

developmentplan@fermanaghmagh.com

Date: 19th December 2018

Tel: 028 7034 7244

Dear Ms Clements,

Re: FODC Local Development Plan: Draft Plan Strategy – Public Consultation.

I write on behalf of Causeway Coast and Glens Borough Council and in response to the publication of your LDP: Draft Plan Strategy for public comment on Thursday 25th October 2018.

Whilst FODC is not an 'adjoining council' for the purposes of formal consultation, the Sperrin AONB traverses both of our administrative boundaries (as well as those of Derry City and Strabane and Mid Ulster District Council areas). As such, it is important that the Council is aware of, and makes comment (if deemed necessary) on the draft policies that relate to this particular AONB.

The Council is also aware that, due to the cross boundary nature of the Sperrin AONB designation, two key tests of 'soundness' (as set out at Appendix 3 of the Planning Appeals Commission guidance 'Procedures for Independent Examination of Local Development Plans') are as follows:

Consistency tests

C4: Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1: The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

Cross Boundary Sperrins Forum

The Sperrins Forum, convened in April 2017, consists of both elected representatives and professional planning officers from the following councils:

- Causeway Coast and Glens Borough;
- Derry City and Strabane District;
- Mid Ulster District; and

- Fermanagh and Omagh District.

The Forum was primarily set up to ensure a high level of co-operation and communication among neighbouring councils as we prepare our Local Development Plans (LDPs). It addresses the following common issues:

- Protection of landscapes and environmental assets through appropriate environmental designations;
- Management of Minerals Development;
- Improvement of road linkages and infrastructure;
- Sustainable tourism development; and
- Meeting peoples' needs.

The relevant councils will continue to work together throughout their respective LDP preparations to facilitate collaborative working and to ensure that the tests of 'soundness' are met.

Draft Plan Strategy

FODC Draft Plan Strategy references to the Sperrin AONB and 'Sensitive Locations or Features' (of which the AONB is one), including CC&GBC comments, are detailed at Appendix 1 (attached).

The Draft Plan Strategy Sustainability Appraisal (inc. SEA) references to the Sperrin AONB, including CC&GBC comments are detailed at Appendix 2 (attached).

Landscape Wind Energy Capacity Study

The Council acknowledges the very detailed wind energy capacity study that has been carried out and how its findings have informed FODC's approach to how wind energy proposals should be considered. The Council also acknowledges Draft Policy RE01 Renewable and Low Carbon Energy Generation, including the reference to the guidance set out at Appendix 7 (page 248) of the Draft Plan Strategy.

Landscape Character Review

The Council acknowledges the landscape character review carried out for the FODC area.

Landscape Designation Review

The Council acknowledges the landscape designation review carried out for the FODC area.

Minerals Development

Whilst the Council acknowledges that FODC will identify areas of economic or conservation value when more robust evidence is made available to them it does note a proposed 'blanket' Area of Constraint on Minerals Development (ACMD) which covers the whole area of the Sperrin AONB located within FOCD administrative boundaries.

We looking forward to the continuation of our collaborative work on issues affecting the Sperrin AONB as we progress our respective Plan preparations.

Yours faithfully,



Denise Dickson
Head of Planning

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Appendix 1

Table 1: Draft Plan Strategy references to Sperrin AONB and ‘Sensitive Locations or Features’ (of which the AONB is one):

TEXT				
Page	Paragraph	Topic	Detail	CC&GBC Comment
18	3.6 & 3.7	Working with other Local Authorities	FODC’s Draft Plan Strategy acknowledges that their district contains part of the Sperrin AONB which is shared with other councils, including Causeway Coast and Glens Borough Council.	Collaborative working (Cross Boundary Forum) between all 4 councils with an interest in the Sperrin AONB, is ongoing.
18	3.7	Working with other Local Authorities	“The emerging Plan Strategy must ensure through its planning policies and joint working with the respective councils, a consistency of approach to development within areas where there are shared boundaries. Cross-boundary working through forums such as the Sperrin Forum and Cross border Forum set up by Mid Ulster District Council has taken place during the preparation of the draft Plan Strategy. Members of these forums are committed to providing appropriate policies and/or designations to address issues of common ground including wind energy development and minerals development in sensitive landscapes such as the Sperrin AONB; improving transport infrastructure and improving digital communications infrastructure e.g. Broadband and mobile provision. In addition to these forums, the Council has ongoing liaison with neighbouring authorities and ongoing review of proposals within adjoining local plans and other development plan documents.”	<p>Collaborative working (Cross Boundary Forum) between all 4 councils with an interest in the Sperrin AONB, is ongoing.</p> <p>The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals Development (ACMD).</p> <p>The Council notes that (as per paragraph 4.74 of the Draft Plan Strategy) those mineral resources that are of economic or conservation value should be safeguarded to allow for future exploitation. When more robust evidence is made available, these areas will be identified at the Local Policies Plan Stage.</p> <p>Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the</p>

				pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.
21	4.3	Spatial Characteristics	The Sperrin AONB is one of a number of landscape types comprising the FODC area.	Noted and agree.
26	5.9	Vision & Strategic Objectives	FODC's Vision for the district, in relation to the AONB is that..."areas such as the Sperrin AONB....will have been maintained and managed."	Noted and agree.
30	-	Draft Strategic Policy SP01:	Furthering Sustainable Development	Noted.
32	6.7	Settlement Overview: Main Towns	The Sperrin AONB location, within a 20 minute drive from Omagh, offers the opportunity for the town to expand and enhance its contribution to tourism.	Noted and agree.
113	4.45	Tourism – Context & Justification	The Sperrin AONB is "one of the most unique landscapes in Northern Ireland".	Noted and agree.
114	4.49	The Tourism Strategy	FODC's Tourism Strategy seeks to establish the Council area as a 'must visit' destination, without adversely impacting upon the landscape, historic environment and built environment. For example, appropriate protection will be afforded to Cuilcagh Mountain and the unspoilt upland areas of the Sperrin AONB.	Noted and agree.
114	4.50	The Tourism Strategy	It is anticipated that promotion of key tourism assets such as the Sperrins will result in increased visitor numbers and in turn, create increased	Noted and agree.

			demand for sustainable tourism development which includes tourist accommodation and tourist amenities.	
146	5.45	Landscape – Context & Justification	“The Council area has a variety of unique and special landscapes, and there are some areas which are designated primarily for this reason. The Sperrin Area of Outstanding Natural beauty (AONB) is a largely mountainous area which occupies a significant portion of the north east of the Council area. This designation seeks to protect and enhance natural beauty whilst also recognising the needs of the local community and economy.	Noted and agree.
147	5.46	Landscape – Context & Justification	The Sperrin mountains form a back drop to the north east ..., stretching from the Strule valley in the west to the perimeter of the Lough Neagh low lands in the east. The area presents vast expanses of moorland with the mountain valleys of the Glenelly and Owenkillew rivers lying below. They are widely recognised as the largest, most unspoilt and least explored mountain range in Northern Ireland, including a particularly diverse range of landscape types.	Noted and agree.
147	5.47	Landscape – Context & Justification	Scenically the area has much to offer, such as Mullaghcarn and Gortin which are a much-visited part of the AONB and lie within our Council area. The core mountain areas are relatively isolated, bringing a strong sense of wildness and tranquillity. The AONB is also an area of outstanding geological interest, including resources of gold and other valuable minerals, and contains stretches of	The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals Development (ACMD). The Council notes that (as per paragraph 4.74 of the Draft Plan Strategy) those

			intact blanket bog such as black bog, a European protected habitat. There are examples of many distinctive archaeological features including Stone Age megalithic tombs and bronze Age landscapes. For these reasons, it is important to protect the integrity of the portion of the Sperrin AONB that lies within our Council area whilst at the same time recognising the needs of rural communities living there.	mineral resources that are of economic or conservation value should be safeguarded to allow for future exploitation. When more robust evidence is made available, these areas will be identified at the Local Policies Plan Stage. Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.
148	5.50 - 5.53	Draft Policy L01:	Development within the Sperrin Area of Outstanding Natural Beauty	Noted. Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.
149	5.54	Draft Policy L02:	Special Countryside Areas	Noted.
160	-	Draft Policy RE01:	Renewable and Low Carbon Energy Generation	Noted.
168	6.56	Public Utilities – Context & Justification	To underpin economic growth, it is also necessary to have a safe, secure, reliable energy infrastructure network. New energy infrastructure must be carefully planned and assessed to avoid	Noted.

			adverse environmental effects, particularly on or near protected sites and areas of landscape sensitivity including the Sperrin AONB. Overhead power cables will be facilitated but should avoid running through or adjacent to Sensitive Locations or Features.	
169		Draft Policy PU01:	Telecommunications	Noted.
179 & 204	-	Monitor Indicator 25: Landscapes	New development within the AONB, SCA and AoHSV.	Noted.
213	-	Glossary	AONB Definition: An area that has been designated for conservation due to its significant landscape value of national importance	Noted.
217	-	Glossary	Sensitive Locations & Features Definition: These comprise of: Landscapes including: - Sperrin AONB; Special Countryside Areas; Areas of high Scenic value;	Noted.
250	1.7	Appendix 7:	Wind Energy Strategy	Noted.
258	2.2.6	Appendix 7: Wind Energy Strategy – Guidance for Wind Energy Development LCAs 25. Beaghmore Moors and Marsh;	“The Beaghmore Moors and Marsh form the lower foothills to the Sperrins and are of a smaller scale than the core of the AONB area further to the north. While its character suits a level of smaller scale wind energy development, the AONB designation results in no capacity for turbines greater than ‘medium’ size (<80m), and then only as scattered single or small turbine groups. This landscape should be maintained as a landscape with occasional wind turbines.”	Noted.

258	2.27	<p>Appendix 7: Wind Energy Strategy – Guidance for Wind Energy Development</p> <p>43. Carrickmore Hills Underlying Landscape Capacity</p>	<p>“While mostly outside the AONB apart from the Murrins, the character of the Carrickmore hills is sensitive to wind energy development due its more irregular and craggy landform, lacking the simplicity of landscapes most suited to wind energy development. The hills are also small scale, with landscapes of lowland character. However small-scale windfarm development, comprising a limited number of ‘medium’ or ‘medium/ large’ (<120m) sized turbines can be accommodated in this landscape, making use of variations in topography to partially screen and conceal wind turbines and infrastructure. Smaller wind turbine typologies can be sited with farms and properties. This landscape has capacity to appear as a landscape with wind turbines, however the landscape around the Murrins has a lower capacity.</p>	Noted.
270	2.5.20 – 2.5.22	<p>Appendix 7: Wind Energy Strategy – Guidance for Wind Energy Development</p> <p>LCAs 24. South Sperrin; 26. Bessy Bell and Gortin Underlying Landscape Capacity</p>	<p>North eastern parts of the South Sperrin LCA contain remote upland areas of forestry partly contained by ridges, and in an area of low visibility from surrounding lowland landscapes. However, this area is also likely to be easily visible from the more upland landscapes north of the Glenelly valley. While characteristics of this landscape suggest suitability for a large-scale windfarm development, the high value of the landscape resulting from the AONB designation renders this landscape highly sensitive to this scale of development. Many of the other upland areas are visible from either within the AONB or from lowland</p>	Noted.

		<p>areas to the south retaining these landscapes as wild and remote uplands should be a key landscape objective to ensure the integrity of the AONB designation.</p> <p>Therefore, for both LCAs, capacity exists only in the more lowland valley locations. Within Bessy Bell and Gortin there is limited potential for up to 'medium' sized turbines (<80m) and single developments or small groups, however the basin-like form of the landscape means that wind turbines would appear prominently in central locations, particularly when viewed from scenic viewpoints in Gortin glen Forest park.</p> <p>The enclosed character of South Sperrins valleys means that even 'medium' sized turbines can appear very prominent, and there is capacity only for 'small' or 'small/ medium' sized turbines (<50m) in the more populated valleys to the west, with 'medium' (50<80m) turbines only suited to some of the larger scaled lowland areas to the east, in locations where they can be visually contained by surrounding landforms.</p>	
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277	2.10	Appendix 7: Wind Energy Strategy – Guidance for Wind Energy Development LCA 21. Fairy Water Valley Underlying Landscape Capacity	“Within many of the remaining LCAs of Fermanagh and Omagh there is very limited remaining capacity for small scale wind energy development below 80m. Some parts of these areas have effectively no capacity, for reasons including landscape character, visual sensitivity and/or landscape value. These areas include: • The nationally designated Sperrin AONB...”	Noted.
288	5.6	Appendix 7: Wind Energy Strategy – Guidance for Wind Energy Development	Presentation material to be provided with proposals: Map showing site location and location of valued landscape features within the study area on a 1: 50,000 OS base (as before), including all the designations and features listed below (and equivalents in the republic of Ireland). Concentric distance bands as above. Viewpoint locations.	Noted.
298	Table	Landscape Character Area: 24. South Sperrin	Landscape Sensitivity	Noted.
299	Table	Landscape Character Area: 25. Beaghmore Hills and Marsh Landscape Character Area:	Landscape Sensitivity	Noted.

		26. Bessy Bell and Gortin		
304		TABLE 1: Relationship between Draft Plan Strategy and Existing Area Plans prior to the Adoption of the Local Policies Plan	The Sperrin AONB is shown on the Draft Plan Strategy Proposals Map.	Noted.
MAPS				
Proposals Map 1 – North East				
	<ul style="list-style-type: none"> Environmental Designations 		Policy NE01	Noted
	<ul style="list-style-type: none"> Sperrins AONB 		Policy L01*	* The Council notes that reference to Policy L01 (AONB) should read “See Policy L02”.
	<ul style="list-style-type: none"> Proposed Special Countryside Area (SCA) 		Policy L02*	* The Council notes that reference to Policy L02 (Proposed SCA) should read “See Policy L01”.
	<ul style="list-style-type: none"> Proposed Area of Significant Archaeological Interest (ASAI) 		Policy HE02	Noted
	<ul style="list-style-type: none"> Proposed Area of Constraint on Minerals Development (ACMD) 		Policy MIN01	The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals

		<p>Development (ACMD).</p> <p>Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.</p>
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Appendix 2

Table 2: Draft Plan Strategy (Sustainability Appraisal) references to Sperrin AONB

TEXT				
Page	Paragraph	Topic	Detail	CC&GBC Comment
12	1.2 & 1.6	The Study Area	Acknowledges that the AONB falls within it.	Noted
38	Table 4:MIN01	Summarising effects of Draft Plan Strategy: Reasonable Alternatives identified and considered.	Two options were considered for identifying Areas of Constraint on Mineral Development (ACMDs). Option 2 was more encompassing as it proposed ACMDs would include the AONB and AoHSV. Both options when assessed against the SA Framework achieve similar scores with variety only in the level of protection of landscape and potential long-term viability of employment. The terms of policy MIN01 include exceptions which would minimise any negative effects. Discussions with Members, aware of the implications of this choice, have directed towards Option 2.	The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals Development (ACMD). Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.
42	Table 5:	SA Objectives & Monitoring Indicators	No target set for AONBs	Noted
75	8.2 & 8.3	Landscape	The Sperrins form a backdrop to the FODC district in the north east. Visual implication of wind farms and minerals in the Sperrin AONB.	The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of

				<p>Constraint on Minerals Development (ACMD).</p> <p>Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.</p>
76	9.3	Minerals	Makes reference to ongoing gold exploration at Curraghinalt which lies within the AONB.	<p>The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals Development (ACMD).</p> <p>Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.</p>
90	-	Key Characteristics & Baseline Info.	The Sperrin AONB is counted within this number.	Noted

		Cumulative number, distribution and area (ha) of sites designated for their landscape and wildlife importance.		
96	-	Landscape	Identifies the AONB, designated on 11/08/08, lies partially within FODC area.	Noted
180	-	Under Section C: National & Sub Regional	Refers to the many Forest Management Plan that cover FODC areas, including the Sperrin AONB.	Noted
212 & 213	-	Table 14: Minerals Development: Policy MIN01 - Options	Option 2 chosen. Include AONB.	<p>The Council notes that the whole of the Sperrin AONB area (located within FOCD administrative boundaries) is shown as a proposed Area of Constraint on Minerals Development (ACMD).</p> <p>Draft Policy MIN01 is noted. However, CC&GBC has concerns regarding the pressure that the blanket ACMD designation (across the entire AONB) and the associated minerals policy approach would place on this Council.</p>
218	-	Table 17: Landscapes: Policy L02 SCA - Options	Option 2 chosen. Keep existing SCA & identify others.	Noted

220	-	Table 19: Renewable Energy: Policy RE01	Mixture of Options 1 & 2.	Noted
223	-	Table 21: Public Utilities: Policy PU03	This is a new option.	Noted
227	Policy Tracker	-	Reference made to AONB throughout tracker.	Noted