

## Appendix 2: Summary Table of Statutory Consultee Responses to LDP Preferred Options Paper

Statutory Consultee	Summary
<p><b>Department for Infrastructure (DfI)</b></p>	<p><b><u>Vision</u></b> Council may wish to give consideration to developing a vision that is locally distinct, and that reflects and seeks to make the most of the unique characteristics of FODC.</p> <p><b><u>Strategic Objectives</u></b> To support the achievement of the vision there is a need to ensure that the vision is carried through into the plan objectives.</p> <p>Strategic Objectives should address the key issues identified for the district and based on the evidence base. Strategic objectives should be integrated with regional/local policies and strategies.</p> <p>How will proposed objectives will be delivered, measured and monitored? The monitoring of progress of plan objectives is a key element of review process/measuring effectiveness of plan provisions.</p> <p>Plan objectives should represent a logical/coherent response to issues identified from evidence base and those trends highlighted in the spatial portrait.</p> <p>Data in relation to household formation is not supportive of the strategic objective of the RDS that aims to encourage an urban/rural renaissance and to manage housing growth to achieve sustainable patterns of residential development. Has this been considered in relation to the objective for housing and to clarify if the emphasis is on developing more high quality homes within existing urban areas. Need to address the increase in requirement for new social house and homelessness in the objectives.</p> <p><b>Crumlin Road Gaol and St Lucia Team.</b> Recognise the expansion of Omagh and Enniskillen. Need to seek ways to identify the distinctiveness of different areas within these towns, and seek better connection within them for pedestrians, public transport and cars.</p> <p>Further align draft objectives with the spatial framework guidance within the RDS - for instance by acknowledging that Enniskillen and Omagh are best placed to benefit from regional economic growth. The commitment to facilitate the creation of new jobs at suitable locations does not acknowledge the role of hubs and clusters of hubs in generating economic growth and jobs.</p> <p>Questions the ability to secure objective in relation to improving physical connectivity and accessibility etc. as it is dependent</p>

upon the actions/investment strategies of other bodies or agencies. Council should be confident of the realistic delivery of such commitment, particularly where investment is required.

**Transportation Planning and Modelling Unit** – DfI will not be seeking to improve journey times within settlements. PfG indicator 23 focuses on the ‘average journey time on key economic corridors’ which largely relates to interurban connectivity.

Consideration should be given to further supplementing the objectives to include specific reference to renewable energy.

**Public Transport Services** - Suggest that the objectives are contradictory e.g. regarding creation of jobs in suitable locations where they are accessible to all members of the community, including those without a private car.” which implies that jobs should be close to where people live Vs “to build Enniskillen and Omagh as economic and transportation hubs etc.”

**Water and Drainage Policy Unit.** The principles of Sustainable Water –A Long Term Water Strategy should be considered in the vision and objectives for the LDP to assist in working towards a sustainable environment.

**Crumlin Road Goal and St Lucia Team**

Merit in recognising the wonderful leisure and tourism opportunities that already exist in FODC, which span a diverse range of sectors/industries, with the aim of seeking to develop clusters, new partnership opportunities (that extend beyond the Council’s boundary but that combine tourism opportunities to present a wider offering) and additional promotional opportunities.

**Overarching Principles**

Reminded of 5 core planning principles of the SPPS in relation to the overarching principles, and the extent to which the policy proposals of the Plan align with these principles.

Remove reference to developer contributions from Overarching Principles – ensure that wording matches that within the SPPS when replaced elsewhere.

**Water and Drainage Policy Division.** The principle of sustainable water should be reinforced in the LDP to ensure that adequate infrastructure, including water and sewerage infrastructure is provided.

**General Comments in relation to policy options**

Demonstrate how preferred options will deliver the vision and strategic objectives of the plan. The link with regional policy should be adequately demonstrated – departures should be adequately demonstrated & supported by robust evidence base. SPPS should be read and applied as a whole. Concerns that some options lack sufficient clarity and not aligned with the approach set out in the SPPS. Councils should ensure that options provide a coherent policy response to the main issues identified.

Need to draw out linkages between policy areas and land uses. Consider how the preferred growth strategy can more fully reflect the SPPS subject policies. For example, housing in settlements, development in the countryside and transportation. This has been done for inter-relationship between housing, economic development and retail and service provision, and to the relationship between economic development and transportation.

### **Spatial Options**

Options should be set within the regional and prevailing policy context, as well as the context provided by other relevant regional and local plans and strategies.

Concern that the distinction between Options 1 and 3 is not clear enough. Appears that difference between 1 & 3 is the proportion of housing allocated to the countryside (13.6 % compared to 26.4%). Department's view is this is insufficiently clear from the discussion around the Spatial Growth Options presented.

Option 2 - is this a realistic option? It is the Department's view that a dispersed growth option would not site within the policy framework established by the RDS and SPPS

**Transportation and modelling unit.** Growth outside towns/hubs, where there are little or no public transport services will lead to accessibility being compromised.

Option 3 fails to mention the additional infrastructure requirements associated with this option. This option does not appear to support sustainable transport.

Accessibility analyses maps prepared by DfI could be used by the council to examine in greater detail the accessibility of potential sites to be zoned. LDP needs to reflect the strategic roads programme, providing necessary protection of lines.

Current zoned land remaining undeveloped as it remains landlocked. The allocation of housing/economic development land must have regard to deliverability and the likely availability of the land to come forward for development.

**Crumlin Road Goal and St Lucia Site.** Recent economic and educational changes have resulted in a high number of

brown field sites currently available or becoming available within and near town centres.  
Is there potential for town centre boundaries to be amended to accommodate anticipated future regeneration and to use this to enable the regeneration of the traditional town centre/heart of the community?

### **Housing Allocation**

Notes Council's commitment to allocate housing based on focusing major population growth in the hubs of Enniskillen and Omagh and providing balanced growth in the local/small towns.

Department has some concerns that the preferred Housing Allocation option fails to support the RDS objective of managing housing growth to achieve sustainable patterns of residential development - in furthering sustainable development it is important to manage housing growth having regard to the inter-relationship between housing, jobs, services and infrastructure. Important that the levels of growth do not exceed the capacity of the environment or existing infrastructure in this location.

Department has some concerns that the POP has not adequately demonstrated how the preferred Housing Allocation of 27.1 % of the HGI to the countryside is consistent with regional policy or that it represents a coherent option for delivery of the preferred Growth Strategy or addressing certain key trends within the Council Area.

Council is reminded that policy proposals that aim to create a critical mass of population to support a level of services will raise challenges for service providers in meeting the needs of a spatially dispersed population.

### **Economic Development Land Allocation**

Council should satisfy itself that the justification for selecting the preferred methodology for allocating Economic Development Land is consistent with other parts of the POP – e.g. Economic Development in the Countryside. Will the Council give further consideration to the impact of such a proposal on the uptake of economic development land within towns and villages? Council need to ensure that the impact on environment, infrastructure and services is adequately considered.

### **Development in the Countryside**

Policy approaches should represent a logical and coherent response to the preferred growth strategy. The criteria is not clear for the designation of Rural Protection Areas. It would have been more meaningful to have identified for public consultation the number and extent. Query how this will operate alongside the carried forward policies in PPS21?

**Transportation and modelling unit.** Option 3 – drive time is only relevant to people with cars – consideration should also have been given to public transport accessibility.

### **Addressing Regeneration and Deprivation – Urban Areas**

This should be read in conjunction with the comments re allocation of economic development land. Council is reminded that options should be realistic, appropriate and deliver the intended outcome. Further clarification is requested on the proposal to bring forward criterion based policy for the provision of new build economic development the countryside. Important to demonstrate cross boundary working to demonstrate soundness.

Councils should note that mineral applications are required to be assessed for their compliance with the deemed conditions associated with the Planning (Management of Waste from Extractive Industries) Regulations (NI) 2015.

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### **Minerals Development**

Important to demonstrate cross boundary working to demonstrate soundness. Councils should note that mineral applications are required to be assessed for their compliance with the deemed conditions associated with the Planning (Management of Waste from Extractive Industries) Regulations (NI) 2015.

### **Overarching Renewable Energy**

Need to reference Strategic Energy Framework and reflect renewables in the strategic objectives.

The SPPS states that a cautious approach to renewable energy development proposals will apply within designated landscapes which are of significant value, such as AONBs – this does not amount to a presumption against renewable energy within those landscape.

Onus is on the Council to provide evidence to support the preferred option founded on robust and credible evidence base. Council should ensure that they have the necessary evidence to justify the proposed approach – for example, demonstrating that there is no further capacity to accommodate any wind energy development within these sensitive areas.

### **Overarching Tourism**

DfI do not like name read alongside carried forward tourism policies – need to rethink.

**Crumlin Road Goal and St Lucia Team.** Sound section with a very tradition term. Would there be merit in using phrases like ‘seeking opportunities to enable existing tourism provision to develop innovatively to meet the needs of niche and future tourism users.’

### **Operational Tourism**

Need to provide more clarity for proposals beyond visitor hubs as would not conform to tourism strategy.

### **Lakes and Waterways**

Council should ensure that options and justifications are consistent. Suggested that option 2 being consistent with tourism strategy is contradicted in justification.

### **Supporting Good Design and Place Making**

Department seeks clarification as to whether this issue has been considered within the strategic objectives or overarching principles of the Plan.

**Transportation and modelling unit.** Missed the opportunity to address how transport can contribute to place making. For example, it is suggested that parking has the potential to contribute to place making. Opportunities to achieve this are linked to the Local Transport Plan process – e.g. the relocation of car parking to reduce vehicle dominance in town centres.

### **Carried Forward**

These should take account of Strategic Objectives and Vision, with regard to plan evidence and regional policies etc. DfI seek clarification of what assessment of retained policies has taken place. There is a need to note the impact of the SPPS on the policies within PPS5. All carried forward policy options should be taken through the SA/SEA process. Council will have to provide evidence of this assessment.

**Transportation and modelling unit.** Accessibility analyses, although featuring in PPS13, was not widely adopted universally. The Department is keen for accessibility analyses to be used more widely in the development of the Local Development Plan.

The Sub Regional Transport Plan should be treated as the current transport proposals for the area as it will remain extant until such time as the a new local transport study has been agreed for the area.

	<p><b>Transport NI.</b> Bus routes/rail routes and general access to public transport should be reflected in the consideration of zonings within LDPs. Parking policies for towns will be a key aspect of transport plans and will impact on considerations for new car parks within LDPs.</p> <p><b>Rivers Agency.</b> Set out what the Local Plan Policies will do and advise caution at this stage as the policies have not been drafted. Once these have been drafted they will have to be examined in detail for any omissions or departures from the SPPS.</p>
<p><b>Department for Economy (DfE) - Minerals and Petroleum Branch/GSNI</b></p>	<p><b><u>Minerals Development</u></b></p> <p>The DfE does not agree with the preferred option as it does not adequately take account of the economic value of minerals or address the points by DfE/GSNI in previous responses and in discussions with FODC.</p> <p>Welcomes option 1 and also welcomes the recommendation in Option 3 to identify areas for safeguarding minerals within the plan area. DfE questions the additional constraints proposed in Option 2 which does not seem to be compatible with the minerals strategy established in the SPPS (Para 6.155 and Para 6.157) or PSRNI (MIN4).</p> <p>The Department wishes to seek clarity on the evidence base for the proposed 15 year restriction on mineral development in the proposed areas of constraint. DfE believes that each proposed mining development should be assessed on its own merits through the planning process. If a mine development receives planning permission it seems illogical to place an arbitrary time limit on mining operations which would be well below the economic lifespan of that mine. DfE cite examples of mines which have been in operation periods of years.</p> <p>Would appear that the Preferred Options Paper is based on an understanding of the aggregate industry based on the long history of extraction from hard rock quarries and sand &amp; gravel pits in the Council area. The Preferred OP does not reflect insight into the nature of exploratory works for high value minerals. POP reveals little experience or knowledge of the development of high value minerals by underground mining given the lack of such operations in the council area within recent years. Little information is provided in relation to oil and gas. A distinction should be made between exploration for, and extraction of, unconventional hydrocarbons, such as shale gas, and conventional oil and gas because the scale and methodologies of these are quite different and raise quite different sustainability issues.</p> <p>DfE - preferred options would benefit from modification to take account of the differences in the exploration and development in 3 main categories – low value aggregates, high value metalliferous minerals and energy minerals.</p> <p>The DfE would recommend that the POP is revisited in light of this additional information and subject to further engagement with DfE/GSNI on safeguarding of minerals.</p>

	<p><b>Question 9b: Are there any other areas that should be considered as Areas of Constraint on Mineral Development?</b></p> <p>DfE do not support further constraint on mineral development, in particular in relation to UNESCO Geopark. Geoparks are not a statutory designations and should not restrict planning and development providing the main geological heritage of a UNESCO Global Geopark is maintained and protected. This should be achieved on a site by site basis and not applied to an entire area. DfE reference extracts from a UNESCO publication <a href="http://unesdoc.unesco.org/images/0024/002436/243650e.pdf">http://unesdoc.unesco.org/images/0024/002436/243650e.pdf</a> in relation to Sustainable Development and Natural Resources. DfE have highlighted that under natural resources it is stated that : “UNESCO Global Geoparks inform people about the sustainable use and need for natural resources, whether they are mined, quarried or harnessed from the surrounding environment, while at the same time promoting respect for the environment and the integrity of the landscape.”</p> <p>In addition to their representation on the POP, DfE have produced a document titled Information on Minerals Development to Inform Local Council Preferred Options Papers. Specific reference is made to reserves within the FODC area, ie gold and gas.</p> <p>DfE disagrees with time limiting permissions, stating this is both arbitrary and unnecessary.</p> <p>*Also notes there may be potential for conventional production from some sandstone units in the NWCB but this is likely to be very limited.</p>
<p><b>Northern Ireland Environment Agency</b></p>	<p>Welcomes the preferred options which seek to recognise and protect the quality landscapes of the area and protect them from development (minerals development, renewable energy, tourism and supporting good design). NIEA are concerned at the absence of a separate section within the POP on the natural environment. Comments that it is not clear how the capacity to absorb development has been assessed.</p> <p>Concerned at omission of proposed AONBs for the Fermanagh Caveland and Erne Lakeland as these are important natural assets.</p> <p>In regard to LLPAs, notes that existing designations will be reviewed and comments that the methodology for identifying them has improved over time and that an LLPA policy will need to be included in the Plan.</p> <p>They note that there is no need to identify new housing land through extension of settlement limits and suggest that previously zoned housing land may be more suitable for open space/recreational or Development Opportunity Sites.</p> <p><b><u>Spatial Growth Options</u></b></p>



	<p>Supports Option 3 in principle but with a caveat on the percentage growth to be allocated to smaller settlements and the open countryside. The proportion allocated for housing across the countryside is a concern and would query whether the proportion to the Main Towns is consistent with the RDS.</p> <p><b><u>Development in the Countryside</u></b> Supports, in principle, the zoning of the countryside into zones that can accommodate and absorb development without detriment to biodiversity and landscape. Suggests that buffer zones around European sites and known priority habitats, should also be excluded from RPAs.</p> <p><b><u>Addressing Deprivation/Regeneration in Urban and Rural Areas</u></b> Supports preferred option for urban areas with caveat that any environmental constraints are sustainably addressed. Supports Option 1 for Rural Areas but with a focus on RPAs.</p> <p><b><u>Minerals Development and Renewable Energy</u></b> Supports in principle the preferred option for each subject to addressing any environmental or landscape constraints.</p> <p><b><u>Tourism</u></b> Supports, in principle, the designation of Tourism Conservation Zones (TCZ) but suggests they should be carefully chosen with attention to ‘exact’ boundaries. Tourism development outside a TCZ should not necessarily be a given. The location of ‘Visitor Hubs’ needs to be carefully chosen and adequately address any environmental constraints (NIEA would wish to comment on the locations of them)</p> <p><b><u>Lakes and Waterways</u></b> Supports Option 1.</p> <p><b><u>Supporting Good Design and Place Making</u></b> Supports the preferred option.</p> <p><b><u>Carried Forward Policies</u></b> Notes intention to carry forward Policies NH1-NH6</p>
<b>Department for Communities (DfC) - Historic Environment Division (HED)</b>	HED advise that they have serious concerns that merging existing policies for archaeological sites and monuments and for listed buildings into two block policies, would change emphasis and create significant confusion in the approach to the protection of heritage assets. It could lead to contravention of legislative protections and failure to meet obligations under international conventions on the protection of built and archaeological heritage. Considers that existing policies are clear and

provide for a hierarchy of protection in relation to both archaeology and built heritage.

Response to specific questions in the POP were made as follows:

**Q1** In relation to environmental objective i), HED recommend that this concludes with built heritage and archaeological heritage, to more fully encompass the range of heritage assets within the district.

**Q3, Q5, Q7 & Q8** HED agrees with preferred options for Spatial Growth, allocation of economic development land and addressing deprivation/regeneration in rural/urban areas. However, recommends that development proposals for new retail and services provisions might also include the sustainable re-use of older/vernacular buildings which have some local heritage interest, in accordance with SPPS.

**Q10** Agrees with preferred option for renewable energy.

**Q12, 13 and 14** Careful consideration should be given to development of tourism facilities in order to protect and conserve heritage assets and to comply with SPPS policies on the protection of archaeology and built heritage.

**Q15** Agrees with general approach to lakes and waterways but would advise that account should be taken of impacts on heritage assets and their settings and shipwrecks. Fermanagh has a huge corpus of freshwater archaeology including very many crannogs.

**Q16** Agrees with preferred option for supporting good design and place making.

**Q17** Suggests that Candidate ASAs identified by HED which lie within or partially within the Council area should be designated. The Gazetteer of Nucleated Historic Settlements will be a useful tool for the LDP. This will also assist in the definition of town centres and potentially help inform ATCs. Some text in relation to each zone identified and the history of the settlement will be provided by HED.

**Q18** Recommends use of their GIS spatial data to identify sites of heritage interest within and adjoining settlements to inform the designation of LLPAs. Careful account should be taken of the setting of heritage assets.

**Q19** With regard to control of outdoor advertisements, significant consideration should be taken in regard to the design, scale, material and illumination of outdoor advertisements, especially where it relates to affixing to or within curtilage of a listed building, protected area of scheduled monument or State Care monument and large scale advertisement proposals within 50m of setting of a listed building or site of scheduled monument or 100m for State Care monument.

**Q27** In relation to opportunity/vacant sites in Enniskillen and Omagh, KSRs should provide for appropriate impact assessments where such sites lie within Areas of Archaeological Potential. Where they lie within the setting of listed buildings, they should respect the character of such buildings, its setting and material, scale, height, massing and alignment. HED also highlighted a number of matters as potential policy gaps, which supplementary policy to the policies in SPPS could help to address. These included:

- specific changes to wording to provide enhanced clarification of policy;
- there should be inclusion of 'heritage-led' approaches to redevelopment proposals within ATCs and demolition of listed buildings;
- reports to justify demolition should be from conservation accredited professionals (engineers, architect and/or surveyors);

	<ul style="list-style-type: none"> <li>• use of best practice BS 7913;</li> <li>• the understanding of ‘setting’ should be as set out in PPS 6;</li> <li>• ensure non-listed vernacular buildings are afforded adequate protection and recognition and that evidence for their demolition should be from suitably accredited backgrounds.</li> </ul> <p>HED’s comments also provided links to useful information to use as a resource base for LDP preparation. They will assess via a risk based approach what level of site specific analysis and advice can be provided to Councils on historic environment related matters during the preparation of development plans.</p>
<p><b>Northern Ireland Housing Executive</b></p>	<p><b>Summary of Comments from NIHE (Online Questionnaire)</b></p> <p><b>Q1</b> Whilst generally supportive of the strategic objectives, NIHE would seek amendment to the social objective (iv) in order to recognise the housing needs of our whole society by including an acknowledgement of the need for affordable housing and provision of mixed tenure, as set out in the SPPS.</p> <p><b>Q2</b> Agrees with settlement hierarchy.</p> <p><b>Q3</b> In relation to Spatial Growth Options, NIHE would like to see a revised option 3 which includes ‘balanced growth across the small towns, villages and small settlements.’ They are concerned at the inclusion of accommodating small groups of houses within the countryside as development within the open countryside should be limited as it is contrary to sustainable development.</p> <p><b>Q4</b> In relation to the Housing Allocation, NIHE disagrees with the Preferred Option 3 and seems to suggest that this would allocate three times as many houses to the open countryside as to the local towns. It would also like to see a higher proportion allocated to the towns, villages and small settlements rather than the open countryside. Considers that each of the options conflict with the LDP’s strategic objectives. Considers that the LDP should curtail the growth of single dwellings in the countryside and that sustainable residential development should primarily occur within settlement development limits in order to promote connectivity and more sustainable patterns of travel. A revised Option 3 as per these suggestions would be better aligned with the RDS., the SPPS and Sustainable Development Strategy.</p> <p><b>Q5</b> Disagrees with Preferred Option for Economic Development Land Allocation in that the allocations should be revised to align with the housing allocations proposed in their response to Q4. Would like to see the Council considering the inclusion of simplified planning zones for economic development in Enniskillen and Omagh.</p> <p><b>Q6</b> Disagrees with Council’s preferred option for sustaining rural communities. Requires further clarification on Rural Diversification Areas, the number and extent of RDAs and the level of relaxation of policy intended. Emphasises the need again to see development directed primarily to settlements, with SCAs designated for sensitive landscapes and the remaining countryside subject to the provision of PPS 21. If RDAs are taken forward, they should be based on robust evidence of decline, they should be small scale and outside environmentally sensitive areas. The focus of development in RDAs should be upon economic opportunities and service provision rather than residential development.</p> <p><b>Q7</b> Supports the Preferred Option in relation to addressing deprivation/regeneration in the urban area.</p>

**Q8** Disagrees with the Preferred Option. Would require further clarification on RDAs as per response to Q6.  
**Q10** Agrees with Preferred Option.  
**Q11** Disagrees with Preferred Option. Considers that the use of renewable energy and passive solar design should be encouraged for all developments, not just public sector. Would like Option to be revised to include all developments and seeks clarification about the thresholds to be applied for each category of development.  
**Q11b** Would like clarification on proposed thresholds and states they do not relate directly to those set out in the Development Management Regulations 2015.  
**Q12** Agrees with Preferred Option but suggest that the overarching tourism policy could be in conflict with the proposed policy for RDAs.  
**Q14** Agrees with Preferred Option but notes that there may be potential conflict between these areas and RDAs where the designation could overlap.  
**Q16** Agrees with Preferred Option.  
**Q16b** Agrees with Preferred Option.  
**Q27** Vacant sites within the town centres should be zoned as opportunity sites and incorporate town centre living initiatives e.g. LOTS  
 No comment made on remaining questions.

**Summary of Comments received from NIHE (Supplementary Statement)**

NIHE endorses the overarching principles set out in the FODC LDP. Under the heading, 'Design led approach', they advocate that a high quality design is essential in all developments and refers to PPS 7 Addendum Safeguarding the Character of Residential Areas for which NIHE has similar standards and also advocates the use of the Lifetimes Homes Standard, to provide housing suitable to meet the changing needs of the population, particularly the elderly.

**Future proofing and design to minimise energy usage and CO2 emissions**

- Energy efficiency should be delivered in a 3-tiered response, firstly to reduce demand, secondly to improve energy efficiency (more insulation) and finally provide renewables where applicable.

**Protect and enhance the natural environment**

- Maximise housing development on brownfield land and land within the urban footprint.

**High Quality Open Space**

- New development should usually conserve wildlife habitats, existing trees and quality vegetation and promote further biodiversity by providing open space with uncultivated areas and green corridors.
- New development should consider the creation of allotments and community gardens; planting of native species; promotion of tree-lined streets.

**Placemaking**

- NIHE supports LDP's commitment to a 'placemaking' approach. This allows a joined up method of working with other council functions such as regeneration, tourism, economic development and community planning.

### **Connectivity**

- Future housing developments should be concentrated in locations with good access to public transport, walking and cycling facilities
- Consideration should be given to the layout of a development so it maximises the number of homes within a short distance to the nearest bus stop
- Developments which reduce car dominance in local streets, encourage pedestrian and cycle journeys, make it safer for children to walk to school and play outside, should be promoted.

### **Windfall Sites and Unzoned Land**

- A policy should be included in the LDP to allow for windfall sites that may come forward during the plan period
- A policy should be included to allow for the flexible development of sites where, for example, the site is not zoned within the LDP, subject to criteria including sustainability of the site for the development proposed. This policy could also be applied where there has been a change in circumstance in relation to a zoned site.

### **Housing**

NIHE expressed disappointment at the lack of specific policies on housing issues in the POP. They provided comments on housing under the following sub-headings:-

#### Housing Land Availability

- Identify housing land which is readily available
- An assessment of "fitness for purpose" of existing zoned land should be undertaken, as for existing zoned economic development land.

#### Mixed Tenure

- Increase sustainability through building balanced communities where people from different backgrounds can live together, strengthening economic sustainability, community cohesion and reducing social exclusion
- Use of development management policy for the delivery of affordable housing through the LDP
- Housing delivered in mixed tenure developments should be 'tenure blind.'

#### Affordable Housing

- The LDP needs to recognise the range of housing tenures – social, intermediate and private
- A comprehensive affordable housing policy should be included in the Plan which sets out the policy approach in urban and rural areas.
- Definition of affordable housing should be as defined in the SPPS – social housing and intermediate housing

	<ul style="list-style-type: none"> <li>• Use of development management policy, similar to HOU2 in the current Northern Area Plan. Wheelchair Housing</li> <li>• Given increasing numbers of people with a disability, the LDP should seek to support housing that caters for the needs of wheelchair users by ensuring that a minimum of 5% of private units within major developments are designed to wheelchair standard. There may need to be different thresholds in FODC.</li> </ul> <p><b><u>Developer Contributions</u></b></p> <ul style="list-style-type: none"> <li>• NIHE strongly supports the LDP overarching principle requiring developers to bear the cost of work required to facilitate development</li> <li>• Supports introduction of developer contributions policy for provision of affordable housing Supported Housing</li> <li>• Supported housing is for individuals who cannot live independently in their own home. This can be self-contained or shared accommodation.</li> <li>• A development management policy for supported housing should be included in the LDP</li> </ul> <p><b><u>Carried Forward</u></b></p> <ul style="list-style-type: none"> <li>• In reference to PED 7 of PPS 4, requests that consideration be given to amending this to allow for residential development on appropriate sites</li> <li>• Welcomes retention of PPS 21, particularly policy CTY 5, to allow for the development of small groups of affordable housing.</li> <li>• Welcomes retention of PPS 8. Would welcome acknowledgment that social housing is a “substantial community benefit” under policy OS1</li> <li>• NIHE thought that PPS 12 Housing in Settlements had not been brought forward. This is not the case.</li> <li>• Strongly supports measures in the Plan to support good design and place-making. Requests that in addition to Living Places and Building on Tradition that Creating Places and the DCANs should also remain as material considerations in the assessment of planning applications. Lifetime Homes Standard and Secured by Design Standard should also be included. Suggests that a comprehensive review of policies contained within the design guidance highlighted, should be carried out to clarify and bring together those aspects which the Council wishes to retain.</li> </ul>
<p><b>SONI</b></p>	<p>SONI supports and welcomes the Council’s strategic economic objective in the POP: “(v) To accommodate investment in public utilities infrastructure, and waste management.”</p>

	<p>Referred to PRE-POP submission in June 2016 which includes information on the indicative nature and extent of future developments in the Council area. (See Pre-Pop comments/insert table etc)</p> <p>RDS contains policies which could form the basis of new policies and objectives in the LDP, including ‘RG5: deliver a sustainable and secure energy supply’.</p> <p>SONI have provided the following suggested text for inclusion in the LDP:  <i>“Northern Ireland needs a robust and sustainable energy transmission and distribution infrastructure network. This infrastructure will deliver reliable and secure sources of electrical energy to communities and businesses across the Region and improve connectivity with and linkages to areas outside the Region.  The planning and development of Grid infrastructure by SONI over the period of the Plan (including the provision of new infrastructure, works proposed to strengthen the existing grid and the development of Smart grids) are recognised as key to achieving this objective and are supported in this Plan.  New energy infrastructure must be carefully planned and assessed to avoid adverse environmental effects, particularly on or near protected sites and areas of landscape sensitivity where possible including AONBs. At the plan level this will require a Strategic Environmental Assessment; at the project level this may require an Environmental Impact Assessment and a Habitats Regulation Assessment to identify effects and appropriate mitigation.  This will ensure that the Fermanagh and Omagh Council area develops and maintains a safe, secure, reliable energy infrastructure network which in turn will ensure the area has access to reliable sustainable energy supplies to support economic growth and connectivity. It will also assist in maximising the area’s significant renewable energy resource.  This will support the realisation of policies and objectives in the Regional Development Strategy 2035.”</i></p> <p>SONI comment that it is unnecessary to reference the need to comply with ICNIRP, as this is already a recognised requirement beyond planning.</p>
<b>Invest NI</b>	<p>Invest NI provided some general comments on the POP as a whole, augmented with specific replies to appropriate elements of the questionnaire.</p> <p><b><u>General Comments</u></b></p> <ul style="list-style-type: none"> <li>• Argues that the requirement for developers to bear the cost of work required to facilitate development proposals (7<sup>th</sup> Overarching Principle) should not apply to public sector developments where wider societal benefits are the driving force rather than profit. Such additional cost also has the potential to adversely affect project deliverability.</li> <li>• Points out that the statement in paragraph 5.18 of the POP, is an inaccurate representation of Invest NI’s position, in that they only intervene in the commercial property market to buy and develop land where the private sector is not willing to do so, and not that they specifically require additional land for their clients.</li> <li>• Welcomes the carrying forward of the existing provisions of PPS 4 Planning and Economic Development.</li> </ul> <p><b><u>The Vision and Strategic Objectives</u></b></p>

- In relation to the number of jobs to be created, it would be useful for the Council to elaborate further on these and how they envisage this target is to be achieved and whether they are across growth sectors or the economy as a whole.

#### **Economic Development Land Allocation**

- Notes the Council's preferred option and the potential for new employment zonings that the proposed A4/A5 upgrades may release.

#### **Development in the Countryside**

- Agrees with preferred option.

#### **Economic Development – Addressing Deprivation/Regeneration in the Urban Areas**

- Notes the quantum of land the Council intends to zone for industry and business and additionally identifying vacant or underused land in disadvantaged areas in the two main towns. Seeks a definition on the terms “vacant” and “under used”. Invest NI would not consider its land within the Plan area to be either vacant or under used.

#### **Economic Development – Addressing Deprivation/Regeneration in the Rural Area**

- Comments are a duplication of those made to Main Issue 5 and do not therefore specifically address this issue.

#### **Integrated Renewable Energy and Passive Solar Design**

- Seeks clarification on paragraphs 9.16 and 9.17 (LDP comment - this is self-explanatory to anyone reading it) and what the Council envisages as public sector development. Again, concerned about impact on developments where wider societal benefits are the driving force rather than profit.
- Also requests clarification in relation to thresholds and the type of developments they would apply to. Considers that separate thresholds for different types of development may prevent imposition of an over-onerous constraint.

#### **Supporting Good Design and Place Making**

- Agrees with Council's preferred option.

#### **Carried Forward Planning Policies**

- In relation to town centres, considers that the town centre boundary in Omagh should be amended and that areas excluded from development by PPS 15 should be provided for elsewhere.



	<ul style="list-style-type: none"> <li>• Supports the re-use of buildings within settlements for modern business purposes. Employment generated from these can bring new footfall and add vibrancy to the retail and hospitality business in the town centres.</li> </ul>
<b>Department for Communities - Ministerial Advisory Group (MAG)</b>	<p>The response relates to specific questions in the POP which relate to Architecture and the Built Environment. MAG would welcome the opportunity to meet and discuss further any of the points raised.</p> <p><b>Q1</b> In relation to the Vision, comments that it is brief and whilst there is great emphasis on sustainability, more is required about Sustainability Transport and Active Travel. The Strategic Objectives are clear and comprehensive.</p> <p><b>Q3</b> Does not agree with preferred option for Spatial Growth Strategy. Considers it is unbalanced to allocate 3,114 houses to the two main hubs and 1,407 to the countryside. The allocation for smaller towns, villages and small settlements provides for good design, connectivity and linkage. None of the options take account of improving the settlements that are already in place.</p> <p><b>Q6</b> Does not agree with preferred option for sustaining rural communities. Considers that further more detailed analysis would be required. Option 2 should mention policies to control siting, design guides and development control advice notes.</p> <p><b>Q8</b> Does not agree with preferred option for addressing deprivation/regeneration in rural areas as needs further detail on the proportion of the countryside. Option 2 is preferred option and suggests examples of types of small businesses and business use classes compatible with housing and surrounding rural area.</p> <p><b>Q16</b> Broadly in agreement with Option 3 regarding supporting good design and place making and offers additional points for consideration and further discussion e.g. the beneficial impacts of good standards of civic stewardship in areas of low employment/multi-deprivation.</p>
<b>Derry City and Strabane District Council</b>	<p><b><u>Development in the Countryside</u></b></p> <ul style="list-style-type: none"> <li>• Notes the preferred option to designate tiers of Countryside/Rural protection areas and stricter policy control in sensitive landscapes.</li> </ul> <p><b><u>Economic Development</u></b></p> <ul style="list-style-type: none"> <li>• Notes the preferred option for deprived urban areas which will assist in the regeneration of such areas</li> <li>• The targeted approach to rural areas is considered a sound approach based on the supplied evidence.</li> </ul> <p><b><u>Mineral Development</u></b></p> <ul style="list-style-type: none"> <li>• Derry and Strabane faces similar issues in terms of minerals development and would concur with the preferred option.</li> </ul> <p><b><u>Renewable Energy</u></b></p> <ul style="list-style-type: none"> <li>• Agree with the preferred option to retain existing policy provisions but introduce a stricter policy regime in terms of</li> </ul>

	<p>protecting sensitive landscapes.</p> <ul style="list-style-type: none"> <li>• Also supportive of the preferred option for Integrated Renewable Energy and Passive Solar.</li> </ul> <p><b><u>Tourism</u></b></p> <ul style="list-style-type: none"> <li>• Supportive of all preferred options in relation to tourism.</li> </ul> <p><b><u>Supporting Good Design &amp; Place Making</u></b></p> <ul style="list-style-type: none"> <li>• Considers that the Living Places document is ‘light’ in its ability to deliver change but agrees the 10 qualities should be integrated into LDP preparation and policy. Supportive also of an integrated approach to supplementary planning design guidance by adjacent AONB councils.</li> </ul> <p><b><u>Carried Forward Policies</u></b></p> <ul style="list-style-type: none"> <li>• Notes the contents of this section.</li> </ul> <p>Concludes by advising of future consultation with FODC via ‘Adjoining Council Stakeholder Group’.</p>
<p><b>Mid-Ulster District Council</b></p>	<p>The following comments concern those matters considered to be of cross boundary interest.</p> <p><b><u>Minerals Development</u></b></p> <ul style="list-style-type: none"> <li>• MUDC welcomes the concept of the ACMDs and should the preferred option be chosen, that they work with FODC on the development of ACMDs which are contiguous across council boundaries.</li> </ul> <p><b><u>Renewable Energy</u></b></p> <ul style="list-style-type: none"> <li>• MUDC support the Council’s preferred option but feel it could go a step further by taking into account the potential detrimental impact that high structures such as overhead powerlines and telecommunications development, could have on our shared landscapes. MUDC considers that the Sperrin AONB and Clogher Valley are important shared landscapes. Again, they would welcome the opportunity to work with FODC on the development of ACMDs which are contiguous across council boundaries.</li> </ul> <p><b><u>Tourism</u></b></p> <ul style="list-style-type: none"> <li>• Welcomes the designation of Tourism Conservation Zones.</li> <li>• Considers that any Tourism Opportunity Zones should be focused on recognised tourism attractions and are sensitively located.</li> </ul> <p><b><u>Development in the Countryside</u></b></p> <ul style="list-style-type: none"> <li>• MUDC notes the approach to development in the countryside and the rationale for the preferred option.</li> </ul>

	<p><b><u>Economic Development – Addressing Deprivation/Regeneration in the Rural Area</u></b></p> <ul style="list-style-type: none"> <li>The approach to economic development is noted.</li> </ul> <p><b><u>Archaeology and Built Heritage</u></b></p> <ul style="list-style-type: none"> <li>Consideration should be given to linking with Beaghmore ASAI so that it extends into the FODC area.</li> </ul>
<p><b>Causeway Coast and Glens District Council</b></p>	<p>Causeway Coast and Glens (CCG) acknowledge the strategic nature of the Preferred Options Paper, and its purpose to stimulate focussed debate on a wide range of planning issues affecting the district.</p> <p>CCG agree with the options presented in relation to the Strategic Growth Options, and the main issues options. Within the Carried forward section a number of suggestions have been made in regard to The Control of Outdoor Advertisements, Telecommunications, and suggested primary retail cores for Enniskillen and Omagh.</p>
<p><b>SSE</b></p>	<p><b>Comments from JLL (Jones Lang LaSalle) on behalf of SSE Renewables</b></p> <p>Whilst some of the preferred options are supported, there are significant concerns regarding others which do not properly reflect important elements of extant planning policy and advice.</p> <p><b><u>Spatial Portrait and Regional Policy Context</u></b></p> <ul style="list-style-type: none"> <li>Due to the size of plan area and the low dispersed population levels, in principle, the area should aim to provide a major contribution to Northern Ireland’s renewables targets through an enabling framework. It is recommended that the spatial portrait within the LDP should recognise this as well as the fact that Northern Ireland has one of the best wind resources in Europe and accordingly has significant social, economic and environmental value that could be harnessed through the deployment of onshore wind.</li> <li>Considers that there is a protectionist policy approach in the POP with a presumption in principle that wind sites should not be permitted in sensitive landscapes such as AONBs. This is inconsistent with the aims of the RDS and its encouragement for further deployment of renewable energy development.</li> </ul> <p><b><u>The Vision and Strategic Objectives</u></b></p> <ul style="list-style-type: none"> <li>The ‘Social’ objectives should recognise that renewables development including onshore wind energy development can assist in providing opportunities for recreation and the delivery of local projects.</li> <li>In terms of Position Paper 7 Tourism and Paper 15 Development Pressure Analysis, it is noted that there is no identified pressure or perceived conflict between onshore wind energy development and tourism related land uses or interests.</li> </ul>

- The 'Economic' objectives should include the accommodation of investment in renewable energy development, alongside public utilities infrastructure. Both the SPPS and RDS acknowledge the economic benefits of renewable energy in terms of jobs and opportunities. Cites the proposed Doraville Wind Farm 'Doraville Area Grant Scheme' as a means to enhance the tourism and recreational economy as the Grant Scheme seeks to fund the 'Sperrins Outdoor Recreation Action Plan'.
- The 'Environmental' objectives should support new development which contributes to meeting climate change targets. The RDS and SPPS both recognise that renewable energy reduces dependence on fossil fuels and helps achieve targets for reducing carbon emissions.
- Seeks a more supportive policy framework for onshore wind energy development within the LDP.

#### **Spatial Growth Options**

- Recommends that the spatial strategy for the FODC area provides no form of moratoria on where onshore wind development can or cannot take place.

#### **Sustaining Rural Communities**

- Does not agree with preferred option. Considers that the existing policy framework which is proposed to be brought forward, as recognised in Appendix 2 to the POP, makes adequate provision for new development in the countryside and already allows for the character of the countryside to be taken into account in development management decisions.
- The preferred option adopts a protectionist approach to designate SCAs, RPAs and Remaining Countryside Areas. There is no evidence base to support this approach.
- The LDP would benefit from recognising that the development of onshore wind energy development can assist with the aim of sustaining rural communities.

#### **Addressing Deprivation/Regeneration in the Rural Area**

- Subject to their comments on Main Issue 4, the preferred option relating to this issue is endorsed, in so far as it supports appropriate economic development in the countryside generally. It is not accepted that the designation of SCAs should be taken forward.

#### **Overarching Policy for Renewable Energy Development**

- They object strongly to the preferred option (Option 2) and Option 1. Considers that there are significant inconsistencies between the Preferred Option, other objectives of the POP, the proposed policy approach set out within the Summary of Carried Forward Policies and the regional planning policy approach.
- Both Options 1 and 2 seek to introduce a blanket ban on new development consisting of wind energy, on landscape and visual grounds, which is inconsistent with PPS 18, the SPPS and RDS. They refer to Policy RE 1 of PPS 18 which presumes against development only where unacceptable impacts on specified resources would occur. There is no suggestion that area-wide prohibitions on development would be appropriate.
- Likewise, PPS Natural Heritage provides a criteria-based policy approach for the assessment of potential

	<p>development impacts on an AONB. It does not presume against any form of development within AONBs.</p> <ul style="list-style-type: none"> <li>• They consider that the way Position Paper 14 Landscape Character Assessment has been interpreted by Main Issue 8 is incorrect. This is further amplified in Appendices 1 and 2 of their submission.</li> <li>• It would be fundamentally contrary to the SPPS to impose a prohibition on wind farm development with no potential for the individual circumstances of any particular case to be taken into account as part of the policy.</li> <li>• The LDP should also embrace the advantages of Re-powering renewable energy projects. Maintaining low carbon renewable energy generation at existing wind farm locations where mitigation is proven is clearly highly desirable and is a concept supported in Scottish Planning Policy.</li> <li>• Allowing amendments to windfarm layouts, to support the co-location of other forms of low carbon generation or technologies which may increase the efficiency of an existing renewable technology should also be embraced and built into policy and guidance to enable more efficient, lower cost, stable energy generation in the future through the later inclusion of increased efficiency technologies.</li> <li>• Recommends that the LDP should seek to provide an enabling policy framework in all respects to assist the further deployment of wind energy development and that the LDP should retain the existing policy approach set out in PPS 18.</li> </ul> <p><b><u>Overarching Tourism</u></b></p> <ul style="list-style-type: none"> <li>• They do not support the Preferred Option and presenting one option without any alternatives is inappropriate.</li> <li>• To apply Tourism Conservation Zones without a proper evidence base could be detrimental to the economic development of the plan as a whole.</li> <li>• Makes reference to 'Wind Farms and Tourism Trends in Scotland: A Research Report (July 2016, Biggar Economics)' which concluded that wind farms do not cause a reduction in tourism employment at both a local authority and national level.</li> <li>• Points out that Position Paper 7 Tourism does not recognise a specific conflict between developing the tourism economy and the further deployment of onshore wind energy development.</li> <li>• Recommends that Tourism Conservation Zones should not be developed and instead, a policy approach that recognises how recreation and tourism interests can be enhanced by appropriate development proposals should be progressed.</li> </ul>
<b>Gaelectric</b>	<p>The FODC Preferred Options paper will be highly damaging to the future of wind energy in the district and will put at risk attaining the 40% SEF target and impact on the positive economics arising from wind development.</p> <p>Strategic importance of promoting the generation of energy through renewable sources and reducing greenhouse gas emissions is firmly established within policy and is further strengthened by the UK's ratification of the Paris Agreement.</p> <p>Strategies include:</p> <ul style="list-style-type: none"> <li>• UK renewable energy strategy 2009 and National Renewable Energy Action Plan 2010 – strategy states that there</li> </ul>

needs to be an increase in the use of renewable electricity, heat and transport. It sets out the path to meet the target to ensure 15% of the UK's energy comes from renewable sources by 2020

- NI Strategic Energy Framework (SEF) 2010 – target to increase the amount of energy consumption from renewable sources to 40% in Northern Ireland by 2020. The achievement of this target requires significant investment in renewable energy infrastructure.
- RDS – development of Northern Ireland's renewable energy sources is vital to increase its energy security, help combat climate change and achieve the renewable energy targets.

Renewable energies, in particular wind energy, have a key role in:

- Enhancing the competitiveness and attractiveness of Northern Ireland as a region to do business and invest in. Infrastructure is a key determinant for investors (foreign and indigenous) when it comes to making investment decisions.
- Helping safeguard the security of our energy supply system and maintaining network reliability; promoting sustainable development and harnessing the natural resources that the area has; along with the
- Wider environmental, economic and social benefits of all proposals for renewable energy projects (to include: job creation, cleaner energy, community funds, tourism potential etc.)

### **Vision and Strategic Objectives**

Are generally in agreement with the vision and strategic objectives however consider they could be broadened and strengthened as set out below:

**Social Objectives** -Renewable projects, especially wind farms have significant social benefits in sparsely populated, economically disadvantaged areas e.g. through local employment during and after construction phase. Gaelectric have referenced Slieve Kirk Wind Park as an example, citing a contribution of £36 million to the local economy supporting local businesses, jobs and enterprises. Community funds contribute to social and community services in the form of grants to local clubs and societies which act as important social outlets for what are often remote rural areas.

**Economic Objectives** -Renewable projects have the potential to stimulate enterprise and employment in the most 'deprived' areas particularly during construction phase. Wind farms can improve physical connectivity through works to improve the public road infrastructure in the areas in which they are located. Wind farms have provided significant economic stimulus to Northern Ireland. In 2012 1,300 people were employed in the wind industry which is expected to rise to 2,000 by 2020. It is estimated that 49% of the capital spend of wind farms is kept in Northern Ireland. This translates to an investment of £1.18m/MW of wind farms installed into the Northern Ireland economy over development, construction and operational stages.

Gaelectric set out the wider benefits of wind energy to Northern Ireland in relation to rates payments, community benefit, reduction in wholesale electricity with wind energy displacing fossil fuel driven technology, and the benefit of enhanced

security of supply for the Northern Ireland consumer, and an indicated £61.5m boost to the NI economy.

### **Spatial Growth Options**

Gaelectric agree with the preferred spatial growth option and comment that renewable projects have an important role to play in revitalising small towns and villages in the form of community funding and associated economic activity. They suggest that a renewable energy hub such as the new maintenance centre in Coleraine could provide opportunity in one of the two main towns for major employment. Gaelectric advise that there is over 150MW of wind in operation in the FODC area with a number of projects in construction and other unimplemented permissions.

### **Housing Allocation**

Gaelectric do not agree with the Council's preferred option, instead indicating that it would be more appropriate to focus on the main hubs in line with the RDS. This would allow the construction of houses close to existing services and infrastructure.

### **Economic Development Land Allocation**

Development that is weighted towards the hubs whilst not omitting rural areas is a sensible approach. There are a number of renewable energy companies working in Omagh which could be leveraged with the creation of a centre of excellence potentially in collaboration with SW College in Omagh who currently offer renewable energy courses. Wind farm operators are in demand in the North and Omagh is centrally located to take advantage of this form of employment.

### **Development in the Countryside**

Gaelectric do not agree with the Council's preferred option. They consider that the identification of SCAs would introduce a constraint which would unnecessarily rule out potential development in rural areas. Adoption of this approach could impede the successful allocation of economic land outside of the hubs.

It could have the effect of ruling out existing operating sites for repowering in the near future when the current turbines are past their design life which would impact on NI's targets laid out in the Strategic Energy Framework.

This would have a detrimental effect on the further development and strengthening of the electricity grid which would be contrary to the RDS.

### **Economic Development: Addressing deprivation/regeneration in rural areas.**

RPA/RCA/SCA designation is unduly restrictive to wind energy development as the resource is typically of a higher quality in more remote rural areas.

### **Overarching Policy for Renewable Energy Development**

Do not agree with the Council's preferred Option. The SPG gives clear national guidance on the siting of wind farms in the landscape and should be maintained as the reference document on landscape issues. Detrimental impact on both new and old wind farms being repowered with the knock on effect of losing clean energy generation in contravention of the Strategic Objective to promote positive action on climate change.

### **Integrated Renewable Energy and Passive Solar Design**

Agree with the preferred option and consider that a threshold of 500m<sup>2</sup> should be applied.

### **Overarching Tourism**

Do not agree with the preferred option. Adding further landscape protections for tourism could rule out suitable areas for new wind farms and repowering of older projects which would impact on achieving renewable targets.

### **Operational Tourism**

Gaelectric have indicated that community funding from wind farms have been a source of funding for tourism, both directly and indirectly. Examples of local communities seeking to make their area more attractive to tourists.

Do not agree with the preferred option for operational tourism.

Wind farms and tourism can exist together for mutual benefit as demonstrated in Scotland. Working together FODC and renewable developers could develop a similar scheme that benefits rural areas that are often overlooked.

A visitor centre on a large wind farm would be a positive contribution to FODC tourism objectives.

### **Supporting Good Design and Place Making**

Do not support the Council's preferred option. Gaelectric state that " The overarching policy SPPS states 'Design is not limited to the appearance of a building or place but should also encompass how buildings and places function in use and over the lifetime of development....including how the design of a development can minimise energy and water usage and CO2 emissions'. "

Wind farms and renewable energy projects in general reduce CO2 emissions by their very nature as they displace polluting fossil fuel power plants. The preferred policy option on this issue seeks to rule out further areas for wind farm development by placing stricter limitations on developments in the Sperrins, conservation areas etc. There is no need for additional supplementary planning design guidance for the Sperrin AONB in conjunction with adjoining AONBs as the SPG is already in place.

### **Planning, Archaeology and the Built Heritage**



	<p>Q17 – Any further areas for designation as an ASAI? PPS 6 and the SPPS are working well in this respect.</p> <p>Q18 – Areas within or adjoining settlements which are of great amenity value, landscape quality or local significance and therefore worthy of designation as an LLPA? No – PPS 6 and the SPPS are working well in this respect.</p>
RES	<p><b><u>The Vision and Strategic Objectives</u></b></p> <p>RES agrees with the vision and strategic objectives. Particular comment is made in respect of the explanation of the vision in para 4.2 which sets out the Council's aspiration <i>to have an economy that will have been strengthened and grown through the embracing new technologies, encouraging investment in higher paying industries and improving our tourism base</i> in that RES are renewable energy and in particular wind energy can play a pertinent role in fulfilling this objective.</p> <p>RES encourages the Council to have regard to this wider benefit in consideration of proposals for renewable energy. The also reference the contribution that wind energy makes to the tourism industry.</p> <p>RES welcomes the promotion of good education. RES provides an accessible education resource for schools. Lough Hill and Lendrum's Bridge wind farms are used annually for school tours.</p> <p>RES welcomes the FODC position that any negative effects of climate change brought about by increased energy use will be minimised, with a greater reliance on renewable and low carbon sources.</p> <p>RES could encourage the council to make provision within the plan to facilitate adequate energy infrastructure, and in particular energy from renewable sources to meet the needs of the planning population growth.</p> <p>Plan policies should be framed to facilitate energy from renewable sources, to help Northern Ireland, and in particular FODC, reduce its use of key resources like energy and become less dependent on imports of oil and gas.</p> <p><b><u>Strategic Objectives</u></b></p> <p>Social - Renewable sector is a catalyst for investment and jobs, which will aid the provision of vibrant communities. RES encourage the Council to have regard to the role that renewable energy can play in sustaining our communities and ensure that plan policies provide onshore sufficient opportunities for wind and other renewables.</p>

Economic - RES encourages the Council to have regard to the key role the renewable industry can play in meeting the Council's strategic objectives of facilitating the creation of 4,875 new jobs by 2030 and promoting diversity in the range of jobs in the district. Onshore wind development makes a substantial contribution to the local economy in terms of job creation, sustaining employment and financial contributions. RES welcomes the FODC commitment to accommodate investment in public utilities infrastructure, and waste management.

### **Environmental**

In general terms RES welcome the environmental objectives and set out the role of the renewable energy sector in addressing and mitigating climate change. RES welcomes FODCs commitment to making climate change and sustainability one of its key strategic objectives.

Whilst RES strongly welcomes the header text within the 'Environment' strategic objective, that cites promotion of climate change, RES are concerned that the amplification has been framed in a limiting way. Greater weight is being applied to protection of physical and visual existence of existing resources, with less emphasis being placed on actually promoting proactive development to tackle climate change –provision ought to be made for this in the language used in the plan, to encourage beneficial forms of development such as wind farms and other types of renewable energy, and thereby enable certain development to take place over the limitation on certain resources.

### **Renewable Energy**

RES welcomes that Renewable Energy is recognised as a main issue in the Preferred Options Paper.

The renewable energy sector has a vital role to play in respect of the plans strategic objectives. RES have significant concerns with the baseline information cited in the POP as influencing the initial draft policy options and the supposition that extant targets have been met. The LDP is intended to provide overarching planning policy to at least 2030; it is therefore wholly insufficient to develop policies for the duration of the plan period based on these outdated targets (PFG 2011-2015 and SEF 2010-2020). RES would encourage the Council to adopt a more sustainable policy approach: To consider the current and projected energy usage and work towards a zero carbon approach.

The interim 2020 targets do not impose an upper limit, but rather place a minimum threshold that must be met by the member states to fulfil the UK's obligation to off-set the use of fossil fuels and work towards delivering the global climate change agenda. The LDP should be striving to exceed these minimum targets and promote a best practise model. RES would encourage the Council to proactively consider the relationship between their spatial growth strategy and energy consumption over the plan period.

The UK Energy Act, a legislative framework for delivering secure, affordable and low carbon energy and includes provisions on decarbonisation, electricity market reform, nuclear regulation and consumer protection. The act discusses the UK's obligation to increase the use of renewable sources and reduce carbon emissions and amalgamates the individual energy regulations of England, Scotland, Wales and Northern Ireland.

The PFG 2020 target of 20% of NI electricity from renewable sources being merely the first of a series of targets for energy generation. The base line fails to take account of the UK Climate Change targets for emission cuts, which seeks a 40% reduction in emissions by 2020, rising to 80% in 2015. RES would therefore encourage the Council to give broader consideration to the wider climate change agenda.

The Investment Strategy Northern Ireland 2011 highlights the importance of renewable sources in electricity generation.. The Council's attention is also drawn to The Onshore Renewable Energy Action Plan 2013-2020 plan. This recognises the significance onshore wind has in contributing to NI renewable energy resources. The action plan was intended to assist the outworking of the 2020 target. It is not an upper limit, but rather a starting point to work towards the aspirations of the Climate Change Act.

RES are particularly concerned that the Council are seeking to under plan for energy consumption throughout the plan period by simply relying upon the PfG 20% renewable energy target. RES would highlight that this approach conflicts with the Strategic Objective 3; to promote positive action on climate change in that it doesn't promote steps to actively tackle climate change.

They refer to previous decisions by the Planning Appeals Commission where the adjudicated on whether the 2020 target ought to be relied upon as a limiting threshold. The PAC found that the 40% target should be seen as "rolling targets and not ones to be capped upon achievement".

RES would encourage the Council to have regard to the approach taken by the ROI – see White paper (Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR)) which identifies reductions of 80% to 95% by 2050 and 100% reduction by 2100. Encourage the Council to consider a more ambitious target to reflect the anticipated strategic long term targets that are likely to be introduced in NI over the plan period.

#### **Current Renewable Provision**

RES would encourage the Council to fully reflect its strategic objectives by promoting a proactive approach to tackling climate change through encouraging renewable energy proposals to off-set fossil fuel use. The plan has a duty to provide flexibility to ensure on-going supply of renewable energy. A number of wind-farms in NI have now been operational since around 2000 and are coming to the end of their consented lifetime.

If decommissioning is not factored into planning policies it could result in a substantial deficit in supply in the plan period. RES recommends that the Fermanagh and Omagh LDP embrace the advantages of Re-powering renewable energy projects. FODC should consider a positive planning policy that supports the redevelopment and expansion of existing wind farm sites.

#### **Deliverability of Renewable Projects**

RES suggest that there is an inference in referencing the closure of the Northern Ireland Renewables Obligation that the plan does not need to provide for new development proposal. RES strongly urge the Council to ensure appropriate provision is made within the LDC for the proceeding 14 year plan period, notwithstanding the closure of the NIRO subsidy.

#### **Plan Policy Options**

RES are supportive of the current planning policy regime and what is set out within the SPPS, which are reflective of the SEF and RDS.

Council should reflect the aspirations of the SPPS in the LDP policies: To facilitate the siting of renewable energy generating facilities in appropriate locals within the built and natural environment in order to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance. RES would encourage FODC to reflect the criteria based approach to renewable energy generation contained within the SPPS in the LDP as it contains a robust assessment whilst allowing the flexibility for each application to be assessed individually whilst also taking potential cumulative impacts into account.

RES do not agree with either Option 1 or 2 for overarching policy as set out in the POP. They consider a spatial framework to be unnecessary (option 1), and do not consider there to be a need to introduce a stricter policy as the existing policy is sufficient.

RES agree that portions of the district have experienced significant development pressure, particularly from the approval of single turbine development. RES believe that current policies within the SPPS and PPS18 provide ample protection of these areas but ensuring that sensitive landscape are protected and that a full and robust cumulative assessment is undertaken – the SPPS only permits development of wind farm sites in sensitive areas where the need outweighs the environmental impacts.

RES highlight the obligation on FODC to produce a plan that is in general conformity to the Regional Development Strategy and to the SPPS. Programmes and policies underpinned by the rule of law provide greater certainty for investors, reducing risk and therefore the cost of capital which drives cost efficient investment for the benefit of industry and ultimately consumers. RES are firmly of the view that the most appropriate mechanism to achieve soundness is for the renewable energy policies to reflect the policies provided within the SPPS.

<b>ESB Wind Development</b>	The response was received by email after the deadline for the receipt of representations. The content of the submission reflects similar views to those from SSE Renewables in that they do not support the preferred options for renewable energy, that proper account has not been taken of the SPPS and a stricter policy for wind energy development in sensitive areas is not in keeping with the SPPS and the existing policy approach contained in PPS 18 should be retained. Reference is also made for the need to embrace the advantages of re-powering renewable energy projects.