

## Fwd: The Fermanagh and Omagh Local Development Plan (LDP) Draft Plan Strategy - Consultation on Proposed Changes

Tue 24/11/2020 22:11 [REDACTED]@gmail.com>

To: Development Plan <developmentplan@fermanaghomagh.com>;

Cc:

📎 1 attachments (28 KB)

BCA-Response to Fermanagh and Omagh Draft Plan Strategy Nov 2020.docx;

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Please see attached the response from Boho Community Association to the Local Development Plan.

We did make a response before but received no reply and later found out from a note on the Council website that this was due to the numbers of responses received. As each DRC had sent a representative to a meeting with LDP staff in the Townhall and then each DRC had made written representation, we feel that we should have had a response as we were reflecting the views of a number of people from our areas and on behalf of our local community associations.

We do feel we have made a valid response this time and that Council should be replying to the DRC's who have been adversely affected by the new draft plan.

I am also copying this to our local Councillors and the Director of Community Health and Leisure for their information.

Decisions made now in respect of this plan will have an affect on the next generation in our District and on Fermanagh DRC's in particular, so careful consideration of the situation we find ourselves in now with covid and its aftermath on how we live and work in the Countryside should be given credence.

Public trust in the LDP process has been damaged by recent revelations around wording changes not approved by Council and until this has been investigated and proven that this cannot happen again, local people will find it difficult to believe their interests have been taken on board and are being listened to.

When our DRC's met with the LDP team a few years back in the Townhall, we were told by the LDP team that the DRC's had to go, as Omagh didn't have them so Fermanagh couldn't have them, The decision should not be a Fermanagh versus Omagh decision, but one which reflects the needs of our area, and not the opinions of any officer.

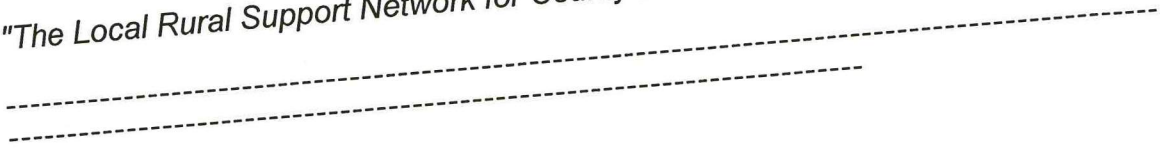
I would be grateful if this submission could be accepted and confirmation emailed that it has been logged and will be included/considered as the LDP moves to its' next stage.

Kind regards

[REDACTED]

On behalf of Boho Community Association

*"The Local Rural Support Network for County Fermanagh"*



## **Dispersed Rural Communities within Fermanagh and Omagh District**

Boho Community Association remains concerned that the current designations for Dispersed Rural Communities will not be retained in the new development plan. The current DRCs are;

- Aghadrumsee
- Aghakillymaude
- Boho
- Cashel
- Coa
- Cooneen
- Corraney
- Derrygannon
- Knocks
- Mullaghdun
- Mulleek

This designation has enabled these communities to gain planning approval for various developments in recent years eg a community hall, an extension to the hall, a community playpark and toilet and playing field. Boho also benefitted from a small development of rural social housing which has been full since it was built.

Boho Community Association welcome the introduction of Rural Community Areas as a means of sustaining rural communities and acknowledge that these designations may be part of the Local Policies Plan stage.

It is important that these existing DRCs either remain designated as Dispersed Rural Communities or are included as Rural Community Areas. Boho Community Association would draw the Councils attention to RG6 of the Regional Development Strategy (RDS) Strengthen Community Cohesion policy, which aims to foster a stronger community spirit and sense of place. Did the council take account of the Regional Development Strategy? (C1) The dispersed rural communities are an accepted and widely known designation and there seems to be no reason to change this name when it has worked and been widely used in the District and enabled communities to avail of funding to deliver important community infrastructure.

## **Mid Ulster Council Designation of DRCs**

Boho Community Association previously highlighted Mid Ulster Council Draft Plan Strategy Policy SPF 7 which aims to support rural regeneration in more remote areas through the designation of Dispersed Rural Communities (DRCs). This policy retains the current DRCs;

*'These areas contain dispersed communities with a strong sense of identity. There are currently three Dispersed Rural Communities (DRC's) within Mid Ulster at Broughderg, Carntogher and Sixtowns and these are retained within this Plan Strategy and they are identified on the District Proposals Map'.*

Furthermore, Mid Ulster Council may designate further DRCs at the next stage in the development plan process;

*'In preparing the Local Policies Plan consideration will be given to whether there are other locations in our District which could be defined as a DRC'.*

Mid Ulster Draft Plan Strategy also provide criterion on which DRCs are identified namely;



- *areas experiencing low development pressure away from existing towns;*
- *association with a traditional focal point, where there is convincing evidence of local community activity; with the existence of social and recreational facilities, such as a church, hall, school, community centre or sports club;*
- *presence of other facilities or services, such as a shop, public house or sewage treatment works;*
- *a strong community identity. This could manifest itself through a local community association, church organisation or sports club; and*
- *a locally significant number of dwellings that have been built over time*

This criterion is equally relevant to the DRCs within Fermanagh and Omagh District Council as our DRCs have fostered a strong sense of identity which may be demonstrated by the various community groups including;

- Aghadrumsee Community Group
- Aghadrumsee Primary Parent Teacher Friends Association;
- Aughakillymaude Community Association;
- Boho Community Association;
- Cashel Community Association;
- Coa Community Group;
- Cooneen/Coonian Community Development Association;
- Derrygannon Community Association;
- Knocks Community Association;
- Mullaghdund Community Association;
- Mulleek Community Association

These groups, and others, run various activities within DRCs and contribute to social cohesion in these areas.

Given Mid Ulster Council's consultation only recently closed on 24 September 2020 Boho Community Association would query the soundness of Fermanagh and Omagh's Draft Plan Strategy. 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? (C4) If we already have DRC's why remove this designation and replace it with a lesser one. DRC's are part of the hierarchy of settlements and RCA's will not be, in effect you are reducing the importance of DRC's and removing them from the map. If other council areas are now adopting DRC's there is no legal reason why FODC cannot keep this designation as the areas who are DRC's have a strong local identity of covid 19, Council should be supporting the rural, rather than seeking to make unnecessary changes to terminology which could be detrimental to the area and its future development.

### **Draft Policy HOU17: Affordable Housing**

Boho Community Association welcomes the increase from 6 to 8 dwellings as this provides for more affordable housing within the district and particularly in rural areas. This could be increased to more than 8 dwellings as per PPS 21 CTY 5 which allows for a group of no more than 14 dwellings adjacent to or near a small settlement or within a designated Dispersed Rural Community to provide social and affordable housing to meet the needs of the rural community. It is often more economically viable to build a larger development and some of the larger DRCs may be able to accommodate this. Indeed, the SPPS states the appropriate number of social/affordable dwellings permissible will depend upon the identified need and the requirement to ensure the development is sited and designed to integrate



sympathetically with its surroundings. Did the council take account of policy and guidance issued by the Department? (C3)

Indeed, there have been representations to the Mid Ulster Draft Plan Strategy that state that the limit of 14 dwellings may be restrictive and instead should be assessed on a case by case basis. It is important that Fermanagh and Omagh LDP considers the policies in adjoining districts (C4).

It is evident that there is a need for social and affordable housing within the Fermanagh and Omagh District. Fermanagh and Omagh is primarily rural, with approximately 30% of the population living in the two main towns of Enniskillen and Omagh, which means that 70% of the population live in either small towns/village/rural communities or in the open countryside. It is imperative that this 70% are heard and there is full engagement with communities. In rural areas, housing needs can be hidden or dispersed, and community groups are often more aware of needs of their community. Boho Community Association had previously noted that the sites within Rural Community Areas had been removed from the sequential test, so we welcome the inclusion of 'a site within a Rural Community Area' as part of the sequential test in assessing the acceptability of sites outside a village or small settlement. Boho Community Association are encouraged that the inclusion of a site within a Rural Community Area means that the existing Dispersed Rural Communities will be retained and there may be possibility of further designations.

Boho Community Association would also like to draw the Council's attention to the announcement on NIHE reorganisation which will enable the NIHE to borrow money and use said money for the building of social housing. The Housing Executive welcomes the identification of Rural Community Areas, as a means of sustaining rural communities<sup>1</sup>. Regular engagement with our local rural community means that we have in-depth knowledge of local opinions and where this hidden need is located. It is imperative that the existing Dispersed Rural Communities can avail of the opportunity to build houses for people that would choose to return to the area also (CE4).

Boho Community Association welcomed the earlier inclusion of a formally constituted Rural Development/Community Association applying for affordable housing. This allowed communities with local knowledge of housing need in their immediate area to contribute to assisting people with affordable housing. The response from Boho Women's Group to the Draft Plan Strategy refers to the hidden need for housing in Boho and this links back to the SPPS reference to identified need. The consultation response from the Department for Communities highlights this;

*The Draft Plan Strategy references to the provision of "affordable housing need" as measured by the Housing needs Assessment (see Paras 3.4, 3.5 (a)(ii), 3.11, 3.12, 3.61). For clarity, it might be useful to note that the NIHE Housing Needs Assessment only covers social housing need and that affordable housing also includes the provision of intermediate housing.*

Community groups are often more aware of needs of their community, both for social housing and intermediate housing. Did the council take account of its Community Plan? (C2)

Boho Community Association also notes the response from the Department for Communities which points to the need for the LDP to be written to accommodate further guidance on the definition of affordable housing.

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<sup>1</sup> Draft Plan Strategy Response 115 -Northern Ireland Housing Executive -December 2018



*Draft Policy HOU17 limits the provision of "affordable housing" to registered Housing Associations. The Department suggests that it would be prudent to future proof the Draft Plan Strategy by removing this limitation given that Department is planning a review of the definition of affordable housing, which could encompass a broader definition of intermediate housing. As such, the plan should allow flexibility in this regard.*

This could be significant in the future provision of said housing within rural communities. Is the plan reasonably flexible to enable it to deal with changing circumstances as it will be in place for many years before being updated? (CE4)

### **Draft Policy CF01: Community Facilities**

Boho Community Association support the amendment to specify that development of new or enhanced community facilities will be permitted within a settlement or, in association with a Rural Community Area, where there is a clear community need for such a facility and they: are appropriate in scale to the needs of the local community and reflect the character of the location. This is a clear acknowledgement of the advantages of Rural Community Areas or Dispersed Rural Communities in providing facilities within a largely rural council area.

Boho Community Association would query why in the case of a facility in association with an RCA, the use will be limited to a community hall only, as this may stifle the future potential for growth in these communities and provision of required facilities for residents within these communities in addition to a community hall, e.g. creche, day centre, health centre, recreation space, multiuse games area. This could be important in sustaining a rural community particularly if there is an aging population as in our District. Did the council take proper account of its Community Plan which highlights the ageing population? (C2)

### **Draft Policy RCA01: Rural Community Areas**

Boho Community Association support the additional clarification on the types of development within Rural Community Areas. This will allow community groups in these areas to apply for and promote workspace/business start-up units.

However, these additional employment and business opportunities may attract people to move back to the area. These people would need affordable housing and therefore it is imperative that this housing need is accommodated in order to sustain these communities. This may also be important due to a potential increase in home working as we recover from Covid 19. This recovery has the potential to regenerate our rural areas as never before but the LDP needs to be flexible enough to accommodate recent changes and future proofed to allow development so our rural communities can survive into the future. Is the plan reasonably flexible to enable it to deal with changing circumstances? (CE4)