



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

FODC223

Local Development Plan 2030
Draft Plan Strategy
Addendum to Countryside Assessment

August 2020

APPENDIX 6: PROPOSED SPECIAL COUNTRYSIDE AREA REPORT

Justification of Boundary for Sperrin, Mullaghcarn, Cuilcagh & Islands Special Countryside Areas (SCA)

1.0 Introduction

- 1.1 In response to issues raised within representations made to the draft Plan Strategy further clarification has been provided within this updated report. Information has been drawn from referenced published documents such as the NILCA 2000 the Fermanagh and Omagh District Council Community and Action Plans as well as background studies and papers to Local Development Plan.

- 1.2 Designation of landscapes, and the identification of the qualities which make them special, informs their future management and stewardship, through planning policy and management plans, and promotes recognition of their social, economic and environmental value. Fermanagh and Omagh includes some of the most outstanding landscapes in Northern Ireland. The special qualities of our landscape is recognised through the national level designation of the Sperrin AONB, whilst others, such as the Islands of Lough Erne, Lough MacNea and Lough Melvin Special Countryside Area, are encompassed by local level designations.

- 1.3 In recognition of the landscapes of national importance within the Fermanagh and Omagh District designated as the Sperrin Area of Outstanding Natural Beauty, alongside what were the two proposed draft Erne and Cavelands AONBs in Fermanagh, the Council sought to examine the need for the use of the Special Countryside Area designation within the District. In this regard the Council sought to identify the landscapes within the District and particularly within these aforementioned highly scenic areas which exhibit exceptional landscapes, and within which it would be appropriate to limit development, in order to protect the quality of the landscape and unique amenity value.

- 1.4 In the preparation of the LDP draft Plan Strategy the value of the landscapes within the Fermanagh and Omagh District to local communities and tourists was apparent, with the vulnerability of these landscapes to change being identified as a key strategic issue. This was reinforced through the preparation of topic papers alongside the out-workings of public consultation events, workshops with Councillors and representations received in relation to the Preferred Options Paper. Fermanagh and Omagh District Council support the appropriate development within the countryside where there is the capacity for it to be absorbed. However, the Council also recognises that there are some landscapes within our District which are particularly sensitive to change and within which development should be precluded and allowed only on an exceptional basis.

- 1.5 This paper provides the background, rationale and methodology used to identify Special Countryside Areas (SCAs) in the Upper Sperrins, the slopes of Mullaghcarn, Upper Cuilcagh and the Islands of Upper and Lower Lough Erne, Upper and Lower Lough Macnean, and Lough Melvin.

2.0 Policy Context and Background

- 2.1 The Regional Development Strategy 2015 (RDS) recognises the importance of landscape quality towards identity, distinctiveness and character of an area. The requirement to conserve, protect and enhance designated areas and areas recognised for their landscape quality, is highlighted under the ‘natural environment’ section of the RDS¹. One of the central objectives of the RDS is the protection and enhancement of the environment through an approach to development and policy formulation, which has the condition of the environment as a central deciding factor.

- 2.2 Additional to the directive that the Strategic Planning Policy Statement² (SPPS) introduces the concept of an SCA. It states:

“Some areas of the countryside exhibit exceptional landscapes, such as mountains, lough shores and certain views or vistas, wherein the quality of the landscape and unique amenity value is such that development should only be permitted in exceptional circumstances. Where appropriate these areas should be designated as SCAs in Local Development Plans, and appropriate policies brought forward to ensure their protection from unnecessary and inappropriate development”

- 2.3 The Fermanagh and Omagh Community Plan process has so far developed key outcomes against a number of evidence-based priorities. One of these priority areas is the environment, with an outcome as follows:

“Our outstanding natural environment ... is sustainably managed and, where possible, enhanced”

The Community Plan Action Plan 2030 includes an action to bring forward an AONB Management Plan in conjunction with the adjoining AONB Councils, with other Working Groups collaborating on different workstreams as a result of the Future Search Conference. In addition the Council’s Tourism Development Strategy, Community Plan and Community Action Plan for the Council area identify the need to further develop and enhance the existing tourism product, infrastructure and visitor experiences to international standard within the Council, as well as seeking to address a plateau in tourism expenditure within the District at a time when the NI Tourism economy

¹ Natural Environment, pages 49-51, Regional Development Strategy – RDS 2035 – Building a Better Future.

² Strategic Planning Policy Statement for Northern Ireland, Department of the Environment, September 2017, para 6.75, page 55.

is steadily growing. In doing so it is recognised that there is a need to protect against inappropriate forms of development.

Outcome 5: Our economy is thriving, expanding and outward looking and Outcome 8: Our District is an attractive and accessible Place are particularly relevant. Action 8.4 of the Community Plan Action Plan seeks to develop and implement management plans for the Sperrin AONB and for the Global Geopark in partnership with neighbouring areas.

- 2.4 The Plan Strategy needs to take account of wider challenges, issues and opportunities affecting neighbouring areas. This includes those local authorities which contain part of the Sperrin AONB as well as those authorities in the Republic of Ireland with which Fermanagh and Omagh District Council Area share a border. A number of forums were established in this regard including the Sperrin and Cross Border Forums in addition to ongoing liaison with neighbouring authorities through meetings and formal consultation processes.
 - 2.5 Whilst there were a number of issues of common ground there was consensus on the need to protect our more sensitive landscapes from inappropriate development. Emphasis was also placed on the promotion of tourism assets such as scenic landscapes and the mutual benefit to neighbouring council areas which have a shared interest in protecting our landscapes.
 - 2.6 In pursuing an approach to conserve some of the most unspoiled and pristine areas of our countryside, the provision of SCA designation will serve to sustainably manage and conserve these areas from inappropriate pressures.
 - 2.7 Additionally, during the consultation process of our Preferred Options Paper (POP), NIEA Natural Environment Division (NED) stated that 'NIEA is in favour of the use of SCAs to protect sensitive landscapes which merit special protection.'
 - 2.8 The Landscape Character of Northern Ireland is described in the Northern Ireland Landscape Character Assessment which was undertaken in 1999 (NILCA 2000). The assessment describes the Northern Irish landscape through 130 landscape character areas (LCAs). 26 LCAs are wholly or in part within Fermanagh and Omagh. The character assessment describes the character of each area, its sensitivity, condition and provides principles for landscape management. More recently, information on the biodiversity and geodiversity of each LCA was added to the assessment, and these are available on the Northern Ireland Department for Agriculture, Environment and Rural Affairs websites, along with the character assessment.
- 3.0 Landscape Character Review for Fermanagh and Omagh**
- 3.1 As part of the evidence base for the Local Development Plan, and in response to representations received on the FODC Preferred Options Paper, the

Council commissioned a Landscape Character Review for Fermanagh and Omagh in order to provide a more detailed record to reinforce the strategic direction of the Local Development Plan. This review had a number of objectives, not least to identify any significant change in the landscape that has taken place since NILCA 2000 was carried out, and to reappraise landscape sensitivities and forces for landscape change based on the updated assessment and to provide revised landscape management guidelines based on the reassessment of sensitivities and forces for change.

- 3.2 The review provides an overarching summary of the District with the following pertaining to those parts of the District within which SCAs are proposed.
- 3.3 Fermanagh and Omagh is an inland landscape, albeit at its closest no more than 7km from the west coast of Ireland. There is great diversity in the landscape, from the wild upland landscapes of the Sperrins to the north, the scenic 'lakelands' of Fermanagh, and karst limestone uplands which are unique to Northern Ireland.
- 3.4 To the south west of the District are the 'Fermanagh Cavelands', a landscape of distinctive sandstone and limestone uplands including important landscape features such as Cuilcagh Mountain, the Cliffs of Magho, dramatic escarpments and other karst features resulting from other underlying limestone geology. The landscape is sparsely settled and valued for its scenic qualities and recreational value, and includes the UNESCO Marble Arch Caves Global Geopark.
- 3.5 To the north east of the 'cavelands', Upper and Lower Lough Erne lie within shallow and expansive lowland Lough basins, set within drumlin farmland of the river Erne Valley extending in an arc from County Cavan to the south east and Donegal to the north west. Enniskillen occupies a commanding position between the two loughs. This low-lying landscape is juxtaposed with the dramatic features of the more upland landscape to the west, including the Cliffs of Magho, adding to its scenic value. The area is important for recreation and tourism.
- 3.6 To the north of Omagh the landscape changes dramatically, with the lowland farmland and sandstone plateaus giving way to more pronounced hill summits including Bessy Bell and Mullaghcarn which mark the gateway to the wilder and more dramatic upland landscape of the Sperrins, comprising a series of ridges separating lowland valleys aligned east to west, and extending northwards into neighbouring Strabane. Much of this landscape is included within the Sperrin Area of Outstanding Natural Beauty in recognition of its nationally important scenic value.
- 3.7 The Landscape Character Review and Landscape Designation Review for Fermanagh and Omagh helped to refine the approach to the identification of proposed SCAs. Notably the Landscape Character Review states that the extent of land designated is a matter for a Local Authority, although Local Authorities with a high proportion of their area designated by others (e.g.

AONB) should consider carefully the purpose and extent of their local landscape designations, examining also the relationship between the local landscape designation and other national and local designations. This reflects the approach the Fermanagh and Omagh Council took in identifying proposed SCAs.

4.0 Methodology

- 4.1 Having established through background papers Landscape Character Assessment and Development Pressure Analysis with their associated appendices (December 2015), NILCA 2000 and the Landscape Character Review (Sept 2018) alongside discussions with our consultants in relation to their findings throughout the process of completing the review, representations to the Preferred Options Paper and knowledge of those landscapes which are a draw to tourists, the LDP Team sought to define those general areas of the District considered to be of high scenic value and worthy of protection from development with a view to designation as an SCA within the draft Plan Strategy.
- 4.2 The initial draft of the proposed SCA boundaries were the out-workings of a desktop exercise primarily using the most up to date orthophotography. This orthophotography provided detailed imagery of the landscapes as an evidential base to supplement existing local knowledge of the landscape and was utilised for an initial desktop-based study, undertaken in the autumn of 2017, to determine the broad areas, within the Sperrin AONB and the draft AONBs within Fermanagh, for inclusion in a SCA designation.
- 4.3 The NILCA 2000 was used as a reference point, along with planning application data, GIS work studying large-scale line layers (including height contours) from Ordnance Survey, and a review of the most up to date orthophotography (2017). Third party data from Northern Ireland Environment Agency (NIEA) in relation to international, national and local designations was incorporated into this exercise.
- 4.4 NILCA 2000 was considered in data in respect of the specifics of the relevant LCA and neighbouring LCAs, where the proposed boundary of the SCA fell close-by. Detail of planning permissions were overlaid to ensure that the lands to be included within the SCA did not have an extant planning permission which could potentially change the unspoilt character or impact on the scenic quality of the SCA. A review of the most up-to-date orthophotography provided a point-in-time snapshot of the condition of the landscape which was to be then verified on site.
- 4.5 Following this, preliminary boundary lines were determined, and lines digitized onto GIS. Three broad areas for inclusion as proposed SCAs were then considered by the LDP Steering Group in January 2018. The three potential areas considered to merit a SCA designation were:

- the upper parts of the Sperrins
- the upper parts of Cuilcagh Mountain; and
- the Islands of Lough Erne.

It was noted at the time that further refinement of the proposed SCAs would be required so that they were limited to pristine and unspoiled areas of the district. Therefore further desktop work was carried out in June/July 2018 in line with the following methodology:

- the CORINE³ land cover maps were reviewed to identify broad areas for inclusion in the proposed SCAs;
- building polygons were plotted on GIS. This was with a view, as far as possible, of excluding dwellings and buildings from the SCAs;
- a more detailed review of orthophotography was subsequently undertaken to amend the SCA boundaries to align with physical features such as: natural boundaries, field boundaries, streams and the edges of travel routes in the absence of natural boundaries; and
- cultivated land was avoided where possible as was infrastructure such as roads and other man-made features.

4.5 Whilst separated physically from the main upper Sperrin SCA designation, an additional area around Mullaghcarn was identified as being largely pristine and of a similar nature to the high Sperrins area. This area, providing a backdrop to the settlement of Omagh, is distinct from the farmland in the lower slopes.

4.6 This work resulted in further refinement of the proposed SCA boundaries which enabled field work, to verify the boundaries identified, to be progressed. The results of this fieldwork, including any changes made to the boundaries, are detailed in section 4.0.

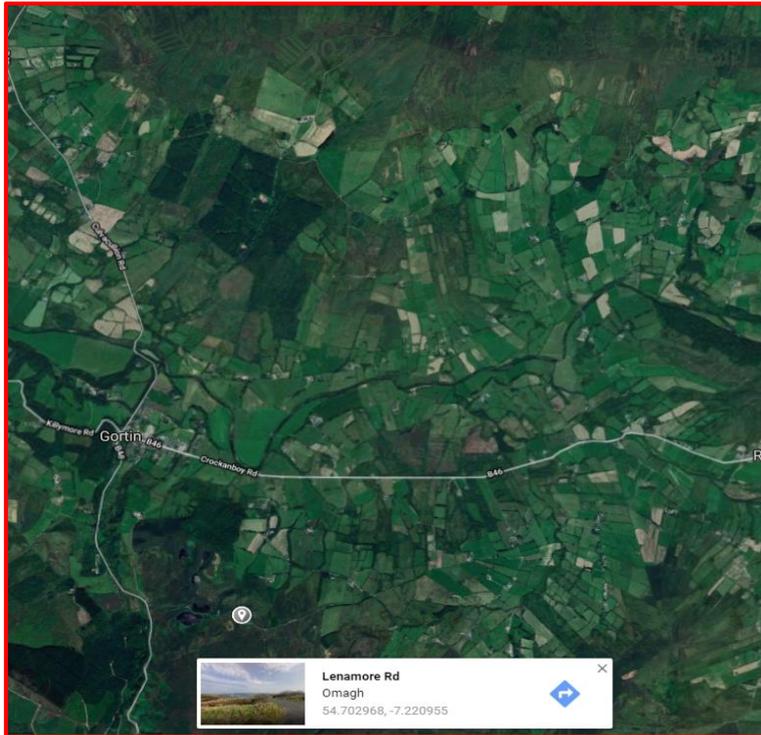
5.0 Summary of Fieldwork

5.1 Visual inspections of the proposed SCA designations were made to appraise the draft boundaries. Various critical viewpoints from within and without the proposed SCAs and the perimeter of the boundary itself, were visited. These critical views provide broad open views of the proposed SCA from the public road and from other public areas such as picnic areas. It should be noted that whilst this report references critical views, an appreciation and consideration of the landscape character and quality is apparent from the local road network.

³ The Corine Land Cover (Coordination of Information on the Environment Land Cover, CLC) refers to a European programme that established a computerised inventory on land cover of the 27 EC member states and other European countries. It is based on the results of a satellite imaging programme undertaken jointly by the Joint Research Centre of the European Commission and the EEA.

Sperrin and Mullaghcarn Proposed SCA

- 5.2 The Sperrin and Mullaghcarn proposed SCAs fall into LCA 24 South Sperrin and LCA 26 Bessy Bell and Gortin, respectively. Both of these LCAs are categorised as Upland Hills and Valleys Landscape Type.
- 5.3 It is notable that the Landscape Description for LCA 24 South Sperrin within the Landscape Character Review identifies the broad upland ridges of the Sperrins as forming a backdrop to the valley landscapes which provide for views and vistas. It references the change in character and pattern within the landscape when moving from valley floor to the upper moorland slopes and that the upland landscape has qualities of wildness, remoteness and tranquillity. The northern slopes of Mullaghcarn fall into an ASSI designation. There are long, scenic views available from upland areas with few intrusive man-made features.
- 5.4 LCA 26 Bessy Bell and Gortin references the imposing, simple upland landscape of Mullaghcarn as contrasting with the Strule Valley. Mullaghcarn is noted to be a scenic, accessible landscape with dramatic, mountainous appearance and distinct, sharp ridges and rocky summits. The review distinguishes between the upper slopes of Mullaghcarn which are littered with grey scree and carved by steep, fast-flowing burns and the lower slopes where stone walls and earth banks follow historic townland boundaries.
- 5.5 As with all LCAs the review of the landscape character details Landscape Sensitivity and Managing Landscape Change.
- 5.6 The proposed Sperrin and Mullaghcarn SCAs, whilst separate and distinct from each other, largely encompass upland areas of hills and mountains, peatland, moors and heath and uncultivated grasslands. The wild character on the large scale, broad, rounded ridge tops and in the upper valley reaches is readily apparent. The open mountain edges enclose and form prominent skylines above the river valleys from which agricultural fields then transition to mountain terrain. In the most part the land included in the proposed SCA boundaries is above the 200m contour line, however there are some exceptions.
- 5.7 The view of the Owenreagh and Owenkillew valleys extending eastwards from Gortin village, is prominent from the viewpoint east of the Gortin lakes (see Photomap 1 below).



Photomap 1 – Marker showing critical viewpoint

- 5.8 From this point (photograph 1 below) the western-most parts of the proposed Sperrin SCA are clearly visible, as lower elevation rounded hills, but with clearly untouched or pristine landscape intact above the growing line. The boundary has avoided the cultivated pastures, though some of these do encroach extremely high upon the slopes close to the hill summits, and this has been reflected in our defined SCA line (as a revision from the desktop exercise). This is not typical however and they do appear as the infrequent exception. Some examples are visible in photographs 1- 5 below.
- 5.9 Photograph 1 below shows the westernmost boundary of the Sperrin SCA.



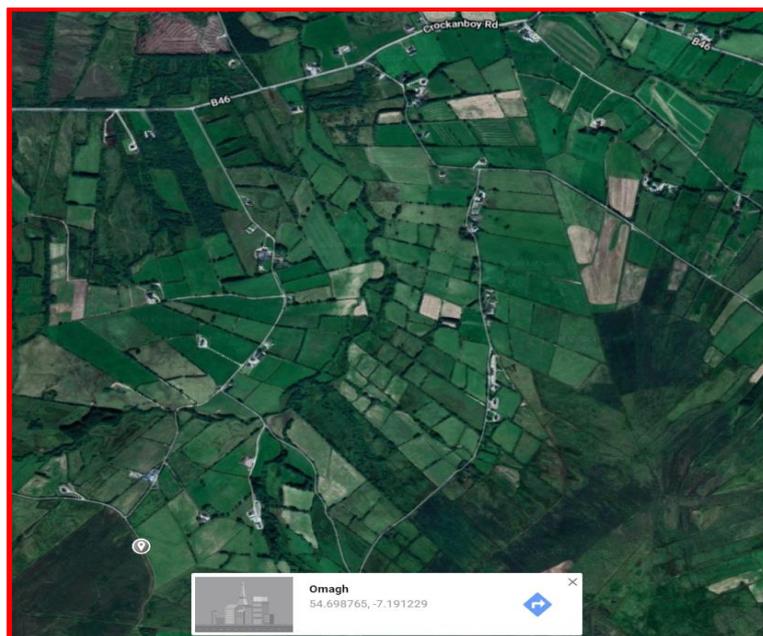
Photograph 1 looking north from Gortin Lakes.

5.10 Photograph 2 shows a zoomed view of the same viewpoint. From here there is a good perspective with which to judge the negative impact of a solitary wind turbine which is situated just outside our district to the north of Gortin. This one turbine has a negative impact across a wide area of the valley in which it is situated and beyond, even at lower elevations. However, the SCA has not been altered to exclude the turbine given it is the sole example and it is of a temporary nature.



Photograph 2

5.11 Photomap 2 below details the area of the landscape visible from the viewpoint further eastwards from Gortin Lakes.

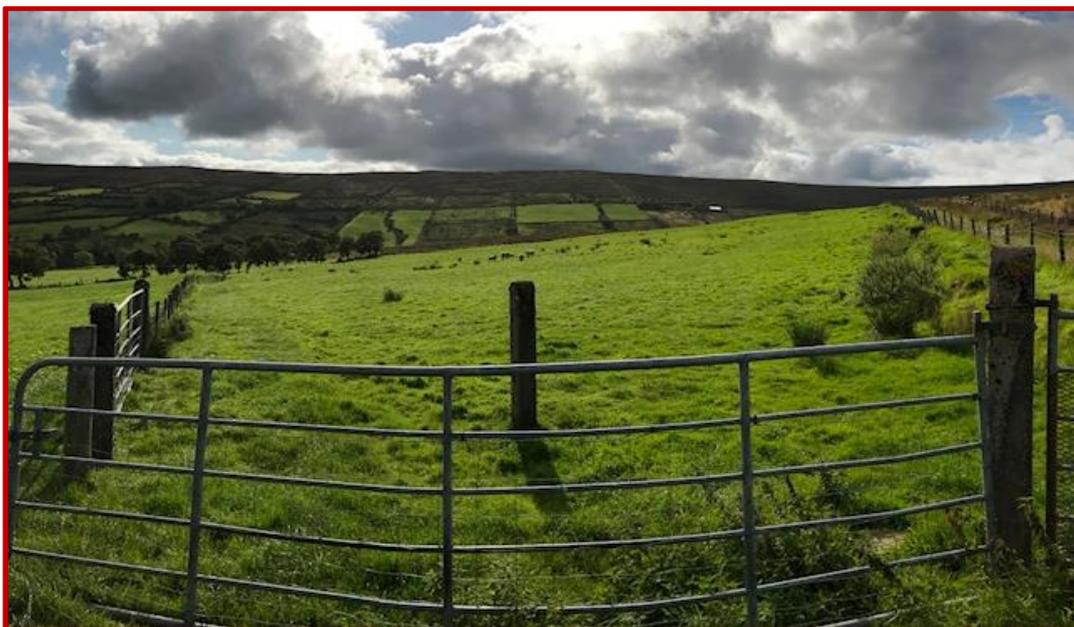


Photomap 2

- 5.12 From this location, the distant higher Sperrins are visible in the north east. Mullaghcarn slopes are closer and are visible in the right of photograph 3 below. Photograph 4 (also below) shows a closer view of the Mullaghcarn lower slopes, and the proposed SCA line has clearly included the darker pristine heathland whilst excluding the lower pastures.



Photograph 3



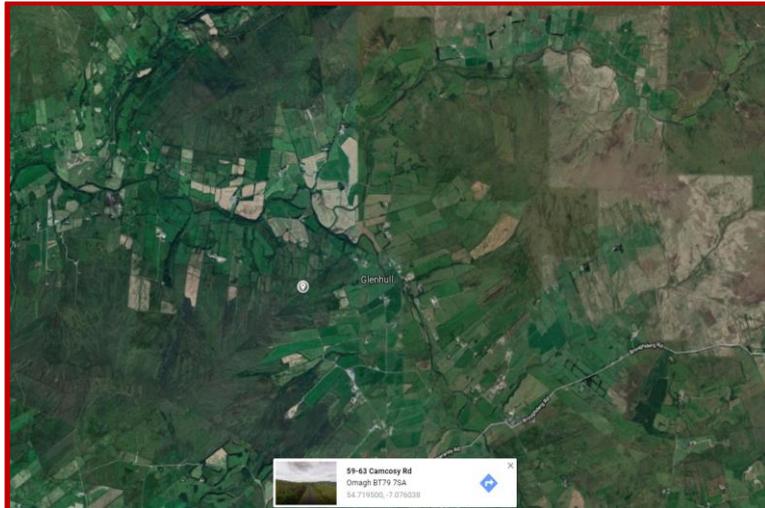
Photograph 4

- 5.13 These images highlight the untouched nature of the uplands, even in the extremities of the Sperrins region. At the next stop along, high upon Mullydoo Road, the critical view is not of the Sperrins, though it does provide a viewpoint from which to appraise the extent of the proposed Mullaghcarn SCA (See photograph 5 below). Note the solitary wind turbine to the left of the image.



Photograph 5

- 5.14 Whilst the proposed SCA boundary is not as easy to ascertain at this distance, it still clearly does include land generally of a pristine condition. In the north-west of the proposed boundary, the effect of elevation is such that it tends to blend in eventually with pasture and cultivated land and meet human development. The darker areas, as evidenced in photograph 5, are clearly pristine and untouched, and the SCA boundary here is therefore appropriate, as is the nature of the boundary extending south-eastwards. Where the proposed boundary meets lower height elevations, it has tended to terminate at these points.
- 5.15 Of note is that the hill from which photograph 5 was taken (Crocknamoghil at 325m elevation) is itself prominent though it has been criss-crossed with numerous lines of infrastructure, and what would seem to be drilling test sites. Temporary infrastructure in the form of a caravan and a camp site, with mobile homes and other infrastructure, align the northern boundaries and beyond the summit, largely out of view.
- 5.16 A further viewpoint for this appraisal of the proposed SCA, along the route through the Sperrins, is indicated in photomap 3 below. This location is at the southern slopes of the Owenkillew valley adjacent to Glenhull.



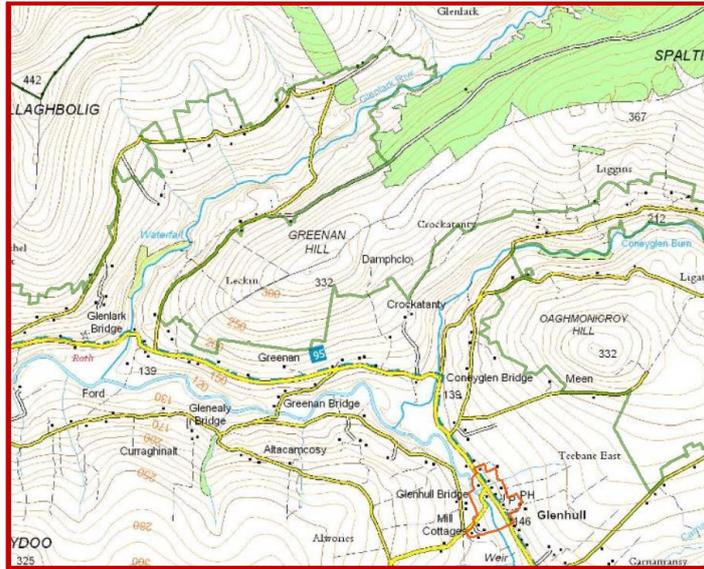
Photomap 3

From this viewpoint, (photograph 6) one is looking towards the slopes which form a peninsula within the proposed SCA, which is intersected by smaller valleys running linearly, north eastwards away from Owenkillew.



Photograph 6

- 5.17 From this viewpoint, the distinctive inverted 'V' shape of the field pattern extending high on the slopes of Greenan Hill in the centre of this image, reaches an elevation of over 300m. The two images below (map and photograph 7) show this area in focus and how it corresponds on the map, with the boundary line of the proposed SCA.



Photograph 7

- 5.18 In instances such as these it was considered appropriate to extend the proposed SCA line to include these pastures given the elevation they extend to and relationship to the remainder of the SCA.

Cuilcagh Proposed SCA

- 5.19 The Landscape Character Review of Fermanagh and Omagh identifies LCA 9 Cuilcagh and Marlbank as containing the only true mountain within the District – Cuilcagh at 685m – and has some of the most dramatic countryside in the District. It is a landscape rich in historic interest, dramatic scenery, caves and botanical interest.
- 5.20 There is limited intervisibility of the boundary in relation to the land when travelling along Marlbank Road, even though this is close to the boundary of the SCA. This is due to the undulating upland nature of the land, which falls from sight towards the south, away from the road, and in other places rises before falling once more. Therefore, and partly due to the lack of infrastructure, the area is enclosed and out of sight. From the vantage point on Gortmaconnell Rock, much more of the proposed SCA boundary line is visible as is more of the boundary when viewed from a distance. What can be ascertained on a field visit, is that generally the boundary has avoided infrastructure and development and improved pastures. Some inclusions are unavoidable due to the relief and terrain and it makes sense to include pastures which extend to extremely high elevations, especially where these join up with the higher reaches of the mountains and the rest of the proposed

SCA.



Photograph 8

- 5.21 Photograph 8 above shows Gortmaconnell Rock, rising away from the Marlbank Road, which is within the proposed AoHSV. The proposed SCA boundary is not immediately visible due to landforms such as this, undulating throughout the landscape locally.
- 5.22 From atop of Gortmaconnell (Photograph 9 below), there are extensive views of the locality and from where the SCA boundary line is clearly visible and discernible.



Photograph 9

- 5.23 An area of planted forest appears beside the SCA boundary, east of the junction of Marlbank Road and Marble Arch Road. This is all part of the boundary of the National Trust's Florence Court estate nearby. The SCA has been slightly amended to exclude this site.
- 5.24 Further south, on Carran Road, another good view of the proposed SCA boundary is visible, including where it meets Benaughlin Mountain. In photograph 10 (below) the mostly pristine southern slopes of Benaughlin are visible. There does however seem to be a farm nestled into the valley, and therefore the SCA boundary at the desktop stage has been amended to

exclude the farmhouse. This is due to the elevated nature of the land here and visibility, against a backdrop of unspoiled landscape.



Photograph 10

- 5.25 The remainder of the proposed SCA at this part of the district seems sympathetic to avoiding development and artificial infrastructure. There would be a high confidence level in stating that the proposed boundary avoids improved pastures, man-made features and buildings, structures etc., in so far as reasonably practicable. Some minor roads, tracks and trails do exist within the proposed SCA however these are minimal. There are utility features such as electricity and telephone lines present and the Cuilcagh boardwalk does bisect the SCA, though these features do not look overly incongruous in the landscape.



Photograph 11

- 5.26 Photograph 11 (above) shows the view from atop Carran Road, looking west towards the ridge at Cuilcagh, showing the general nature of the land to be bogland and generally of a pristine, unspoiled nature. The overwhelming majority of the Cuilcagh SCA is elevated land and exhibits the unspoiled nature of a landscape that has not been interfered with by human development.

The Islands SCA

- 5.27 The relevant LCAs are 2a Lower Lough Erne (North), 2b Lower Lough Erne (South), 5 Lough Macnean and 11 Upper Lough Erne. These are all categorised as Lough Basin Landscape Type.
- 5.28 In this context, the islands refer to the element of the Countryside Policy Area defined originally in the Fermanagh Area Plan 2007, under Policy Nat Env 2; Countryside Policy Areas (CPAs). In this policy, the shores and islands of Upper and Lower Lough Erne, the shores and islands of upper and Lower Lough Macnean and the shores and islands of Lough Melvin were defined as CPAs.
- 5.29 Following publication of PPS21 Sustainable Development in the Countryside, the preamble advised that the policy provisions of this PPS will take precedence over the policy provisions for Green Belts and Countryside Policy Areas contained in existing statutory and published draft development plans but cited a number of exceptions which would change in title to “Special Countryside Areas” (SCAs). Amongst these exceptions is the Islands CPA as identified in the Fermanagh Area Plan 2007.
- 5.30 Interpretation of this is that the SCA refers to only to the islands part of the Shores and Islands CPAs designated under FAP Policy Nat Env 2. A Planning Appeal Commission decision in March 2010, reference [2009/A0002](#) affirms this interpretation. Furthermore, a footnote in the Area Plan policy, Nat Env 2, stated that ‘Those islands which have a road connection to the shore are treated as part of the mainland’.
- 5.31 Thus, protection in the form of SCA designation is only extended to the islands of the loughs named above, and this is interpreted to mean inclusion of islands unconnected by causeways or roads to the actual mainland. This has required an extensive examination by aerial photography to determine whether road connections to the islands are present, prior to including them within the SCA. A revised digitised version of the Islands SCA has therefore been created which excludes the islands, regardless of size, which are connected to the mainland by road.