

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

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To: Development Plan <developmentplan@fermanaghomagh.com>

📎 1 attachments (32 KB)

Fermanagh Rural Community Network Response to Fermanagh & Omagh Draft Plan Strategy Consultation on Proposed Changes.docx;

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Dear Local Development Plan Team

Attached submission from Fermanagh Rural Community Network to the Fermanagh and Omagh Local Development Plan (LDP) Draft Plan Strategy - Consultation on Proposed Changes.

If you require any further clarification or information please do not hesitate to contact us at Fermanagh Rural Community Network.

Regards

[REDACTED]
Fermanagh Rural Community Network
3 Queen Street
Enniskillen
Co. Fermanagh
BT74 7JR

Tel: 028 [REDACTED]

Or: 028 [REDACTED]

Email: [REDACTED]

"The Local Rural Support Network for County Fermanagh"

Local Development Plan
Planning Department
Fermanagh and Omagh District Council
Strule House
16 High Street
Omagh
Co Tyrone, BT78 1BQ

Dear Planning Department

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

Fermanagh Rural Community Network (**FRCN**) is the Local Rural Support Network for County Fermanagh.

FRCN is a membership based organisation with a Voluntary Board of Directors made up of representatives nominated and elected by rural community groups from each of the four geographical areas of County Fermanagh. Our Director's constantly work to ensure that the committee is both representative and cross community in make up.

Full Network Membership is open to all Rural Community Development Organisations and Affiliated Membership is open to all other community and voluntary sector groups. FRCN currently has a network of over 200+ Full and Affiliated members.

FRCN was formed in 1993 and is constituted as a Company Limited by Guarantee, registered with the Charity Commission for Northern Ireland and are recognised as a Charity by HMRC.

Fermanagh Rural Community Network on behalf of the rural communities which we represent, wish to submit this response to the Fermanagh and Omagh Local Development Plan (LDP) Draft Plan Strategy – Consultation on Proposed Changes.

Fermanagh's rural communities, particularly those eleven communities currently designated as Dispersed Rural Communities are concerned that the Local Development Plan Strategy is going to have major negative impacts on the long term future of their communities and that the needs of these communities are not being sufficiently considered or recognised as this strategy is being developed.

Fermanagh Rural Community Network wish to request that this submitted response is acknowledged formally and assurance is given that it will be considered as the Local Development Plan Strategy production process work timetable moves forward.

Fermanagh Rural Community Network
3 Queen Street
Enniskillen
Co. Fermanagh
BT74 7JR

Tel. No.: 028 [REDACTED]

Email: [REDACTED]

Dispersed Rural Communities within Fermanagh and Omagh District

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

- Aghadrumsee
- Aughakillymaude
- Boho
- Cashel
- Coa
- Cooneen
- Corraney
- Derrygannon
- Knocks
- Mullaghduin
- Mulleek

This designation has enabled these communities to gain planning approval for various developments in recent years. Fermanagh Rural Community Network 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. Fermanagh Rural Community Network 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)

Mid Ulster Council Designation of DRCs

Fermanagh Rural Community Network previously highlighted Mid Ulster Council Draft Plan Strategy Policy SPF 7 which aims to support rural regeneration in remoter 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, Carntogether 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, organise and deliver a wide range of social, educational, recreational and community activities within DRCs and contribute to social cohesion in these areas.

Given Mid Ulster Council's consultation only recently closed on 24 September 2020 Fermanagh Rural Community Network 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)

Draft Policy HOU17: Affordable Housing

Fermanagh Rural Community Network 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. Fermanagh Rural Community Network 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. Fermanagh Rural Community Network 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.

Fermanagh Rural Community Network 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 communities¹. Regular engagement with our rural communities in Fermanagh 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).

Fermanagh Rural Community Network 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.

¹ Draft Plan Strategy Response 115 -Northern Ireland Housing Executive -December 2018

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)

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

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? (CE4)

Draft Policy CF01: Community Facilities

Fermanagh Rural Community Network 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.

Fermanagh Rural Community Network 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. Did the council take account of its Community Plan? (C2)

Draft Policy RCA01: Rural Community Areas

Fermanagh Rural Community Network support the additional clarification on the types of development within Rural Community Areas. This will allow community groups in these areas 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 homeworking. Is the plan reasonably flexible to enable it to deal with changing circumstances? (CE4)