



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

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Fermanagh and Omagh District Council  
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Date: 19 December 2018

Dear Hilda,

### **Local Development Plan 2030: Draft Plan Strategy - Statutory Consultation.**

I write with reference to the above subject and further to your recent consultation in accordance with the requirements of Regulation 15 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

Mid Ulster District Council welcome this consultation and look forward to working with you as we continue to progress our respective local development plans. As you are aware we have discussed a number of cross boundary issues and areas of common ground as part of the Sperrins and Cross Border Forums and this response has been structured around those areas of common ground.

### **Fermanagh and Omagh Draft Plan Strategy**

#### Meeting Peoples Needs/Accommodating Growth

The draft Strategy has laid out FODC's position in relation to future growth as one which will focus primarily on growing the hub settlements of Omagh and Enniskillen. The Strategy states that 47% of new housing will be accommodated in the two hub towns, primarily through existing commitments. In relation to economic growth, the Strategy will allocate 90 Hectares of industrial land across the 2 hub towns and the 5 local towns. Of this 90 hectares, 80% will be located within the two hub towns of Omagh and Enniskillen.

There will also be opportunities for development in villages and small settlements which will sustain their role as focal points for the surrounding area, whilst development in the countryside will also be facilitated in order to sustain existing rural communities.

We are supportive of this growth strategy as it is in line with the RDS and also in keeping with the shared common issues discussed at the Sperrins Forum and the Cross Border Forum i.e. that the main focus of growth should be within the hubs.

With reference to retail development, we support the town centre first approach adopted by FODC and the sequential test which will be adopted for any out of town centre retail development. This is in line with strategic policy and in keeping with the shared common issues discussed at the Sperrins Forum.

#### Road Linkages and Transport Infrastructure

The FODC draft Strategy has committed to support the improvement of the transportation network where it will lead to a reduction in travel time. In conjunction with this, the Strategy also recognises the importance of creating accessible town centres through the retention of car parking and the integration of transport and land use. The strategy also recognises that whilst in town centres, infrastructure for walking and cycling is not yet adequate, it supports the protection of disused transport routes as potential sources of active travel which can be used for walking and cycling.

We support this approach which recognises that the building of transport infrastructure is outside of the Council's sphere of influence, yet still supports such proposals as they would bring about a reduction in travel times, something which will benefit all residents including those of, and those travelling from, adjoining council areas.

We recognise that whilst it is important to promote more sustainable modes of transport such as walking and cycling, in rural districts such as Fermanagh and Omagh as well as in Mid Ulster, it is also important to improve the experience of the private car user and to focus on protecting existing road infrastructure and supporting improvement to that infrastructure, as a means to achieving this.

#### Protection of Sensitive Landscapes

We note the position of FODC's draft Plan Strategy Vision which states that;  
*The quality of the landscape, geodiversity and biodiversity including areas such as the Sperrin AONB, the Marble Arch Caves, UNESCO Global Geopark and Lough Erne will (be) maintained and managed.* We are supportive of this commitment to uphold the character of the most vulnerable landscapes including the Sperrin AONB which is a shared environmental asset across both of our districts.

We also note the provisions of Policy LO2 which states that within a Special Countryside Area (SCA), development will not be permitted unless in a limited set of criteria. We note the location of SCA designations at Cuilcagh Mountain, the high Sperrins and the islands of Lough Erne, Lough Macnean and Lough Melvin. We support the designation of SCA's and the associated policy, which is in line with the SPSPS. The location of such a designation in the high Sperrins is of particular interest to MUDC as it is a significant shared environmental asset.

A key aspect of protecting our most sensitive landscapes is in the context of the impacts of wind energy development and other high structures. We note the contents



of Policy RE01 and the associated Wind Energy Strategy, with particular attention being paid to the capacity of the Sperrins and Slieve Beagh which are the main shared environmental assets between our two districts.

We welcome the designation of the northern most part of the South Sperrin LCA as an “area of no underlying capacity” according to the Wind Energy Map Viewer and the corresponding clarification in the Wind Energy Strategy which states that such landscapes are *“landscapes which, due to their sensitive characteristics and value, can accommodate only the smallest scale of wind energy development, or none at all.”* However, with that in mind, we would query the text in respect of the South Sperrin LCA at Page 298 of the draft Plan Strategy which states that *“the character of parts of the upland landscape would support larger scale wind energy development.”*

### Mineral Development

We note that one of the Plan objectives states a desire to *“sustainably manage and safeguard where appropriate our natural resources including minerals.”* We are supportive of this general approach to minerals development which is in keeping with SPPS and recognises the necessity of continuing to enable mineral development whilst still endeavouring to protect our vulnerable landscapes and environmental assets.

We also support the decision of FODC to introduce Areas of Constraint on Mineral Development. These designations are in keeping with both the SPPS and aligns with the discussions of the Sperrins and Cross Border Forums to provide policy to protect areas from mineral development because of their intrinsic landscape, amenity, scientific or heritage value. We note the designation of ACMD's across both Slieve Beagh and the Sperrins and recognise that these are important shared environmental assets.

We also note the contents of Policy MIN 01 which states that commercial peat extraction will not be permitted. This policy provision is supported and is in keeping with the SPPS and aligns with the discussions of the Sperrins and Cross Border Forums to provide appropriate policies to afford appropriate protection to our existing peat resources from commercial peat extraction.

With specific regard to Mineral Safeguarding Areas, we support the approach of protecting these areas from surface development which would prejudice their future exploitation. This will facilitate a sustainable approach to mineral development where minerals which are important to the local economy will be capable of being developed in order to facilitate economic growth.

### Tourism

We note the tourism strategy of FODC which is to protect unspoilt upland areas such as the Sperrins and Cuilcagh Mountain as well as protecting existing tourism assets and to direct tourist accommodation development toward the settlements and in particular to the main hubs of Enniskillen and Omagh. Within the countryside there will be scope for major tourist development which will be of exceptional benefit to the tourism industry as well as development which is in association with existing tourism

assets. We support the commitment in the Tourism Strategy to protect the unspoilt upland area of the Sperrins AONB from tourism development as this area is an important shared environmental asset.

We support the provision in policy for major tourism development where it will have an exceptional benefit to local tourism industry as such development may also stimulate the tourism industry in neighbouring districts as well.

#### Open Space

We welcome the provision within the draft Plan Strategy for protection of river corridors. Rivers by their nature are assets which are shared across various council boundaries and are important areas of recreation and often have significant visual importance. River banks form a continuous green link across the countryside as well as providing access to the water for enjoyment and participation in water based activities. For these reasons we are supportive of the efforts to protect river banks from development which would compromise the quality of the river or its banks or indeed the potential for it be enjoyed as an area of open space as well as its importance as a natural habitat and important source of biodiversity.

We also support the approach in the draft Strategy to protect the Ulster Canal from development which would prejudice its future restoration. This is a shared issue which has been discussed as part of the Cross Border and Sperrins Forums.

#### Improvement of Broadband Provision

We note and support the approach of the draft Strategy to telecommunications development which seeks to *"facilitate telecommunications growth.....whilst keeping the impact on the environment to a minimum."* The operational policies also encourage the options of site sharing to be explored before new equipment or new sites will be permitted. The Strategy also introduces a policy for future development requiring that developments of a certain size provide service ducting to enable future connection to be as easy as possible.

We are broadly supportive of this approach as it is in line with the SPPS and will encourage improved broadband throughout the district which, like Mid Ulster is rural in nature and as such suffers from poorer telecommunications capability than more urban parts of Northern Ireland.

We note that the Wind Strategy has identified areas where the landscape has no capacity to accommodate turbines and with this in mind it may be appropriate to consider whether that landscape has the capacity to accommodate other high structures.

Although it is too early in the process to say with certainty given that our Draft Plan Strategy has not yet been published, we are of the opinion that your Draft Plan Strategy is not in conflict with Mid Ulster's position in relation to cross boundary issues and that it has regard to our plan as a neighbouring council.



Should you wish to discuss this please do not hesitate to contact me directly.

Yours sincerely,



**Sinead McEvoy**  
**Principal Planning Officer – Head of Development Plan**

**On behalf of Dr Chris Boomer, Planning Manager**