

Draft Policy	Comment	Suggestion
HOU06 Open Space in New Residential Developments (p.67)	Welcome the requirement to provide an equipped children's play area for applications of 100 units or more.	Amend the draft policy to take into consideration future phases of development ie. 2 consecutive block of 95 units could obviate the requirement to provide an equipped play area.
DE07 – Advertisements (p.57/58)	I appreciate that advertisements should not detract from the character of an area nor compromise public safety.	The proposal to prohibit signs outside existing businesses in the countryside is unfair and would place rural businesses at a greater disadvantage to urban counterparts. May also be at odds with FODC's rural proofing duty under the Rural Needs Act.
HOU03 – Affordable Housing in Settlements (P.63)	Welcome proposal to require 10% of units in housing developments of 10+ units to be allocated for affordable housing.	Concern that this is dependent on established need by the Housing Needs Assessment. These (HNA's) typically underestimate the actual need for affordable housing esp. in rural areas. Remove the need for a HNA at planning stage.
HOU09 – Rural Replacement Dwellings (p.72)	If a site has a curtilage, long established boundaries and there is other evidence (pictures, old maps, remains of walls etc) of it being used as a dwelling this should take precedence over a requirement for all external walls to be substantially intact (even with small areas missing).	Remove the requirement for all external walls to be substantially intact. Replace this with 3 walls or 2 walls visible from critical points as proposed in HOU11 (Redevelopment of a former site for dwelling).
HOU12 – Dwelling on a farm Business (p.76)	Proposals are broadly similar with the current PPS21.	Accept the requirement for farm businesses to be active but the 6-year requirement is too prohibitive. Changing this to 3 years would reduce this prohibition would also be sufficient to deter potential applicants from setting up a farm business solely for the purpose of securing planning permission. Farming is a very fluid and volatile business and many transactions such as conacre and purchases are conducted informally. In recognition of this, there should be flexibility on the stated requirement for 'full accounts' (p.77) and other evidence such as herd and flock records should be accepted as supporting evidence of farm activity.
HOU14 – Rounding Off and infilling (p.78)	Current proposal is to restrict infill 'gap' sites from 2 (PPS21 Cty 8) to 1 and references a settlement focal point such as a road junction.	Many clusters are a product of previous planning policies and have emerged due to children and siblings building 'beside the family home'. There is not always an obvious focal point such as a cross road etc. so a new policy should accept that clusters exist and remove the requirement of a focal point. In many cases the focal point is a family homestead. In the case of an infill or gap site. This gap should be retained as one that could facilitate a maximum of 2 sites.

HOU17 – Affordable Housing in the Countryside (p. 81)	Has the potential to provide affordable housing in rural communities and enhance the vibrancy of ‘Rural Community Areas’	Agree with point 3.62 which specifies that a proposed site should be located at a focal point such as a church, school, hall or community facility. Crossroads should be added to this as many of the aforementioned focal points are in areas that are already designated as villages or hamlets.
HOU18 – Residential Caravans and Mobile Homes (p. 82)	Broadly supportive of this draft policy.	In respect of personal and domestic circumstances, these can be life long and requiring the applicant to re-apply for permission every 3 years on top of other challenges such their annual PIP assessments would be an additional burden. The 3 years should be extended to 5 years or guided by the prognosis from the applicants GP or other relevant health professional.
Housing Allocation (p. 40)	The provision of adequate housing is vital for the survival of our local towns to create vibrancy and sustainability.	The projected need of only 28 dwellings for Carrickmore town (compared to Irvinestown 151 & Fintona 97) is inadequate and does not reflect balanced development. Such a low project could actually stunt the growth of Carrickmore as a town and important service centre. The housing projection for Carrickmore should be substantially raised to least 70 dwellings.
IB04 – Industry & Business development in the Countryside (p. 97)	An effective policy is important to sustain the rural economy and support the successor (if any) to the Rural Business Investment Scheme.	The final policy should recognise and support the creation of home-based ‘cottage industries’ such as craft making and that many business owners in rural areas use their home and yard for short term storage of materials ancillary to their main business. For example, a construction firm owner may store planks, generators or building materials over-night and/or between jobs. This should be accepted in the final policy. The reference to ‘lawful’ presumably is a requirement for a CLUD .
MIN01 – Minerals Development (p. 123)	Public health and the environment must be strongly protected in the Councils Minerals Development policy.	The use of cyanide for mining purposes should be forbidden. This is consistent with the European Parliament resolution of 27 April 2017 on the implementation of the Mining Waste Directive (2006/21/EC). (566 MEP’s voted in favour; 8 voted against). Peat extraction – the policy should support people who ‘cut turf’ for domestic purposes provided it is carried out with as little environmental or biodiversity impact as possible.

[REDACTED]

From: Declan Mc Aleer [REDACTED]
Sent: 19 December 2018 16:46
To: Development Plan
Subject: LDP Consultation response from Declan Mc Aleer MLA
Attachments: LDP consultation response.docx

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Hi

I have considered the draft Fermanagh-Omagh LDP which was launched in October 2018 and attached I have included a number of amendments and inclusions that I would appreciate Council's consideration of.

Regards,

Declan Mc Aleer MLA