclusion from some areas. Such a focus, on a case-by-case basis, would allow protection of sensitive landscapes while ensuring sufficient renewable energy is created. Also need to recognise the economic benefits to the region of wind energy developments and in terms of meeting key objective of <i>“to create better employment opportunities...”</i></p>
LDP 0771, 772	<p>Promotes a management plan to protect and promote the Sperrins AONB, and raises concerns with wind farm and mining development. Requests a Sperrins AONB SPG [as per Q16b] specifically, and in conjunction with adjoining authority. Requests consideration is given to an Area of Significant Archaeological Interest and an Area of Archaeological Potential within the Sperrins and linked to the Beaghmore ASAI [as per Q17].</p>
LDP 0781	<p>Opposes fracking in general and provides a suggested wording for the final LDP. Supports all community initiatives to safeguard community assets and support community empowerment especially in regard to development of community owned renewable energy to create sustainable jobs, profit and energy for our community.</p>
LDP 0782	<p>Mainly concerned with <b><u>Minerals Development.</u></b></p> <p>Welcomes that the POP recognises the presence of cement industry within FODC and the importance of the availability of high grade limestone to this industry. Consideration should be given to the nature of the reserve and local need when safeguarding mineral resources as proposed. Considerations should also be given to existing industry when safeguarding mineral resource areas.</p> <p>Generally welcome Option 3 as the Council’s preferred option but raise concerns with the constraint in certain areas and the time limits suggested. Request GSNi (Geological Survey Northern Ireland) and MAPB (Minerals and Petroleum Board) are involved when identifying areas of mineral safeguarding.</p>
LDP 0783	<p>Expresses concern over the potential commercial damage to the reputation of local food producers and the knock on effects if fracking were to proceed.</p> <p>Supports all Council initiatives to safeguard community assets and support community empowerment.</p>
LDP 803	<p>There needs to be greater support for long term sustainable infrastructure development by concentrating most of the new housing in Omagh and Enniskillen</p> <ul style="list-style-type: none"> <li>• Suggested The Church of Ireland yard at Glenroan Boloney as an Area of Significant Archaeological Interest</li> <li>• High St., Omagh should be a Primary Retail Core</li> </ul>
LDP 804	<p>Stricter policy in the Sperrins and other places that have the possibility of being used for other things. Visitor hubs should be located in the Gortin Glens and Sperrins.</p>
LDP 805	<p>A5 and broadband needs greater support. Killyclogher should be extended up the Tirquin Road.</p>

<b>LDP 806</b>	Cooneen/Coonian and The Knocks, Co. Fermanagh should be classed as settlements.
<b>LDP 807</b>	<p>Suitable economic development should be allowed in rural areas. Many heavy industrial enterprises are not compatible with adjacent residential uses. Consideration should be given to encouraging such development in appropriate rural areas.</p> <p>Minerals contribute to the economy particularly in rural areas and to the construction sector. Through restoration and monitoring, the quarrying industry provides many environmental benefits including long term improvements to biodiversity.</p>
<b>LDP 808</b>	<p>Killesher could be developed as an Ecovillage and would help regenerate that area whilst retaining its rural character. The development of 'small settlements' like an eco-village as referred to in the housing allocation sector should be explicitly included in option for small settlements.</p> <p>Land for economic development should be allocated for small settlements. In relation to renewable energy the threshold should be lowered and that 'low impact' sustainable build houses should be encouraged and favoured in all new builds and renovations.</p> <p>A low impact educational ecovillage in Killesher could be developed for tourism and help with regeneration of this small rural settlement. An existing barn or other outbuildings could be converted into an eco education hub, with interactive cottage industries and outdoor Eco Education Adventure Trail has the potential to be a significant Visitor Hub.</p> <p>There is an ancient fort by Arney River on the proposed site of the Eco Village that should be designated as an Area of Archaeological Potential. Mobile router hubs should be set up to address the 'not spots' issue.</p>
<b>LDP 809 and 864</b>	<p>Arvalee (Golan Crossroads) where Farmhill Road &amp; Arvalee Road meet the Deverney Road should be identified as a small settlement. In this rural area there are 32 houses comprising of 8 semi-detached houses, bungalows, two storey houses and Golan Care Home. Also in close proximity to this area there are 2 rural primary schools, a church, hospital, Adult day centre, RDA centre, rehabilitation units, Buddies Day Care facility, GAA pitch and numerous other dwellings and farmhouses. This area would therefore be suitable for further housing development in the future in order to sustain our rural community.</p> <p>The provision of a designated coach park is much needed in Omagh to facilitate coach loads of day trippers to the town and those stopping off en route to local tourist attractions such as the folk park. This would help generate much needed revenue in Omagh Town Centre.</p>
<b>LDP 810</b>	<p>Need to reflect cross border location and to bring a focus to regional needs/initiatives such as the A5 road and to deal with Brexit.</p> <p>Development plans should reflect dispersed rural living patterns rather than large settlements. The allocation of 1,407 'rural' houses is too few. Recognition of the impact of economic development land allocation on the housing. Big issue for minerals is in processing not extraction.</p>

	There should be a design Guide also to reflect development on the shores of Lough Erne.
<b>LDP 811</b>	The Sperrins area, the AONB and any areas near to settlements or housing, schools, rivers, water catchments, reservoirs or drinking sources, areas of environmental importance, protected bogs, areas of historic significance.
<b>LDP 812</b>	<p>Opposed to fracking and has suggested specific policy wording. There should be mineral constraint within the entire Geopark, the footprints of SACs, SSIs and similar special habitats.</p> <p>There should be a setback out in place from important water resources to protect water quality. Temporary mineral works should be reduced to 5 years or less. The Council need to prioritise community owned and community controlled energy.</p>
<b>LDP 813</b>	<p>Biodiversity, human and animal health and important landscapes need to be protected from inappropriate development such as hydrocarbon exploration and extraction. (put forward wording for policy)</p> <p>Where minerals development is considered appropriate it is vital to minimise its impacts upon local communities, landscape quality, built heritage and the water environment and to secure sustainable and safe restoration, including the appropriate re-use of minerals sites, at the earliest opportunity.</p> <p>Sufficient open space and indoor and outdoor recreation facilities will be provided. The One Planet Development Policy should be supported. Improved energy efficiency measures and a greater use of renewable energy sources will reduce greenhouse emissions, reduce fuel poverty and improved wellbeing. Need to provide safe, healthy and accessible shared space. Need to accommodate sustainable entrepreneurship and innovation.</p>
<b>LDP 814</b>	<p>Need to grow the towns between to the two hubs e.g. Irvinestown and Dromore. Growth should be focused along the major transport corridors A4, A32, A509 and A46.</p> <p>Encourage extensive re-use of derelict buildings before new ones are built. Economic land should be accessible to public transport provision. Empty commercial properties need to be reused.</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>There should be a presumption against fracking or other forms of destructive and poisonous expropriation.</p> <p>Cashel and Boho should be considered settlements. The integration of renewable energy and passive solar design should be an absolute requirement unless there are specific physical or technical feasibility constraints. It should be a requirement for new builds and renovations. There is a need to develop an AONB in Fermanagh Lakelands and the Geopark.</p>

<b>LDP 815</b>	<p>To maintain Sperrins AONB by banning precious metal mining and processing, including prohibiting the installation of further large scale including prohibiting the installation of further large scale wind farms. Need to cluster rural housing. Better connectivity to rural areas in terms of both telecommunications and roads e.g. Creggan</p> <p>Extraction of precious metal using chemical processing should be prohibited. Any chemical processing must not be in the vicinity of any watercourse either over or underground.</p> <p>Creggan should be a 'visitor hub'. There should be design guidance for the Sperrins AONB prohibiting gold mining.</p> <p>Copney stone circles, Mile lane Greencastle and local mass rocks should be identified as Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential.</p>
<b>LDP 816</b>	<ul style="list-style-type: none"> <li>• Suggested that AONBs, areas near settlements or dwellings, areas near rivers, water sources, reservoirs etc, development that may contaminate the water table, areas near school, environmentally sensitive areas should be designated Areas of Constraint on Mineral Development.</li> </ul>
<b>LDP 817</b>	<p>Boho should be recognised as a small settlement or similar. The Geopark, areas of scenic quality and other EU designated sites should be designated ACMDs. There is a need to take transitional issues into account.</p> <p>Belmore Mountain should be included on the list of areas considered sensitive to wind development.</p> <p>Mountain biking should be developed in Lough Navar/Ballintempo forests. Canoe trails should be developed on Macnean and Arney rivers.</p> <p>There is an opportunity site behind Mount Lourdes Grammar which should be changed to conservation to keep green space in the centre of Enniskillen town.</p>
<b>LDP 818</b>	<p>One Planet Development Policy should be taken into consideration. An Ecovillage should be developed in the Council area and it would help in addressing renewable, passive, solar and water management objectives.</p> <p>An Ecovillage would be considered a good quality attraction and an alternative tourist accommodation.</p>
<b>LDP 820</b>	<p>ACMD may hinder exploratory works.</p> <p>Option 1 of Minerals Development ie continue with the existing policies would be the preferred option with the addition of identifying areas for minerals safeguarding.</p>
<b>LDP 821</b>	<p>Would like to see a map of SCAs, RPAs and RCA.</p>

	<p>Fracking should be totally prohibited in the FODC area (provided specific wording for proposed policy). Any mineral development should be on a short term i.e. no longer than 5 years. Any restoration carried out should be the responsibility of the minerals industry and not the tax payer.</p> <p>Renewable energy should be encouraged and local communities should have a stake in the profit. Community owned renewable energy developments should be encouraged so to create sustainable jobs and energy for communities. All buildings should have to include renewable energy measures.</p> <p>The Geopark should be exploited more in terms of tourism</p>
<b>LDP 822</b>	<p>An Eco Village could be developed in the Killesher/Arny areas and based in the Welsh One Planet Development Policy. Development in the Countryside should be restricted to clusters unless agriculture occupancy conditions dictate otherwise.</p> <p>The threshold in relation to renewable energy should be lowered and all new builds and renovations should be low impact sustainable development.</p> <p>The Original Arney village should be developed as a low impact educational eco village and could be developed as a visitor hub.</p>
<b>LDP 823</b>	Opposed to fracking in the Council area (provided specific wording for proposed policy)
<b>LDP 824</b>	<p>Biodiversity and our most important landscapes should be protected from inappropriate development.</p> <p>ACMD should include the Sperrins AONB, areas in which populations or dwellings exist nearby and areas that have historic or cultural significance, or are environmentally sensitive.</p> <p>No more expansion of wind turbines in the AONB.</p>
<b>LDP 825</b>	FODC should adopt the One Planet Policy and follow the lead taken by the Welsh government.
<b>LDP 826</b>	Curraghinalt should be an ACMD due to its outstanding natural beauty.
<b>LDP 827</b>	Killyclogher District Development Association would like to see Killyclogher included as a village as it has a shop, church, ATM, pub/restaurant etc. It may prove difficult to pick up the boundary but would suggest the town land of Killyclogher itself. Allow more retail development within the Killyclogher area as the numbers are currently there to support.
<b>LDP 828</b>	Fracking should be totally prohibited in the FODC area (provided specific wording for proposed policy)
<b>LDP 829</b>	<p>Would like to see the development of an Ecovillage based on the One Planet Development policy of the Welsh Assembly. The original village of Arney beside the historic Arney bridge should be a settlement where an ecovillage could be developed which could also accommodate sheltered housing for elderly people from the area who do not want to live in an urban environment.</p> <p>Development in the countryside should be limited to clusters unless for agricultural occupancy. End the blight of electronic gates.</p>

	<p>Does not agree with Option 3 of Main Issue 2 Housing allocation, would prefer option 2 because if rural development is allowed to decline it will have a negative impact on local communities and lead to closure of local schools, shops, Doctors Surgeries and other essential services.</p> <p>The integration of renewable energy and passive solar design should be a requirement of ALL new development.</p> <p>In relation to tourism it is felt that a low impact Educational Ecovillage at Arney following the multi-award winning “Battles, Bricks and Bridges” project. It would help with the tourist experience and compliment the Marble Arch Caves and Florencecourt House. This area could also be developed as a Visitor Hub.</p>
<b>LDP 830</b>	<p>Fracking should be totally prohibited in the FODC area (provided specific wording for proposed policy)</p> <p>In relation the ACMDs it is felt that any areas close to where people live should not be considered for unconventional gas exploitation.</p> <p>Supports Ecovillages.</p>
<b>LDP 831</b>	<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>Try something new in relation to the spatial growth strategy.</p>
<b>LDP 832</b>	<p>The strategic vision should also incorporate One Plant Development policies which involve an “affordable and sustainable way for people to live and work on their own land, bringing, social, economic and environmental benefits.</p> <p>Ecotourism should be supported and combined with archaeological interest. In relation to the vacant sites within Enniskillen and Omagh ‘creative’ leasing to Artistic endeavours could be introduced similar to that in Temple Bar which will enhance and re-invigorate the town.</p>
<b>LDP 833</b>	<p>Against fracking and has suggested policy wording. Provided information from various reports and research carried out in different parts of America in relation to the consequences of fracking and provided links to each report.</p> <p>Proposals in relation mineral extraction should be short term.</p>
<b>LDP 835</b>	<p>Supports the planned Ecovillage in Fermanagh.</p>
<b>LDP 836</b>	<p>In relation to the vacant in Fermanagh and Omagh farmers and small local producers should be allow to set up stalls on a daily/weekly basis.</p>
<b>LDP 837</b>	<p>There is a need to prioritise environment.</p> <p>Option 2 is the preferred in relation to housing allocation as it caters more for persons wishing to live in rural areas where they grew up. Centralisation of the population will further reduce the services available to rural communities.</p>

	<p>Small scale tourist projects should be used to sustain rural communities as opposed to inviting large industrial developments such as goldmining and windfarms. The mining or extraction of precious minerals must not be allowed in environmentally sensitive areas. Temporary exploratory and prospecting works must not be allowed as there should be blanket ban on mining in environmentally sensitive areas. The entirety of the Sperrins AONB and all areas designated for their environmental/historical importance should be deemed ACMDs.</p> <p>FODC must address the impact of BREXIT on environmentally sensitive areas and areas of archaeological interest. There should be a prohibition on windfarms in the Sperrins AONB and all areas with protected designations. Any applications to extend windfarms within these areas should be refused. Bilingual signage should be adopted on townland boundaries over the FODC area. The natural beauty, history, wildlife, and archaeological sites within the AONB needs to be promoted.</p> <p>Wants to see 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.</p>
<b>LDP 838</b>	<p>Would like to see inclusion for an Ecovillage to be enabled as a low impact development under a One Planet Development policy.</p> <p>Fracking should be permanently banned in FODC area.</p>
<b>LDP 839</b>	<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. Given the nature and importance of protecting and enhancing town centre vitality and viability recognition of such would straddle all three areas of the Strategic Objectives – Social, Economic and Environmental.</p> <p>The preferred option 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 should be a clear distinction in the introductory text for ‘Economic Development’ to draw a clear distinction between economic development as related to B Class Uses and other commercial development related to town centre uses such a retail and leisure.</p> <p>The recent growth in Northern Ireland in office type industries such as information technology and financial services, points to a need for a more flexible approach when determining the types of economic development that are acceptable in particular</p>

	<p>locations and that land zoned for economic development should be seen as supporting a whole range of uses, apart from retailing, and not just the traditional manufacturing sector.</p> <p>It would be appropriate to introduce control of signage through supplementary design guide for the relevant areas.</p> <p>The 1,000 sq m gross external area is inappropriate as in the case of Enniskillen and Omagh, average comparison and convenience unit sizes are far below 1,000 sq. m. It would allow large scale units of 999 sq. m to be promoted in smaller towns and villages. Also 1,000 sq m in an out of centre location in any of the local towns or even main towns is likely to be very damaging to the vitality and viability of the associated town centre given the limited population growth and increase in expenditure capacity forecast for the emerging plan period.</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. This is in the interests of improving the vitality and viability of the centres in the most sustainable locations for all residents. There is a need to update the quantitative retail capacity figures for the District.</p>
<b>LDP 0840</b>	<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 FODC. The rural build rate cannot be controlled so more land must be in main settlements to ensure balance, choice, flexibility and delivery of as much housing as possible.</p> <p>Economic land allocations must be generous and not based on a formulaic approach. There is no downside to 'overzoning'. The case of Carrickmore demonstrated that where allocations are generous there is more likely to be economic activity.</p> <p>New tourism development should be strictly controlled in and around the lake shores, unless small in scale and can be proven to be sustainable in environmental and economic terms. Visitor hubs should only be within settlements or where there is already substantial tourism development. Where such facilities exist, the hubs should only facilitate expansion or consolidation of existing facilities, not extensive new developments. It is essential that the lakes and shores are protected from new development. Development should be limited to expansion or consolidation of existing facilities. New facilities of any substantial scale should be located in settlements.</p>
<b>LDP 841</b>	<p>CTY10 of PPS 21 is too restrictive in allowing only one permission every 10 years and has disadvantaged small farmer's families. Policy should be reviewed to allow more than one dwelling where there is a demonstrable need.</p>
<b>LDP 842</b>	<p>Curraghinalt should be considered as an Area of Significant Archaeological Interest and/or Areas of Archaeological Potential.</p>
<b>LDP 843</b>	<p>Proposed ecovillage near Florencecourt. There should be an emphasis on sustainable housing in the countryside backed up by protecting the necessary infrastructure.</p>

	<p>There should be provision of accommodation for older people in Bellanaleck to keep them in the community. Strongly against fracking.</p> <p>A small hotel or similar should be developed in Bellanaleck which would be a suitable area to develop as a 'visitor hub'. Restrict the use of Jet skis on the lake and more jetties but restrict the number of parked crafts.</p> <p>Arney River Valley, Cleenish Island, Bellanaleck geology should be designated as an Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential. Draw up ample signage.</p>
<b>LDP 844</b>	<p>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>Option 1 would be the preferred in relation to economic development land allocation would result in lower car usage/mileage by workers who reside in the local towns.</p> <p>There should be a more open minded approach to encourage economic growth in the countryside, villages and small towns so that potential start-up businesses can be encouraged right across the region.</p>
<b>LDP 846</b>	<p>Baronscourt lies within the Derry City and Strabane District Council area. Bessy Bell Area of Scenic Quality resides within and is owned by Baronscourt. The estate has accommodated wind energy development since its earliest days located on Bessy Bell of which there are currently 2 windfarms Bessy Bell 1 and 2. SSE operates the windfarms and currently pursuing plans to decommission Bessy Bell 1 which is known as Bessy Bell 3 and is vital to the Estate's plan to continue to manage and preserve Baronscourt's built and cultural heritage for both present and future generations.</p> <p>The Bessy Bell site an excellent opportunity to secure greater renewable energy whilst not compromising the landscape. The presence of a wind farm since 1995 means that this form of renewable energy development is already established and therefore lends itself favourably to future redevelopment which takes advantage of greater economies of scale, the existing infrastructure (roads etc) and the quality of the site in terms of its wind resource. It is felt that Bessy Bell ASQ should not be deemed unsuitable for wind farm due to the fact there is already a wind farm in place and the strategic importance of wind energy to the Estate. A restrictive, indeed prohibitive, planning policy adopted by FODC in respect to Bessy Bell would undermine the repowering prospects for Bessy Bell 1.</p> <p>Bessy Bell ASQ status was designated after the construction of the Bessy Bell wind farm, clearly demonstrating that the presence of wind farms does not have an adverse impact on the ability of a landscape to be deemed an ASQ. If an LCA can accommodate an ASQ which in itself accommodates a wind farm, then the conclusion that the "overall capacity" of the landscape to "absorb development is considered low" appears unconsidered and unacceptably absolute in its determination and makes no allowance for the fact that a wind farm is already within the landscape and therefore that such developments can be sensitively designed in such a way that wind energy development could be successfully absorbed into the landscape.</p>

	<p>Wind energy is an important source of income for Baronscourt Estate. The Council is urged to ensure that planning policy supports wind energy developments.</p>
<b>LDP 847</b>	<p>Protecting the natural environment and rich natural resources in the area should come before economic considerations in relation to the vision and strategic objectives. Mechanisms must be put in place to facilitate rural dwellers to allow for people who grew up in the countryside and wish to raise their families there are able to do so. There is inadequate housing for people in areas such as Creggan, Greencastle, Carrickmore as landowners are not willing to sell sites. Concerns over the zonal limits of SCAs as need further detail to determine support.</p> <p>There needs to be a distinction made between the quarrying of aggregates such as sand or gravel and the mining of precious metals such as gold/silver due to the severe consequences of this type of industry. Goldmining should be viewed in the same way as hydrocarbon extraction/fracking, with a presumption against such activity.</p> <p>The Sperrins AONB, along with ASSIs, SACs and nature conservation areas and sites of archaeological interest within the district should be designated as an ACMB.</p> <p>The Curraghinalt mining project stopped before more irreversible harm is caused in the area. The industrialisation of the Sperrins needs to be recognised and stopped. It is concerning that 15 years is considered short term in relation to mining as a lot of devastation and pollution could be allowed in this amount of time.</p> <p>On shore wind farms are causing health problems. Electricity sub stations are generating electro-magnetic fields which are believed to be causing diseases such as cancers.</p> <p>Large scale windfarms should be located off shore. No windfarms in the Sperrins AONB. Fibre optic cabling should be laid underground along main roads throughout the council area so people have the opportunity to connect to it.</p> <p>Omagh town centre should remain the same as it is.</p>
<b>LDP 848</b>	<p>No mining especially gold</p>
<b>LDP 849</b>	<p>More needs to be done to protect our AONB and surrounding areas. The Sperrins AONB is an untapped resource in terms of recreation al tourism. There are many other walking/cycling routes which could be developed in the area.</p> <p>More investigation into the historic significance of the “Green Road” in Greencastle, its use in historic events and links to Tullyhogue in the Mid Ulster District.</p>

	Advertisements should be allowed in rural locations where they do not integrate into the surroundings.
<b>LDP 850</b>	<p>There needs a joined up approach with other Councils in relation to tourism in the Sperrins. Greencastle, Rousky, Gortin/Sperrins Hubs should be developed like Central Parcs that exist in England. Green Road PROW and Mass Rocks in FODC area should be identified as Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential.</p> <p>Supplementary Planning design guidance and a management plan in conjunction with adjoining AONB Councils should be established to protect and promote the sensitive, historic and archaeological landscape of the Sperrins AONB. FODC should identify a further Area of Significant Archaeological Interest and an Area of Archaeological Potential linked to the existing Beaghmore Area of Significant Archaeological Interest (ASAI). The archaeology in FODC is equal in significance to that found in Beaghmore ASAI. The scenic, cultural, natural and archaeological heritage of the Sperrins AONB should be protected from industrialisation thus enabling future generations to inhabit and enjoy this sensitive, prehistoric landscape.</p>
<b>LDP 853</b>	<p>Fermanagh and Omagh council area is graced with a high asset value in terms of the Archaeological, Built and Natural Heritage of its area. These assets combine to form a historic landscape of great scenic value. This Heritage Asset is fundamental to the quality of life and well-being of the communities within the Borough over the coming decades. The heritage assets of Fermanagh and Omagh council also form a significant component of Northern Ireland's wider heritage significance which is of great value to visitors and tourists to the region.</p> <p>Unfortunately, many heritage assets have suffered substantial damage in previous decades, due to an emphasis on traffic management, retail and housing development, with a lower priority given to sensitive design and to the conservation and regeneration of heritage assets for the benefit of residents and visitors alike.</p> <p>Welcome opportunity for a more enlightened approach from the new Council, that recognises that the 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. We believe that Fermanagh and Omagh council can also take pride in the quality of their heritage assets and that they are a positive contributor to the offering of Northern Ireland as a visitor destination.</p> <p>Existing policy and design guidance in Northern Ireland demonstrates that it is possible to integrate good quality design, location and mitigation factors in new developments both in rural, village and urban settings, in a way that conserves and enhances the heritage assets of the borough while meeting people's current and future needs. It is hoped that Fermanagh and Omagh council adopts available best practice in new developments, by integrating developments with the Council's unique heritage selling points.</p>
<b>LDP 855, 856, 857, 858, 860, 871, 872</b>	<p>Cavanleck / Cran which is at the edge of FODC district should be recognised as a small settlement for the following reasons: To give it a distinct identify from neighbouring Fivemiletown which is within Mid Ulster; It has a Church and Manse; There are two community halls in Cavanleck. The Presbyterian Church hall operates a 'Mums and Tots', sewing club and junior youth club on a weekly basis in addition to traditional church activities; Clogher Valley Rugby Club with pitches/clubhouse at Cran – adjacent to</p>

	<p>the Church and Golf Club; Clogher Golf Club; Rusks Restaurant at the Golf Club; Self-catering holiday accommodation; Residential properties – this settlement has individual properties of various periods, styles and character; Acheson &amp; Glover Ltd is a major employer nearby; This location is the ‘Gateway’ to FODC; The roads in Cavanaleck /Cran are popular for cyclists, walkers and runners; A shared and supporting community within this settlement.</p>
<b>LDP 859</b>	<p>Tourism proposals should be encouraged throughout FODC. The Fermanagh Lakelands are a key tourism destination. A greater focus should be given to tourism proposals that are either within or adjacent to the local towns, villages and small settlements, particularly those that have the potential to cluster with other tourism assets/attractions, to help encourage all year round activities and which can provide a wider range of services to benefit visitors and existing residents alike.</p> <p>Recognition of Carrybridge as a Tourism Designation and Visitor Hub could help attract other inward investment and services which will strengthen and consolidate the tourism role of Carrybridge. The FAP2007 notes that Carrybridge is currently the main tourism centre on the Upper Lough with a hotel, boat yard and picnic area/car park and that it has potential for expansion of these facilities to consolidate the tourism role of the village. Carrybridge has public jetties and marina and acts as an important rest point for boats and cruisers. The Carrybridge Hotel previously has planning permission for redevelopment but due to previous lack of investment, these plans did not advance.</p>
<b>LDP 861</b>	<p>Seek policies to be included in the plan to protect the existing zoned industrial land surrounding their factory complex at Strathroy Road. It would also welcome positive policies to facilitate the expansion of large sale industrial and employment uses where it encroaches in rural areas such as the Strathroy site.</p> <p>Often one of the greatest challenges to industrial businesses is the need to react quickly to changing markets and erect new plant or machinery to respond to market demands. This can be encumbered if incompatible land uses are permitted on adjoining or proximate lands. Specifically, Strathroy would encourage the Council to resist none – employment/industrial land uses on the lands surrounding it’s long established site at Strathroy Road, Omagh.</p>
<b>LDP 862 &amp; 863</b>	<p>Fintona and Clabby could also benefit from re-development of existing retail/commercial property.</p> <p>Housing should be broadly allocated on a pro-rata basis relative to the settlement size whilst also considering demand, need and environmental impact etc.</p> <p>Fintona needs re-generation. There has been a huge loss of businesses in recent years. Sixmilecross also needs support and re-generation. Tourism facilities and accommodation should be developed in Gortin, Killadeas, Mountjoy, Carrybridge, Belcoo, Belleek, Sixmilecross and Brookeborough Gortin would make an ideal hub to visit the lakes and Glens and surrounding countryside towards Newtownstewart, Gorticashel/Glenhull. Mountjoy is near the Mellon Park and has a great scenery along the Strule river.</p>

	<p>Sixmilecross should be designated as a tourist hub as it is in the heart of the Marshall countryside. In Fermanagh possible hubs near Belcoo, Belleek, Kesh, Carrybridge and Killadeas. The main towns of Omagh and Enniskillen have a lot to offer visitors and tourists.</p> <p>High Street/Market Street and down Campsie should be considered as part of the Primary Retail core of Omagh.</p>
<b>LDP 865</b>	The Sperrins should be considered as Areas of Constraint on Mineral Development.
<b>LDP 866</b>	Need an extra category to consider dispersed rural community areas or areas with a community association/community focus area and ensure they are represented within the countryside. Gortin Glens and the Sperrins to be considered as Visitor Hubs.
<b>LDP 867</b>	<p>The Council should not allow any mineral prospecting, exploration or mining in the Sperrins AONB. Specifically goldmining because of the damage it causes to the environment, to water, air and people's health. FODC should block the goldmining application in the Greencastle/Gortin/Rousky area immediately. The whole Sperrins AONB, ASSIs and SACs should be an Area of Constraint on Mineral Development.</p> <p>Wind Farms should not be allowed in any part of the Sperrins AONB. Any existing ones in the AONB should be decommissioned asap. Solar panels could be encouraged in future. An Creagán Visitor Centre which is conveniently located as a Gateway to the Sperrins and in the centre of a rich archaeological area and former Gaeltacht area, rich in cultural heritage should be developed as a Visitor Hub.</p> <p>Electricity substations and telecommunications masts should be allowed in the Sperrins AONB or near people's homes. The vacant sites in Omagh and Enniskillen should be used for housing homeless people, more parks and to grow trees on.</p>
<b>LDP 868</b>	<p>There should be a presumption of a total prohibition on Fracking in the FODC area as Fermanagh Council unanimously resolved on the 30<sup>th</sup> July 2014 when it backed a motion stating:</p> <p><i>"That this Council totally opposes shale gas exploration and extraction by the process of hydraulic fracturing, otherwise known as 'fracking' also provided specific policy wording.</i></p>
<b>LDP 869</b>	<p>People should also come first followed by environment and then the economy. The welfare of people and the environment are major drivers in achieving a sustainable economy. To reflect this on a district wide approach we would welcome the objectives to be stated in the plan in the following order, Social, Environmental and Economic. Planning should be given to small clachans of 5 to 15 houses in existing clachan areas which are on dead end roads or lane-ways, map attached with the areas highlighted.</p> <p>The Sperrins AONB, Areas of Natural Conservation Interest and Areas of Archaeological Potential, The Murrins Nature Reserve, ASSIs, SACs, European Priority Habitats, Ramsar Sites, Geological ASSIs, and all other Nation &amp; Local Nature Reserves should</p>

	<p>be considered as Areas of Mineral Constraint. These restrictions on mineral development are vital to the sustainable development in rural areas.</p> <p>Sensitive &amp; sustainable economic development should be considered in AONBs where the developments are not detrimental to the environment. The Sperrins AONB should also have a Wind Farm Constraint. The development of tourism must consider Areas of Natural Conservation Interest, Areas of Archaeological Potential and Sperrins AONB.</p> <p>Tourism facilities and accommodation should be developed around visitor hubs (Environment, Archaeology, Genealogy, Culture/Heritage and Activates) that can maximise the growing potential in this market. There should be a restriction of tourism development at Black Bog, Murrins, Areas of Natural Conservation Interest and Areas of Archaeological Potential. An Creagán, Loughmacrory and Gortin Village should be considered as Visitor Hubs.</p> <p>Consideration must be given to work with neighbouring local authorities to ensure there is agreed good design and place making. Signs should be branded to reflect the tourism product on offer, this is especially necessary in the Sperrins AONB. It is vital to ensure there is planning design guidelines agreed for the Sperrins AONB with neighbouring Councils. The Sperrins AONB should be branded similar to regions with National Parks.</p> <p>Within a 6 mile radius of An Creagán there are in excess of 75 archaeological sites which should be considered as Areas of Archaeological Interest and Areas of Archaeological Potential. The Council should develop a charter for good design in signs which would be adopted throughout the district and agreement with bordering Councils where possible.</p> <p>The telecommunications service could be delivered in existing service ducts and lines with no new infrastructure. Vacant sites should be considered for social housing and recreation/green areas, this will create a better place for people to live and work in.</p>
<b>LDP 870</b>	<p>Factors other than relative settlement size should be considered. The specific nature and character of the settlement needs to be considered. Carrybridge and Killadeas have tourism potential. Located within easy access to places of employments such as Magurriesbridge, Lisbellaw, Lisnaskea, Tamlaght and Enniskillen. The A4 main road connecting to the greater NI and ROI is also located within easy access of the Carrybridge. A new housing development has commenced on zoned land. Sufficient land needs to be zoned to meet the resident and leisure/tourist need in this locality. There is a demand for purpose built housing for elderly and people with mobility problems. Carrybridge could be a place for people to retire to.</p> <p>Small settlements should be allowed to develop without the loss of character and still maintaining rural services, amenities and communities.</p>

	<p>Possible 'Visitor hubs': - Kesh, Carrybridge, Lisnarick, Killadeas, Belcoo, Garrison, Belleek, Gortin, Mountjoy, Brookeborough, Omagh, Enniskillen, Lisnaskea, Sixmilecross, Glenhull, Seskinore. The tourist features/amenities and aspects of original character should be considered when determining the relative tourist value of each tourist hub.</p> <p>The existing key access points around Enniskillen, Killadeas, Kesh and Carrybridge should be maintained and enhance to provide better access to the loughs and waterways. Garrison, Monea/Tully, Newtownbutler, Islands off Lough Erne, Creggan, Drumquin houle be considered as Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential.</p> <p>Examples of appropriate signage controls on settlements of all sizes and scale across England &amp; Scotland in places such as Stirling, Bath, Cotswolds and the Yorkshire Dales.</p> <p>The Primary retail core of Enniskillen should include the town centre from Belmore Street to the Hollow (and up to the Churches), Derrychara/Erneside and Railway Street should be considered</p>
<b>LDP 873</b>	<p>The characteristics of each settlement as well as its size needs to be considered as some offer more in terms of business development e.g. Carrickmore and Lisnaskea some offer more in terms of tourism eg Gortin, Carrybridge and others are in need of regeneration eg Fintona and Sixmilecross. Fintona needs economic re generation, particularly the Main Street. Villages such as Sixmilecross and Clabby could also benefit from the re development of existing retail/commercial sites and economic development generally.</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 develop. For instance a growing village like Seskinore needs a new Primary School and scope for businesses to develop to meet the community need.</p> <p>There are places in Fermanagh and Tyrone that would be good tourist hubs such as a Mountjoy, Gortin, Omagh, Enniskillen, Kesh, Carrybridge, Killadeas, Belcoo and Belleek. Extensive consultations need to happen with local residents before granting additional approval for more communication masts. Masts should be discreetly positioned reducing the environmental impact.</p> <p>The Primary retail core of Omagh should be High Street, Market Street and Campsie. The 'Old Scotts Mill' site should be redeveloped. It is important to maintain the town centre businesses when the schools move out.</p>
<b>LDP 874</b>	<p>Map attached of lands that could be added as an extension to the housing zone H19 in the FAP 2007.</p>
<b>LDP 875</b>	<p>Many rural communities are built around their primary school provision attracting young families to the areas, acting as a hub where communities based around families are nurtured and grow. The rural primary school provision is currently undergoing</p>

	<p>major changes based on attendance figure requirements which do not lend themselves to sustaining rural communities, forcing many young families to relocate to the larger urban centres where the majority then settle, in a form of social engineering that perpetuates a cycle of growth in the larger urban centres and a cycle of decline in the rural communities.</p> <p>There should be no threshold in relation to Integrated Renewable Energy and Passive Solar Design. It should apply to all new development, private or public, with more stringent energy requirements incorporated if the Council is serious about meeting its own environmental targets.</p> <p>A requirement for Passive House certified design for all new buildings should be applied. A requirement to build to the Passive House design standards should be a requirement for development above the thresholds of 1 hectare or 1000m<sup>2</sup>. A requirement to build to these standards has the benefit of helping the council meet its proposed environmental and social standards by improving air quality and insulation standards in housing but also reduces fuel poverty as the Passive House certified standard has been proven over 25 years of testing to reduce the energy requirements for building by up to 90%. This would also place the Council as leaders as we move towards the Nearly Zero Energy Building requirements in 2019/21, with the potential to develop the Council area as a centre of excellence, and create enjoyment opportunities as a result.</p>
<p><b>LDP 876</b></p>	<p>Does not agree with the Council's list of objectives. Protection of the environment needs to be at the forefront of the proposed policy. Historical, archaeological, heritages sites, AONB, ASSIs and other natural resources that need to be protected.</p> <p>Brexit, along with opportunities and challenges needs to be addressed in terms of cross boarder co – operation in areas such as tourism, communications, service provision and farming, which the Option Paper does not adequately cover.</p> <p>Townlands and Clachans has not been given sufficient recognition in imposed planning strategies. The increased role of rural dwellers (not just farmers), as custodians of the countryside has to be acknowledged.</p> <p>Need to differentiate amongst the type of business allowed eg small tourism/crafts/dwellings in an AONB or other protected areas.</p> <p>In relation to Housing Allocation the pull towards the centre will continue, but the impact on more rural communities, if these are viewed by the council as assets, need to be examined and other, locally designed models considered. Why should rural dwellers be forced into the main towns of Enniskillen and Omagh.</p> <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 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>Within the AONB and other protected areas there should no industrial development which would negatively impact on the environment such as goldmining or mass wind farms. Small scale tourism facilities should be considered within the AONB.</p>

There is a skewed interpretation of sustainable which needs to be corrected in relation to the section on sustaining rural communities.

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.

As unemployment is highest and most difficult to address in areas of high deprivation, it would be important that the Council consider community based responses to these issues. The reality is that in the absence of additional measures, jobs created may not address the issue.

The term 'SCA' should state clearly what it includes AONB, ASSIs etc, but small scale development should be considered where it can demonstrate that it is sensitive to the landscape and sustainable, with not detrimental effects on the environment. There should be no industrialisation in the Sperrins AONB, SACs and ASSIs ie no mining for gold or other precious minerals, no mass wind farms, no electrical substations and no 'short term' so called prospecting or exploratory works in such areas.

Agrees with the SPPS direction against fracking and FODC should insist in the same for gold mining and precious minerals. A differentiation should be made between gold mining and sand and gravel as the latter does not have the same environmental impacts as gold mining.

The entire Sperrins AONB should be considered as a ACMD as well as all the ASSIs, SACs, areas of nature conservation and archaeological interest, and areas of high scenic quality.

The extraction of precious minerals in areas of environmental sensitivity impacting on e.g. AONB, ASSI, SACS or ACMD should not be permitted given the risk from acid water, and additional risk of long term damage to the water, air and health from heavy metal discharges and toxic leaching. In view of the limited experience of planners in these matters independent international expertise and experience needs to be employed and the precautionary approach to the consideration of cumulative impacts is essential.

There should be no more wind farms in the Sperrins AONB or in other protected areas, also proposals to extend or replace existing wind farms should not be permitted; instead they should be decommissioned. FODC should immediately undertake a review to consider the impacts of wind turbines and that should be completed before any new policy is out in place. Given the new evidence that is available, no further turbines should be allowed until there is proof that the wind farms and there supporting infrastructure are not damaging people's health and the environment. The health impacts from electricity substations, the risks from locating electricity substations close to dwellings, the added risks of substations that both distribute and receive electricity need to be reviewed in light of best current international evidence.

The Sperrins is a 'lived in' environment and the people are part of the tourism package in this sustainable rural tourism offering. Environmentally destructive development, industrialisation, mining and precious mineral extraction and wind farm should not be

allowed – the role and advice of Landscape Architects Branch is important in this. Signage should be provided for events and people of historical, cultural and political significance, identifying the Sperrin AONB and the Tyrone Gaeltacht and bilingual townland signage.

The area around the Visitor hubs should be developed. Development should be restrictive the Black Bog, the Murrins and archaeological sites.

The Sperrins AONB needs to be sold as a whole entity, not be four councils mentioning their 'piece' of the area. The Sperrins AONB is the only AONB not to have a Management Committee or Worker. Guidance for houses in the Sperrins should not detract from the practical and living requirements of people in the area and it is important that people continue to live in the AONB. Industrialisation in the AONB threatens the riverwater for aquatic life and for fishing and threatens the amenity of the area and is a huge treat to tourism and the entire life of the area.

There is an urgent need to list Omagh District's Archaeological Sites e. g. within a six mile radius of An Creagan Centre there are 75 known known archaeological sites as Areas of Significant Archaeological Interest and/or Areas of Archaeological Potential as there is a risk that these important tourism and educational resources will be lost, damaged or removed.

The Copney Stone Circles and those on Cashel Hill should be designated as LLPA.

Signage should reflect the area and its character along with the county as there is a fear that Tyrone is being removed from maps.

Telecommunications masts should not be sited in AONBs or ASSIs or near residential homes.

Vacant sites in Enniskillen and Omagh town centres should be used for social housing, green areas and recreation.

There is no mention of the provision of facilities, housing or halting sites for travellers.

**APPENDIX 4 - Summary Table of Consultation Responses on Local Development Plan: Interim Sustainability Appraisal Report: September 2016**

Consultation Body	Summary
Dept of Infrastructure (DofI)	<p>[ANNEX 1: DFI Planning response - para 4.0 to 4.3]</p> <ul style="list-style-type: none"> <li>• Concern that the Council has not demonstrated how Preferred Option has been informed by the SA and potentially impacting on 'soundness' of plan</li> </ul> <p>[ANNEX 1: DFI Planning response - para 18.4]</p> <ul style="list-style-type: none"> <li>• 'Carried Forward Policies' should also be tested through SA, and evidence of this is required.</li> </ul> <p>[ANNEX 2: DFI Non-Planning business area response – Water and Drainage Policy Division (p.15)]</p> <ul style="list-style-type: none"> <li>• <i>Sustainable Water – A Long Term Water Strategy 2015-2040</i> should be included in the Glossary and Appendix 2</li> </ul>
Derry City & Strabane District Council	<p>[Letter of Proinsias McCaughey, Head of Planning dated 25<sup>th</sup> November 2016]</p> <ul style="list-style-type: none"> <li>• Notes contents of LDP POP Sustainability Appraisal Interim Report</li> </ul>
Historic Environment Division (HED), Dept for Communities	<p>[Comments have been added directly to a version of the Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices]</p> <ul style="list-style-type: none"> <li>• In response to '<i>Figure 4: Significant Effects of LDP POP, objective 14</i>'. Disputes that -ve effects of development relate to greenfield land or settlement edges and as 'Areas of Archaeological Potential' relate to urban centres and historic cores</li> <li>• Comment in relation to '<i>Section 4. Strategic Cumulative Effects</i>'. Suggest inclusion of "...and conservation..." to end of "...the LDP policies will include policies supporting their protection..."</li> <li>• Comment at '<i>Section 5. Mitigation and Monitoring</i>'. Requests clarification on meaning of "...the impacts of new digital infrastructure on the historic environment could be considered more fully"</li> <li>• Comment at '<i>Main Issue 2: Housing Allocation objective 14</i>'. "Should look toward regeneration and usage of non-designated heritage assets and industrial heritage"</li> </ul>

	<ul style="list-style-type: none"> <li>• Comment at <i>'Main Issue 6: Economic Development - Addressing Deprivation / Regeneration in the Rural Area objective 14'</i>. "Possible to introduce policies favouring use of non-designated heritage assets/industrial heritage"</li> <li>• Comment at <i>'Main Issue 8: Overarching Policy for Renewable Energy Development objective 14'</i>. Low carbon energy can have serious -ve impacts on below ground remains and setting of key sites and historic landscapes. Query if visual impact is being considered separately.</li> <li>• Comment at <i>'Main Issue 9: Integrated Renewable Energy and Passive Solar Design objective 14'</i>. Query the assessment that there is no direct relationship between the policy options and the historic environment particularly listed structures/works in conservation areas.</li> <li>• Comment at <i>'Main Issue 12: Lakes and Waterways objective 14'</i>. "Could also impact on historic waterside infrastructure associated with heritage assets/freshwater archaeological remains/shipwrecks"</li> <li>• Comment at <i>'Main Issue 12: Lakes and Waterways 'Comments and Mitigation''</i>. The focus should not solely be mitigation but also evaluative work may be required during the planning process to inform decision making.</li> </ul>
<p>Dept of Agriculture, Environment and Rural Affairs (DAERA)</p>	<p>[Letter of Dr Mark Hammond dated 28<sup>th</sup> November 2016]</p> <ul style="list-style-type: none"> <li>• General – preference for more detail on environmental issues to understand assessment matrices. Expect further detail on mitigation needed where significant -ve effects. Level of detail may not be acceptable at a later stage.</li> </ul> <p>[Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices]</p> <ul style="list-style-type: none"> <li>• Comment on <i>'Main Issue 1: Spatial Growth Options objective 12, option 3'</i>. Should be recognised that this option could impact on biodiversity as it promotes growth within the countryside and therefore has a greater potential to impact on species and habitat, and subsequent to impact on water and air quality.</li> <li>• Comment on <i>'Main Issue 2: Housing Allocations objective 8, 11 and 15, option 2'</i>. Should be a -ve impact on air quality as dispersal increases car use. Could negatively impact on climate change.</li> <li>• Comment on <i>'Main Issue 2: Housing Allocations objective 12, option 3'</i>. More likely to have a -ve impact on species and habitats and mitigation would be required. It should be recognised that brownfield/previously developed land should consider biodiversity as some rarer invertebrates and plants rely on disturbed sites, and some sites may be priority habitats under the 'Open Mosaic Habitats on Previously Developed Land'. Appropriate survey are required prior to development or zoning.</li> </ul>

- Comment on *'Main Issue 2: Housing Allocations objective 13, option 2 & 3'*. Option 2 should have significant -ve effects and Option 3 -ve effects due to increase development in the wider countryside
- Comment on *'Main Issue 2: Housing Allocations objective 17, option 1 & 3'*. There should be a difference between these options and as Option 3 will result in some Greenfield development which would be less sustainable.
- Comment on *'Main Issue 2: Housing Allocations objective 22, option 2 & 3'*. Should not be +ve. No evidence of discussion between various options.
- Comment on *'Main Issue 4: Sustaining Rural Communities objective 12, option 2'*. This will increase development in the Rural Protection Areas (RPAs) although Natural Heritage (NH) sites would be excluded. Development can indirectly affect sites from disturbance (e.g. impact on water quality from septic tanks). Functional buffers around sites and streams flowing into sites should be established.
- Comment on *'Main Issue 5 & 6: Economic Development: Addressing Deprivation/Regeneration in Urban Areas objective 12, option 1 & 2'*. Reuse of buildings in the countryside has potential to impact on breeding birds and bats. As such, mitigation should be highlighted in final policy of option 1. Option 2 has potential to negatively impact on biodiversity with greater development promoted in the countryside.
- Comment on *'Main Issue 5 & 6: Economic Development: Addressing Deprivation/Regeneration in Urban Areas objective 13, option 1'*. Potential +ve effects as it would reduce dereliction and combined with sensitive retention and reuse of older buildings.
- Comment on *'Main Issue 8: Overarching Policy for Renewable Energy objective 10'*. Needs to be recognised that renewable energy development has the potential to impact on water quality when on peat due to peat slide events. Option 2 reduces this impact as lots of peatland areas are also highly valuable landscapes.
- Comment on *'Main Issue 8: Overarching Policy for Renewable Energy objective 12, option 1'*. Additional -ve risk if biodiversity information is not included as there would be presumption for renewable development which may impact on biodiversity if not sensitively located.
- Comment on *'Main Issue 12: Lakes and Waterways'*. Consider option 1 would have lesser effects on biodiversity and landscape as it concentrates impacts on specific agreed sites.

Further comments highlight climate change information (mitigation and adaptation) for future reference and should be included in subsequent LDP Environmental Reports.

<p>Gaelectric Developments Ltd (GDL)</p>	<p>[Letter of Peter Cunningham, Gaelectric Developments Ltd, dated 28<sup>th</sup> November 2016]</p> <p><i>Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices</i>  <i>Main Issue 8: Overarching Policy for Renewable Energy Development.</i></p> <ul style="list-style-type: none"> <li>• <i>Obj 17</i> – concerned with use of the phrase ‘imposing visual presence’ when describing wind farms as subjective and highly negative. Also, consider limit evidence of wind turbine development having a -ve impact on land quality and soil due to below ground work. Foundations are limited (less than 3.0m) and which benefit to land drainage.</li> <li>• General - Disagrees with the phrase taken from the SA interim report <i>“There is potential for negative effects in relation to unconventional oil and gas as well as mineral extraction whilst further mitigation measures will safeguard important landscapes from large scale wind farms”</i> (found at p6 and p18) and as considers it is unfair to include wind farms in this context and as they generate clean electricity and with minimal impact on surrounding environment in the construction and operation phases.</li> </ul>
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<b>Representation</b>	<b>Summary</b>
<p><b>LDP 0177</b> Dalradian Gold Limited</p>	<p>[Representations on behalf of Dalradian Gold Ltd, November 2016 – Turley]</p> <p>Overall Summary:</p> <ul style="list-style-type: none"> <li>• Areas of procedural or technical non-compliance with the EAPP Regulations; and/or the DP SA/SEA Practice note.</li> <li>• Failure of the SA to fully capture benefits of current and proposed future extraction activities (including gold reserves at Curraghinalt)</li> </ul> <p>The suggested effective remedy to these shortcomings is:</p> <ul style="list-style-type: none"> <li>• Identification of safeguarded land for mineral development</li> <li>• Reappraise the <i>reasonable alternatives</i> with the area of safeguarded land clearly identified</li> <li>• Re-consultation of a revised POP and Interim SA</li> </ul>

Detailed comments:

SA/SEA Scoping Report

Failure to consult prior to the publication of the LDP POP contrary to DP Practice Note 4 (figure 1), including consultation on the *Baseline Information* and structure of the document. Failure to follow 'best practice' to allow wider stakeholders such as members of the public to comment.

Considers that the baseline data does not accurately reflect the scale or potential benefit the minerals industry has on the local community (*Material Asset Baseline*).

*Section 5 of SA Scoping Report – Sustainability Issues.* 'Economy and Employment' section should recognise contribution that could result from responsible extraction of gold reserves and 'Material Assets' does not mention the substantial gold reserves.

*Section 6 of SA Scoping Report – Developing the SA Framework.* Objective 15 should be amended 'To minimise the production of waste and **adopt a sustainable approach to the** use of non-renewable materials'. Request an additional objective relating to gold and mineral reserves as follows: 'To utilise the substantial mineral assets of the district in a sustainable manner'.

SA of the POP

*Consultation and Transboundary consultations.* No evidence of Transboundary consultation as per the EAPP2004 and as advised by Development Practice Note 4. This therefore removes an opportunity for interested parties to influence.

*The development and assessment of reasonable alternatives.* For main issue 7 (Minerals Development) - Option 3. This is not sufficiently distinctive from option 2 to be a 'realistic alternative' and therefore is contrary to Regulation 11 of the EAPP NI 2004.

*Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices Main Issue 7: Minerals Development –*

Overall: - considers that the assessment fails to recognise the long-term socio-economic benefits arising from the construction and operation of a gold mine. This would increase +ve contributions for SA objectives 1, 2, 7, 18, 19, 20, 21.

Specific comments noted (and only where in disagreement with the Council's assessment):

- *Obj 1* – promotes that mineral extraction will have a greater than negligible impact on reducing poverty and social exclusion. Therefore Option 2 and 3 should be regarded as having a +ve impact.
- *Obj 2* - promotes that as mineral extraction will have a +ve impact on employment and wealth and therefore a correlating improvement on health and wellbeing. Therefore Option 2 and 3 should be regarded as having a +ve impact.
- *Obj 3* –greater benefit than recorded should be noted, and given commitments of mineral/gold mining sector to improving skills and training
- *Obj 4* – the substantial economic benefit associated with mineral/gold mining sector would have a +ve impact on home ownership and maintenance
- *Obj 7* – considers that option 2 and 3 should have a +ve impact as improved increased spending would generate the need for more services (such as shops)
- *Obj 12, 13 & 14* - not possible to accurately assess option 3 prior to identifying broad locations of safeguarded land.
- *Obj 16* – disagrees with the -ve impact of minimal extraction. In particular gold (once extracted) enters a circular economy and is thus recycled. This is different to hydrocarbon mineral extraction which are consumed.
- *Obj 18* – a greater +ve impact should be recorded given the substantial economic benefits associated with mineral extraction
- *Obj 19* – should be a +ve and as a large number of highly skilled and technical jobs will be created.
- *Obj 20* – option 2 and 3 should be recorded as +ve given the positive contribution through economic and social benefits would contribute towards sustainable economic regeneration
- *Obj 21* – strongly disagrees as there is the potential for significant investment should planning permission be granted to begin mineral extraction.

<p>Quarry Products Association Northern Ireland (QPANI)</p>	<p>[Representation on behalf of QRANI, November 2016 – Gordon Best, Regional Director QPANI]</p> <p><i>Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices Main Issue 7: Minerals Development.</i></p> <p>Specific comments noted (and only where in disagreement with the Council’s assessment):</p> <ul style="list-style-type: none"> <li>• <i>Obj 1</i> – should be a +ve. Given level of employment of aggregate and minerals industry in FODC.</li> <li>• <i>Obj 4</i> - should be a +ve. Supply of local construction materials keeps construction costs lower improving affordability at the local level.</li> <li>• <i>Obj 6</i> – should be more +ve. Given the role of the Aggregates and Minerals industry in supporting local communities and school.</li> <li>• <i>Obj 12</i> – should be a +ve. Highlights the overall positive contributions to biodiversity the Aggregates and Minerals industry (for example, habitat creation).</li> <li>• <i>Obj 14</i> – should be neutral (not –ve). Given the industry past record and commitment to mitigate the impact of development on historic environment and cultural assets including the commitment for pre-application investigations for archaeological remains</li> <li>• <i>Obj 16</i> - should be neutral (not –ve). Given difficulties in sourcing alternative materials.</li> <li>• <i>Obj 17</i> - should be neutral (not –ve). Given the reuse of overlying soils and clays, including as noise bunds/landscaping during extraction and as part of future restoration schemes.</li> <li>• <i>Obj 19</i> – should be a +ve. Given the extent of employment (including secondary employment) supported by the Aggregates and Minerals Industry coupled with training, apprenticeships etc.</li> <li>• <i>Obj 20</i> – request clarification. If ‘promote sustainable regeneration’ is specific to regeneration of the local area and community or local quarrying and minerals industry.</li> <li>• <i>Obj 22</i> – should be a +ve.</li> </ul> <p><i>Main Findings (p.89)</i> – given the above it is considered that the overall effect of mineral extraction is changed to a +VE.</p> <p><i>Comments and Mitigation (p.89)</i> - strongly contests this statement and given the track-record (at local, national and European level) of the quarrying industry has and will continue to offer and deliver on conserving and enhancing</p>
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	biodiversity, making a minimal impact on soil quality, landscape and protecting and enhancing archaeological heritage.
<b>LDP 0814</b> Anon	The SA Interim Report - Seems quite weak. Many of the decisions appear difficult to sustain.
<b>LDP 0838</b> Bryson Energy	Would like to see inclusion and emphasis of energy efficiency alongside that of renewable energy.