

FODC231



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

FERMANAGH AND OMAGH DISTRICT COUNCIL

Position Paper 15

Development Pressure Analysis

December 2015

Development Pressure Analysis of Fermanagh and Omagh District Council

Purpose: To provide members with a Development Pressure Analysis for Fermanagh and Omagh Council, to identify those areas where significant development pressure has occurred and/or where local rural character is under threat.

Content: The paper provides information on:-

- (i) The Development Pressure Analysis for Fermanagh and Omagh District, and the key findings;**
- (ii) Areas within the district which have experienced significant development pressure due to individual ‘single dwelling’ planning applications, and also wind energy applications.**
- (iii) Development pressures in the context of the environmental designations and landscape character areas within the district**
- (iv) A resultant overview of the effect on what could be termed as ‘vulnerable landscapes’ as a result of this study.**

1.0 Introduction

- 1.1 This Development Pressure Analysis is one of the four strands of the Countryside Assessment, which includes Settlement Appraisals, Environmental Assets, and Landscape Character Assessment.
- 1.2 This Development Pressure Analysis, seeks to identify areas where significant development pressure has occurred and/or where local rural character is under threat of significant change. To carry out this analysis, typically involves looking at the distribution of single rural dwellings in the countryside. Additionally, wind energy applications are also examined, since these types of application have been increasingly prevalent in recent years and have the ability to have a significant visual impact upon the rural countryside area, and thus have a cumulative impact upon the issues to be considered as part of the aforementioned strands of the Countryside Assessment.
- 1.3 Development categories other than single dwellings and wind energy, can have an impact upon the visual amenity and character of our countryside area, and these activities can include agriculture, mineral extraction and industrial type development. These types of development are widely acknowledged to be sufficiently controlled by prevailing regional policy. Additionally, any emerging policy which may be brought forward by the Local Development Plan will tailor any local guidance to manage what is considered to be ‘unsatisfactory development’ which has an adverse impact on rural character.

- 1.4 The value of the pressure analysis will be primarily in assisting to identify areas of exceptional landscape (for example, parts of the AONB) and to help to identify areas of landscape that are particularly vulnerable to any development and which are of high scenic value with the view to designating them as Special Countryside Areas which may need a stronger rural policy approach in regard to new development.
- 1.5 'The countryside' as referred to in this paper, is defined as the land outside of the designated settlements (as defined in the existing Fermanagh Area Plan and Omagh Area Plan) and focuses upon single dwelling applications in this area, as well as the wind energy development proposals.

2.0 Regional Planning Policy

- 2.1 The Strategic Planning Policy Statement for Northern Ireland (SPPS) places Sustainable Development at the heart of the planning system. The SPPS sets out the need to protect and enhance the built and natural environment, including landscape character. The SPPS states that our environment must be managed in a sustainable manner in accordance with the Northern Ireland Executive's commitment to preserve and improve the built and natural environment and halt the loss of biodiversity.
- 2.2 The SPPS directs that policy approaches to new development in the countryside should reflect differences within the region, be sensitive to local needs and be sensitive to environmental issues including the ability of settlements and landscapes to absorb development. In doing so this may involve recognising areas that are particularly sensitive to change and areas which have lower sensitivities and thus provide opportunities to accommodate sustainable development. All proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings, including the natural topography, and to meet other planning policy and environmental considerations, including the policy approach to cluster, consolidate and group new development with existing established buildings, and must not have an adverse impact on the rural character of the area.

3.0 Data Provision

- 3.1 The data used to inform the pressure analysis has been provided by the Department of the Environment (DoE). All residential planning applications in the countryside with the exception of minor alterations and extensions from April 2004 to March 2015 were identified by DoE's Analytical Services Branch and results are compiled in tables with relevant percentages calculated (Table 1 and Chart 2). This is effectively a seamless 11 year period from which the patterns of distribution of applications can be assessed. For example, it is useful to examine the extent of development which has occurred in recent

years in the run-up to and aftermath of, the introduction of PPS 21 in June 2010.

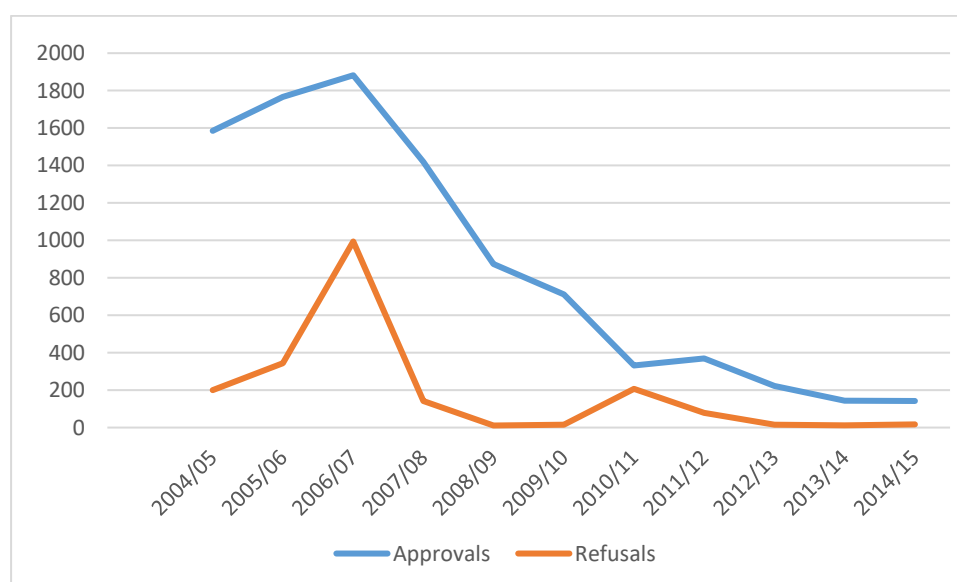
- 3.2 Applications for single dwellings in the countryside have been mapped and those on the same site are shown as one dot and provide an indication of development pressures in the countryside (see Map 1). Appeal information is not included within the statistics.

Table 1: Planning Decisions for Rural New Single Dwellings (Full, Outline & Reserved Matters) in FODC Area (2004 to 2015)

Financial Year	Approvals	Refusals	Total
2004/05	1585	200	1785
2005/06	1767	343	2110
2006/07	1882	994	2876
2007/08	1420	142	1562
2008/09	874	11	885
2009/10	711	15	726
2010/11	332	206	538
2011/12	369	78	447
2012/13	223	15	238
2013/14	143	12	155
2014/15	142	17	159
TOTAL	9448	2033	11,481

Source: DoE Analytical Services

Chart 1: Planning Decisions issued for Rural New Single Dwellings (Full, Outline & Reserved Matters) in Council Area (2004-5 to 2014-15 financial years)



Source: Figures from DoE

4.0 Summary of Analysis

- 4.1 Chart 1 illustrates the number of planning decisions issued for rural new single dwellings. The accelerated increase during the period 2005/06 to 2007/08 is clearly evident. This reflects the high increase in planning applications submitted prior to the introduction of draft PPS 14 in March 2006.
- 4.2 This increase may be attributed to several reasons, including the increasing trend of people desiring to live in the countryside and the selling off of land by farmers for individual houses. It was also likely fuelled by public fears that a tightening of controls in the countryside was imminent. The number of planning decisions remained high into 2008/09, but have since declined with a noticeably small percentage of refusals and an almost 100% approval rate across the Council area. It should be noted that decisions on almost 500 applications were held pending the publication of the final version of PPS 21 (June 2010). These all had to be reassessed against the policy provisions of PPS 21. Whilst the majority of planning decisions for single dwellings prior to 2006 were outline, the majority of those post-2006 were mainly Full and Reserved Matters applications.
- 4.3 If the number of planning applications in rural areas had continued at the pre-2006/07 levels, and had been accompanied by correspondingly high building rates, a point would have been reached whereby unsustainable patterns of development in the countryside would have threatened its value as a regional asset by damaging landscape, biodiversity and natural habitats. The introduction of PPS 21 sought to strike a balance between the need to protect the environment while simultaneously sustaining a strong and vibrant rural community. It should be noted that the policy provisions of PPS 21 provide a range of different categories of residential development including dwellings on farms, replacement dwellings, dwellings in existing clusters etc. The provision of permitting one dwelling per farm every 10 years could yield 4,969 dwellings based on the current number of farms in the district (DARD Agricultural Census, 2014). This is an average of some 500 dwellings per year across the council area.
- 4.4 Overall, the number of approvals has steadily declined since 2010 and in the last three years (2012-2015) during which time PPS 21 has 'bedded in' the average number approved per year in Fermanagh and Omagh has been significantly lower, with an average of 169 approvals per year. If this trend were to continue, 2,535 approvals would issue in a fifteen year period.
- 4.5 Map 1 (Appendix 1) shows the distribution of planning decisions for single dwellings in the rural area, cross referenced against 10km grid squares distributed throughout the council area. Each square details the number of applications found within each, and serves as a rudimentary measure of decision distribution. It thus provides a general indication of those areas which are under pressure and those that have little development. For example, the central square portion of the council area, stretching from Kesh in the north-west to Seskinore in the east, and as far south as Brookeborough in the south east and the countryside adjacent to Enniskillen in the south west, shows

almost uniformly high pressure of development. These lower lying lands, close to the main road networks (arterial routes) between the two main towns of Omagh and Enniskillen, are more popular locations for development.

- 4.6 Map 2 (Appendix 1) is a statistical analysis of 'hot spots' generated by ArcGIS, which has determined whether the clustering of decisions is statistically significant or not. Where there is a very high incidence of clustering (i.e. the 99% confidence measure) these appear as the darkest red colour on the map. Strong, but decreasing confidence measures of 95% and 90% are also included as diminishing hues of red/orange. Lastly, where there is deemed to be much less statistical significance of clustering, this is shown as the lightest coloured cells on the map.

Locations of Development Pressure

- 4.7 From this statistical analysis, pressure areas visibly exist in concentrations. Noticeably large concentrations exist in:
- (i) A particularly large area to west of Clanabogan (south west of Omagh town);
 - (ii) Countryside area between Derrygonnelly and Monea;
 - (iii) Area north east of Belleek near Lower Lough Erne shore, beyond the DRC of Mulleek;
 - (iv) Between Lisbellaw and Maguiresbridge;
 - (v) A pocket of countryside north east of Lisnaskea, in proximity of the Dispersed Rural Community (DRC) of Knocks;
 - (vi) A linear portion of land north and east of Ballinamallard, (part of which is in the vicinity of Coa DRC).

Map 2 clearly demonstrates the distribution of these pressure areas.

- 4.8 From Maps 1 and 2, it is clear there are obvious pressures around the Dromore, Fintona, Seskinore and Tattyreagh areas. There is also visible pressure around Carrickmore, Loughmacrory and Drumnakilly. Remote hill areas such as the Sperrins, the fringes of Omagh district to the east, south of Fintona and particularly the North West around Drumquin, show lower levels of distribution.
- 4.9 Other significant pressure areas appear around Lisnaskea, Brookeborough, Enniskillen and Irvinestown, with the main development pressures close to the arterial routes. This area would appear to have very dense frequencies of applications and may be due to the accessibility of this region to the main settlements and to suitable local topography. The Loughs play a part in determining where development is concentrated throughout the council area. Policy areas have resisted overdevelopment of housing near to the Loughs in the past however some of these areas are still very attractive for development and have drawn large amounts of pressure, as can be evidenced from the small pockets of decision clusters on the shores of Lower Lough Erne particularly. By and large, development pressure appears to have been minimised by the Countryside Policy Area (CPA) surrounding Upper and

Lower Lough Erne, as defined by the Fermanagh Area Plan 2007 (FAP). The Islands portion of the CPA is now defined as a Special Countryside Area (SCA).

- 4.10 Conversely, large open areas of countryside exist with very little development pressure, and these often correlate to high/inaccessible terrain and/or environmentally sensitive areas (See Map No's 3 & 4). Whilst it is evident that topographical constraints and environmental designations (such as AONB for instance) have had their part to play in the distribution of single rural dwelling applications, there are still pockets of relatively higher development pressure within these areas. One example of this is the main road between Gortin and Greencastle – the Crockanboy Road - (which lies wholly within the AONB) which shows a linear pressure of development, corresponding with the most suitable areas for development in this otherwise exposed, upland terrain.
- 4.11 Map No. 3, would seem to indicate that by and large, development pressure is much less within areas which benefit from environmental designations, and the only exception appears to be the AONB. It is not a coincidence that many of the protected areas are unconducive to development, for reasons of topography, or land conditions (such as blanket bog) or; generally being remote in nature.
- 4.12 Furthermore, as can be seen from Map 5, it is recognised that some types of landscapes, for example lowland drumlin, have a greater ability to absorb development than others such as upland or mountain landscapes. In this regard, the landscape assessment as provided by the Northern Ireland Landscape Character Assessment (NILCA) series will, in conjunction with the pressure analysis, help to identify areas of landscape that are particularly vulnerable to any development and which are of high scenic value with the view to designating them as Special Countryside Areas. A draft Northern Ireland Regional Landscape Character Assessment for Northern Ireland has recently completed a consultation period.

5.0 Wind Energy Decisions

- 5.1 A ten year period of data in relation to single wind turbines and wind farms, similar to the period of time used for single dwelling decisions, was assessed to demonstrate the distribution of this particular type of proposal which has potential for a particular visual impact, both individual and cumulative, within the countryside of Fermanagh and Omagh District Council.
- 5.2 Ambitious government targets, reflected in the Programme for Government 2011-2015, require Northern Ireland to seek to achieve 40% of its electricity consumption from renewable resources and a 10% renewable heat by 2020. Electricity generated from onshore wind farms has been identified as the most established, large-scale renewable source in Northern Ireland and the main source to achieving this target.
- 5.3 A recent consultation paper was issued by the Department of Enterprise, Trade and Investment (DETI) on the Closure of the Northern Ireland

Renewables Obligation to new onshore wind in 2016. The impact of the closure of the Renewable Obligation Certification payments is likely to have a negative impact on the Renewable Energy sector in Northern Ireland and will bring about an overall reduction in the number of planning applications for Wind Energy Development.

Table 2: Applications received for single wind turbines and wind farms broken down by legacy council area and financial years 2004/05 to 2014/15.

Financial Year	Single Wind Turbines		Wind Farm		Total
	<i>Fermanagh</i>	<i>Omagh</i>	<i>Fermanagh</i>	<i>Omagh</i>	
2004/05	4	6	1	4	15
2005/06	4	10	2	6	22
2006/07	5	13	1	5	24
2007/08	4	5	2	1	12
2008/09	10	10	2	2	24
2009/10	5	9	0	1	15
2010/11	22	51	0	1	74
2011/12	67	71	0	1	139
2012/13	77	84	0	2	163
2013/14	45	50	0	0	95
2014/15	11	5	0	2	18
Total	254	314	8	25	601

Source: DoE Planning 2015. *Proposals for wind farms are for more than 2 wind turbines.

- 5.4 Statistics are available online from DoE Analytical Services Branch, detailing the locations and type of wind energy approved across Northern Ireland each year in quarterly release format. Consideration of the figures for applications received in Table 2 below against the overall number of single wind turbine and wind farms approved across the district (Table 3) demonstrates both the large increase in the number of applications received as well as the promotive nature of PPS18 in terms of the number of applications being approved. The distribution of approved applications are detailed in Map 4.

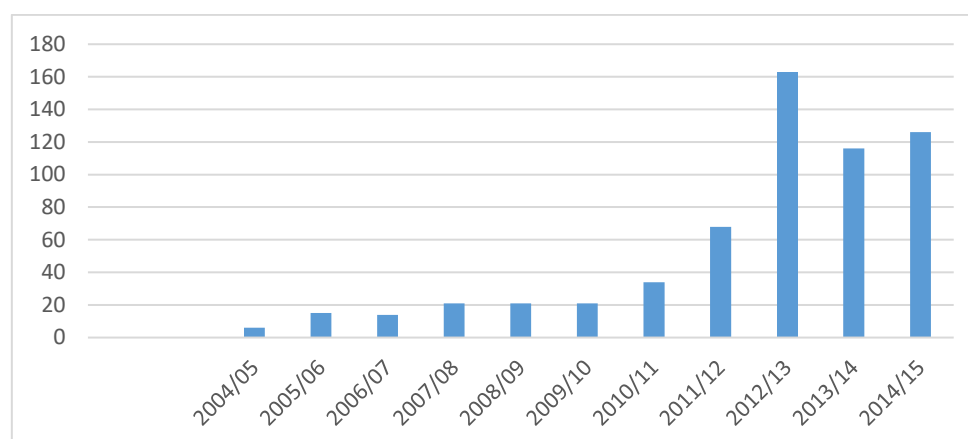
Table 3: All Planning Decisions issued for single turbines and wind farms (combined) in Council Area (2004-2015)

Financial Year	Approvals	Refusals	Total	Allowed on Appeal
2004/05	6	0	6	
2005/06	15	0	15	
2006/07	12	2	14	
2007/08	18	3	21	
2008/09	20	1	21	
2009/10	11	10	21	
2010/11	25	9	34	2
2011/12	50	18	68	
2012/13	155	8	163	6
2013/14	104	12	116	1
2014/15	103	23	126	
TOTAL	524	81	605	9

Source: DoE Planning 2015

- 5.5 The particularly large increase in the number of planning decisions for single wind turbines from 2012/13 onwards could be attributed to a drive by the DOE to prioritise decisions on all renewable energy applications.
- 5.6 The chart above clearly shows the aforementioned steady level of decisions for wind energy from the financial year 2004/05 leading up until 2011/12, after which, numbers dramatically increased for the remainder of the period.

Chart 2: All Planning Decisions issued for single turbines and wind farms (combined) in Council Area (2004-2015)



Source: DoE 2015

- 5.7 Whilst there were quite a number of approvals for wind energy in the council area, there is a lack of information regarding how many have been implemented. It should be noted that a number of historic planning permissions may have lapsed, and will no longer be eligible to be enacted unless previously commenced.

Distribution of wind energy decisions

- 5.8 Throughout Fermanagh and Omagh district council area there are a number of variations in the distribution of wind energy (Map 4). There is a visibly higher concentration of wind energy development in the legacy Omagh Council area and to a slightly lesser extent in the northern portion of Fermanagh. In contrast, the remainder of Fermanagh has a low concentration of wind energy development. This applies equally to single wind turbines and to wind farms. There is a greater concentration of single wind turbines in the Omagh area than in Fermanagh.
- 5.9 There is a fairly even spread of single wind turbines throughout the Omagh high lands and low lands. The wind farms are more often associated with land above 200m in elevation (for example Pigeon Top, Bessy Bell) in the historic Omagh DC area. In the historic Fermanagh DC area wind farms are generally less prevalent however they are usually associated with higher land along the south western boundary of the district council.

- 5.10 The presence of the AONB in the north east of the council area, and international environmental designations throughout the council area generally, have influenced wind energy distribution (Maps 3, 4 & 5).
- 5.11 Accessibility and forestry plantations may have been a further limiting factor in the distribution of wind energy development. The impact of forest plantations, particularly in relation to wind farms, is evident in Fermanagh (Map 4).
- 5.12 Ongoing issues with grid connection, in particular the delay in timescales for receipt of quotes for connection to the electricity grid and the high cost of connecting to the grid has resulted in many projects becoming unfeasible.

6.0 Key Findings within the Context of the Northern Ireland Landscape Character Areas (NILCA's)

- 6.1 This section examines areas of development pressures within the context of the Northern Ireland Landscape Character Areas (LCAs), drawing from information provided in the Landscape Character Assessment Paper (Paper 14).
- 6.2 The low lying central region of the council district is broadly speaking more capable of absorbing development pressure due to the occurrence of drumlin features in the landscape. This is reflected by both the high level of historic planning decisions in this area and the ability of the landscape to accommodate further development. In addition it is also linked to its central location between the two main towns and greater accessibility to the main transport corridors, the A32 and the A4.
- 6.3 This central area includes the LCA of 'Irvinestown farmland' and 'Omagh farmland' with development pressure evident in Map 5. The statistical analysis also illustrates the cluster of pressure areas to a high degree of statistical confidence.
- 6.4 However other areas which are less accessible to the main transport corridors have also witnessed exceptionally high pressure. An example is The Sillees Valley LCA which lies west of Lower Lough Erne. This area has experienced extremely high pressure in the last 10 years, as can be seen from the attached maps. This is in contrast to neighbouring LCAs, such as The Lough Navar and Ballintempo Uplands LCA and the Enniskillen LCA, which have experienced less development pressure as a likely result of the existing topography and SCA designation.
- 6.5 Other contrasts exist in areas such as the Carrickmore Hills LCA, which, although it is an area of uplands, has experienced very high pressure.

NILCA's which are 'sensitive to change' as identified by the Landscape Character Assessment (Paper 14)

- 6.6 The following 12 Northern Ireland Landscape Character Areas (NILCA's) are described in the Landscape Assessment Paper as being vulnerable to change (See map 5):
- Garrison Lowland LCA 1;
 - Lower Lough Erne LCA 2;
 - Croagh and Garvary River LCA 3;
 - Lough Navar and Ballintempo Upland LCA 4;
 - Lough Macnean Valley LCA 5;
 - Knockmore Scarpland LCA 6;
 - Cuilcagh and Marlbank LCA 9;
 - Upper Lough Erne LCA 11;
 - Enniskillen LCA 13;
 - Clogher Valley Lowlands LCA 17;
 - South Sperrin LCA 24;
 - Bessy Bell and Gortin LCA 26;
- 6.7 From the pressure analysis studies, it is clear that the development pressure from single rural dwellings within the vulnerable LCA's is generally at a low level. However, there are exceptions to this, for example, the Lattone Road between Garrison and Belcoo/Holywell (Lough Navar and Ballintempo Upland LCA 4 and Lough Macnean Valley LCA 5) which exhibits a linear pressure along much of its length, possibly due to the fact that the steep slopes and forest confine the surrounding land.
- 6.8 There are some clusters of high pressure close to the Lower Lough Erne shore, east of Belleek and another one close to Boa Island (Map 2). These fall within LCA 3 Croagh and Garvary River and LCA 2 Lower Lough Erne, which are two of the LCAs identified in the Landscape Assessment as being vulnerable to change.
- 6.9 There is an area of pressure to the east of the Strule Valley in LCA 26 Bessy Bell and Gortin which correspond generally with the hinterlands of Tircur, Dunmullan, Knockmoyle and Gortnagarn. Clogher Valley Lowlands LCA has experienced quite a high level of development pressure with a hot spot/cluster of development pressure in the Lisbellaw/Maguire'sbridge area (Map 2). Map 2 also shows a lower level of clustering throughout much the remainder of the Clogher Valley Lowlands (LCA15) whilst much of that appears to centre around the main road network. Similarly in the South Sperrin and Beaghmore Moors and Marsh LCAs the main road from Gortin, through Rousky, to Greencastle has also experienced pressure.
- 6.10 The remainder of the LCAs (see paper 14 for more details) are classed as being of 'medium to low' or 'low' sensitivity to change. This correlates with the fact that the predominant development pressure for single dwellings occur within these LCAs (Map 5).

- 6.11 It is important to note the identification of landscape with a reduced capacity to absorb development does not preclude appropriate forms of development within those areas.
- 6.12 The geographical spread of wind energy development across District in the context of the LCAs is illustrated in Map 5. The majority of wind farms are located in the northern portion of the Fermanagh and Omagh area with only 4 wind farms located within the identified vulnerable LCAs Lough Navar (1) and Ballintempo Uplands, Knockmore Scarpland (2) and in Bessy Bell and Gortin LCA (1).
- 6.13 The LCAs identified as having a medium or lower sensitivity to change experiencing most pressure from wind farm development are Lough Braden, Beaghmore Moores and Marsh, Carrickmore Hills, Slievemore and Brougher Mountain.
- 6.14 Overall those landscapes which have been identified as being vulnerable have not experienced a significant amount of development pressure from wind energy development. Both wind farms and single wind turbines have the potential to individually, as well as cumulatively, significantly impact on the character of all landscapes, particularly those deemed to be vulnerable to change.
- 6.15 Given the increasing prevalence of wind energy development, in particular wind farms, and increasing concerns regarding impacts on more sensitive areas, consideration should be given as to whether the local development plan should bring forward a policy on how proposals of this nature, size and scale should be addressed.
- 6.16 In addition, all Ramsar sites and European designated sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)) are considered in Paper 14 as being vulnerable to change (Map 3).

7.0 Conclusion and Recommendation

- 7.1 It is evident from the available statistics that the rate of rural housing approvals under PPS 21 is notably reduced when compared to approvals under historical rural planning policies. Furthermore, since its final adoption in June 2010, having had a chance to 'bed in', the rate of rural approvals has reduced by a third. Overall, the development pressure analysis shows little evidence of significant pressure across the district and that apart from some exceptions, rural character has been maintained.
- 7.2 Whilst the number of decisions in relation to wind energy development have increased over recent years there has been a general downward trend in the number of wind energy applications being received. This downward trend

may be linked to uncertainties over network infrastructure, operating incentives and the costs of installing this technology all of which are beyond the control of planning policy.

- 7.3 A broad overview of the development pressure from both single rural dwellings and wind energy development indicates that in general the areas within the district that are valued for their high scenic value or natural heritage importance such as the Sperrin AONB have experienced less pressure for development.
- 7.4 Policy formulation should reflect differences in the area including the ability of landscapes to absorb development and striking a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities in order to be consistent with the RDS and the SPPS.
- 7.5 It is therefore recommended that:
- This paper is taken into account when formulating countryside planning policies;
 - The paper be sent to NIEA for consideration as it forms part of the Countryside Assessment;
 - The development pressure analysis is part of the Countryside Assessment and as such it is part of the Sustainability Appraisal which incorporates the Strategic Environmental Assessment (SEA) and should be taken into account when formulating the LDP.

Map 1: 10km gridsquares and corresponding number of single rural dwelling decisions* across Council area from 2004 to 2015

*Baseline data supplied by DOE

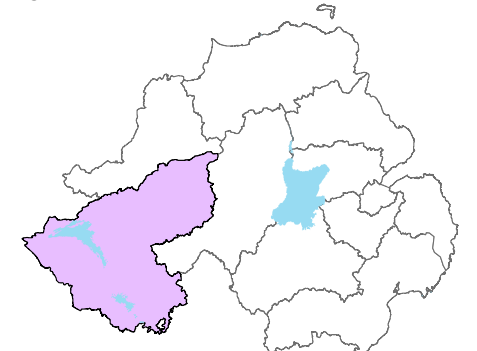
- Planning Decision (single rural dwellings)
 - 10km Grid Square
- With corresponding number of decisions given in corner or adjacent to grid cell



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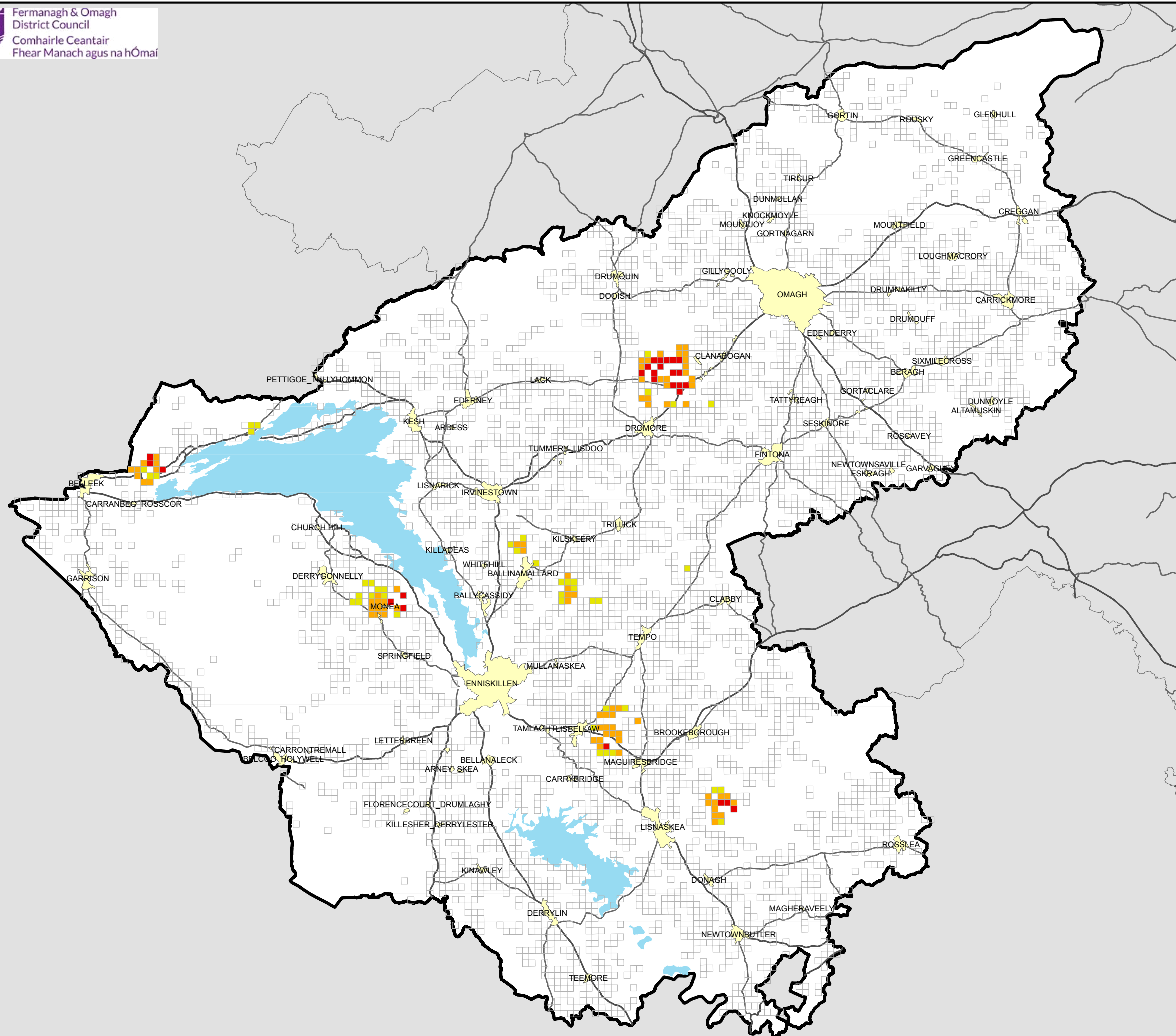
Regional Context



Map 2: Rural Hot Spot statistical analysis using ArcMAP GIS based on single rural dwelling decisions

Legend

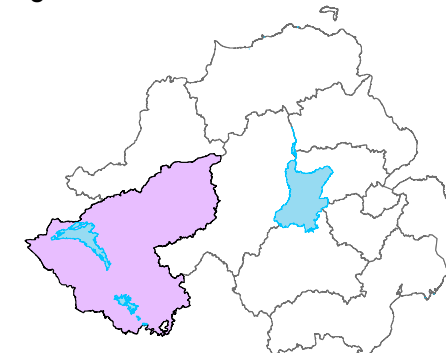
- Hot Spot with 90% Confidence
- Hot Spot with 95% Confidence
- Hot Spot with 99% Confidence
- Not Significant



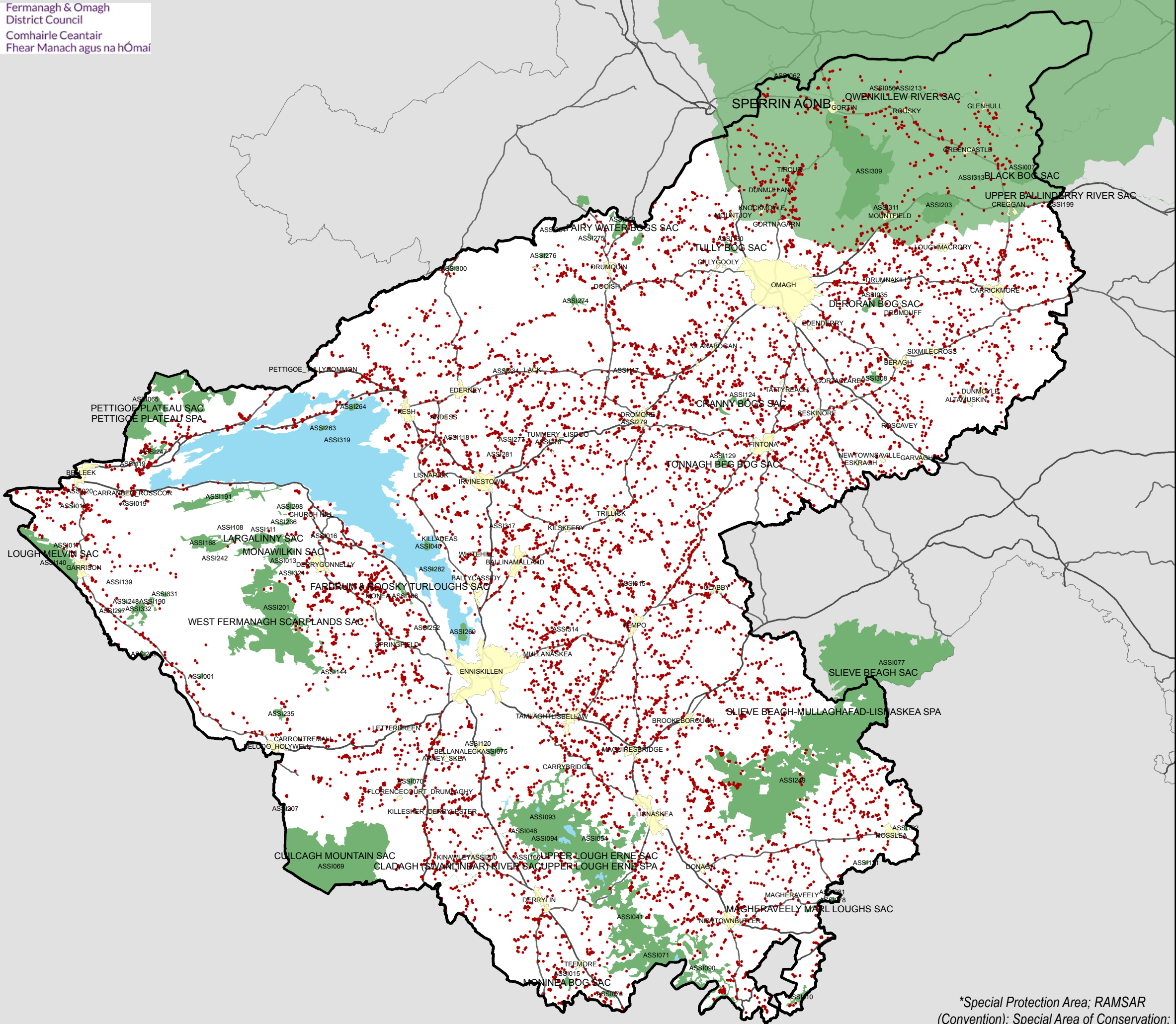
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Regional Context



Map 3: Environmental Designations



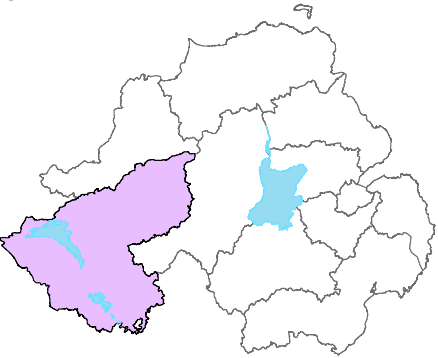
- Includes SPA;
RAMSAR; SAC;
ASSI; AONB *
- Settlements
- Road Network (A & B Class)
- Planning Decision
(single rural dwellings)

N

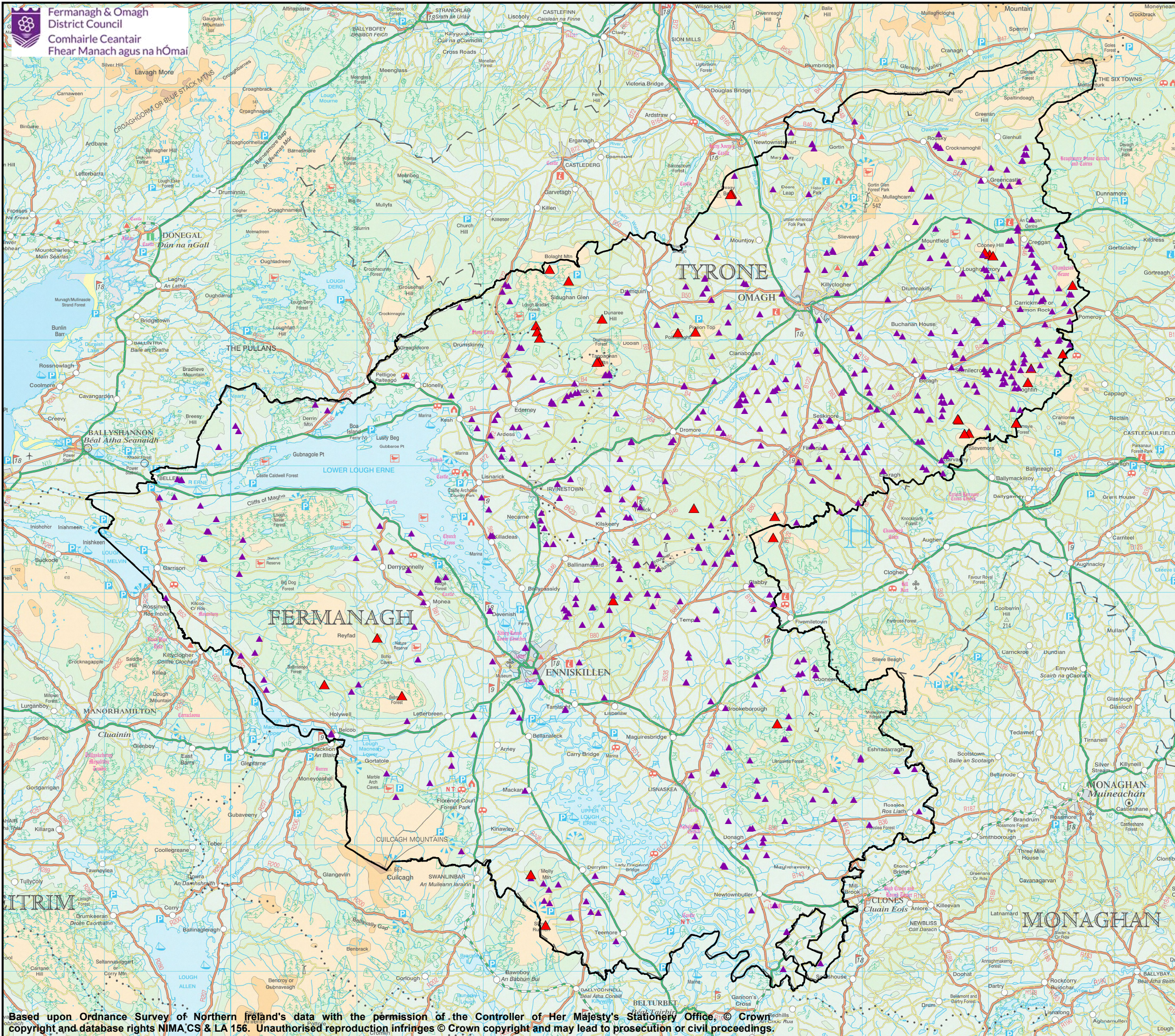
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Regional Context



*Special Protection Area; RAMSAR
(Convention); Special Area of Conservation;
Area of Special Scientific Interest;
Area of Outstanding Natural Beauty



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Map 4: Wind Energy Decisions distribution (2004/05 to 2014/15)

Legend

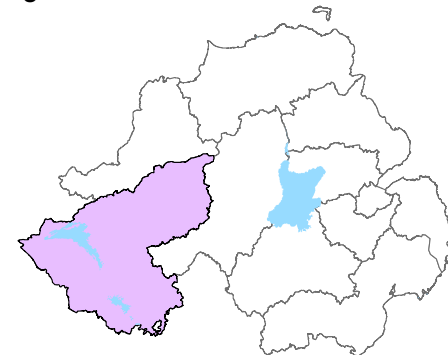
- ▲ Wind farm
- ▲ Single wind turbine



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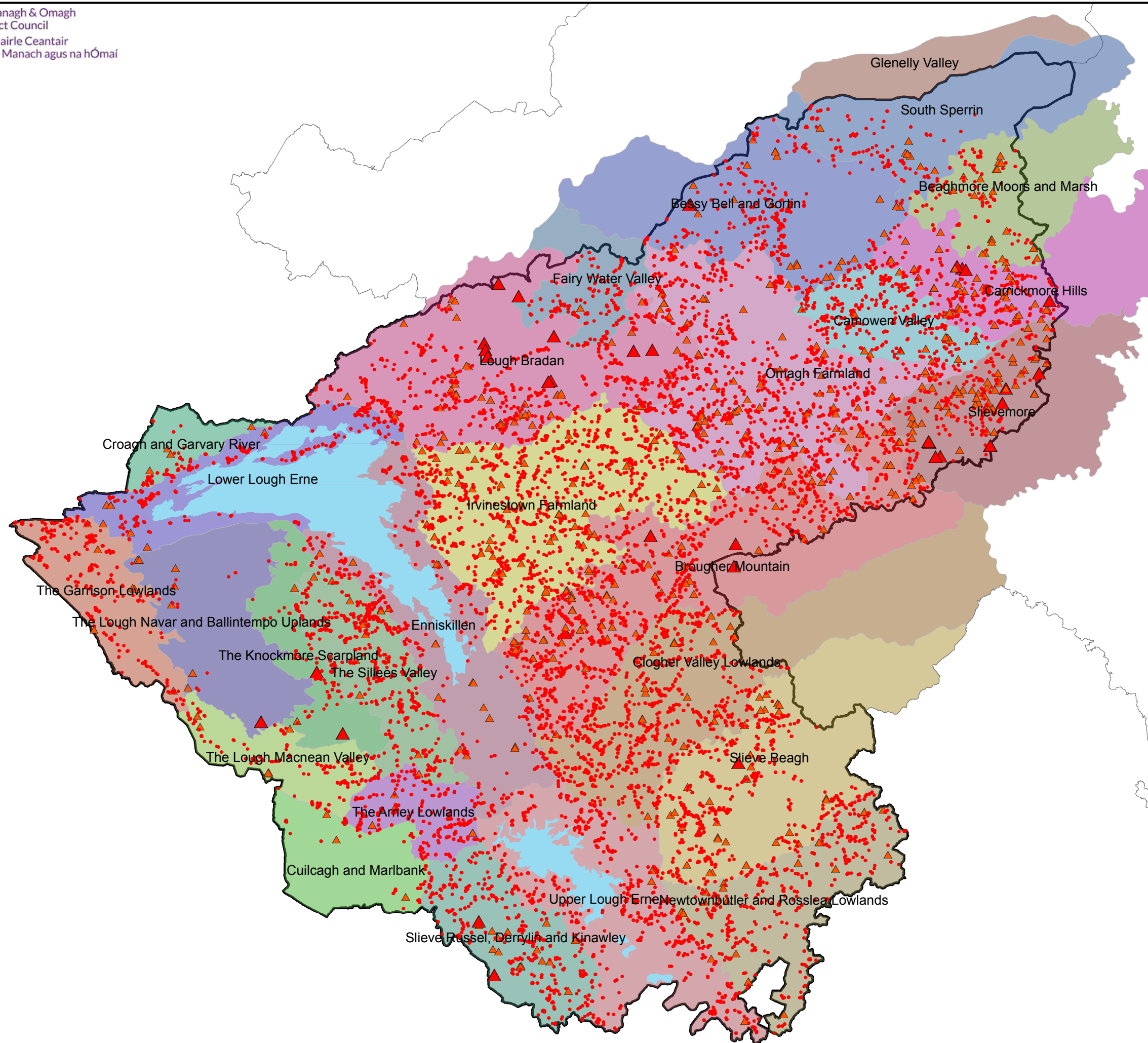
Miles

Regional Context



NIMA CS & LA156. Development Plan Section, Planning, Fermanagh & Omagh District Council.

Map 5: Pressure Analysis in relation to LCA Single Dwellings and Wind Energy (all types)



Legend

- Single dwelling decisions (2004-2015)
- ▲ Wind farm
- ▲ Single wind turbine
- Fermanagh and Omagh District Council

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Regional Context

