



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

## Fermanagh & Omagh Draft Plan Strategy Representations Form

Hard Copies of the Draft Plan Strategy are available for inspection during normal opening hours at the council's principal offices. The documents, electronic copies of this form, and our 'Guidance for Making Responses to the Plan Strategy' may be viewed at: <https://www.fermanaghomagh.com/>

### How to respond

You can make representations about the Draft Plan Strategy by completing this survey form, or if you prefer, you can fill out this form online.

For further assistance contact: [developmentplan@fermanaghomagh.com](mailto:developmentplan@fermanaghomagh.com) or Tel: 0300 303 1777; All representations must be received by 21st December 2018 at 12:00 noon.

### SECTION 1. Contact Details

Individual  Organisation  Agent  (complete with your client's details first)

**First Name**

CLIVE

**Last Name**

JOHNSTON

**Job Title** (Where relevant)

DEPUTY CHAIR

**Organisation** (Where relevant)

KILLYFOLE AND DISTRICT DEVELOPMENT ASSOCIATION

**Address**

LEANDER LODGE

224 DERNAWILT ROAD

**Postcode**

BT92 7BE

**Telephone Number**

**Email Address**

If you are an Agent, acting on behalf of an Individual or Organisation, please provide your contact details below. (Please note you will be the main contact for future correspondence).

**First Name**

**Last Name**

**Job Title** (Where relevant)

**Organisation** (Where relevant)

**Address**

  
  

**Postcode**

**Telephone Number**

**Email Address**

## SECTION 2. Representation

What is your view on the Draft Plan Strategy?

**Sound**

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below.

*(Continue on a separate sheet if necessary)*

**OR**

**Unsound**

If you consider the Plan Strategy to be **unsound**, please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6.

Soundness Test No:

- P1 Has the Draft Plan Strategy been prepared in accordance with the council's timetable and the Statement of Community Involvement?**



- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 Has the Draft Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 Did the council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?
- C1 Did the council take account of the Regional Development Strategy?
- C2 Did the council take account of its Community Plan?
- C3 Did the council take account of policy and guidance issued by the Department?
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 Does the Plan Strategy sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the Draft Plan Strategies of neighbouring councils?
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE3 Are there clear mechanisms for implementation and monitoring?
- CE4 Is it reasonably flexible to enable it to deal with changing circumstances?

**Plan Component - To which part of the Draft Plan Strategy does your representation relate?**

- |                        |   |
|------------------------|---|
| (i) Relevant Paragraph |   |
| (ii) Relevant Policy   | DE03 Sustaining Rural Communities<br>HOU17 Affordable Houses (Countryside)<br>RCA01 Rural Community Areas |
| (iii) Proposals Map    | Settlement Hierarchy Map  |
| (iv) Other             | N/A   |



## Details

Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

### Dispersed Rural Communities

Under the Fermanagh Area Plan (FAP) 2007 eleven communities were identified and designated as 'Dispersed Rural Communities' (p.82). These are Aghadrumssee, Aughakillymaud, Boho, Cashel, Coa, Cooneen, Corraney, Derrygannon, Knocks, Mullaghdund and Mulleek. The intention in designating these was to promote rural regeneration and provide scope for additional residential development and allow flexibility of small scale enterprise schemes. Killyfole DDA would assert that this has been largely successful as the majority of planning approvals within DRCs have been for single houses with a small number of applications relating to business/commercial development. When the Council consulted on the Preferred Options Paper one of the main issues that emerged was sustaining rural communities (p.2) so it is clear that this is an important issue within the district with people displaying a strong association with these areas as it forms part of their identity. Therefore, Killyfole DDA would emphasise the importance that FODC Plan Strategy takes account any representations made during the Prepared Options Paper stage (P2)

### Rural Community Areas

The FODC Draft Plan Strategy states that given that there is no draft policy within the Plan Strategy for DRCs this designation is no longer relevant (Table 3, p.306). Instead the FODC Draft Plan Strategy has referred to 'Rural Community Areas' (p.91) and they are defined as areas in the countryside which have a strong community identity and where existing social, community and recreational facilities such as a church hall, school, community centre or sports club act as a focal point for community activity. Killyfole DDA wants to ensure that at the appropriate stage in the plan process these 11 communities, identified in the FAP as DRCs, will be identified/named and included within new local development plan for FODC (C4). This designation is also important when applying for grants bringing much need finding into the area and acting as a catalyst for rural activity in our community and the other ten dispersed rural communities. Therefore, Killyfole DDA would attest that the FODC Plan Strategy strategies, policies and allocations are not realistic and appropriate having considered the relevant alternatives (CE1)

### PPS 21

PPS 21 Policy CTY 2 Development in DRCs resulted in this policy provision taking precedence over the Area Plan. However, CTY2 has been utilised on several occasions, for example; LA10/2016/1037/O -Site for 5 dwellings at Cooneen; and LA10/2016/1103/F -Playground, parking & toilet at Boho. PPS 21 outlines how some rural areas display symptoms of economic and social disadvantage and how in the interests of promoting regeneration the Department identified and designated DRCs. It is important that to Fermanagh Rural Community Network that these DRCs are identified and designated by the Council. Therefore, Killyfole DDA would state that the FODC Plan Strategy has not taken full account of the policy and guidance issued by the Department (C3).



Continued

### **SPPS**

The Strategic Planning Policy Statement (SPPS) is silent on what is defined as a focal point. FODC stated (Position Paper 'Sustaining Rural Communities' February 2016) this '*apparent relaxation of the policy test gives more scope for development of new dwellings in existing clusters, particularly given the extensive rural nature of the Fermanagh and Omagh district.*' This allows the Development Plan team to support suitable development in these areas. The SPPS further states that a regional strategic objective for tourism is to sustain a vibrant rural community by supporting tourism development of an appropriate nature, location and scale. Therefore, Killyfole DDA would state that the FODC Plan Strategy has not taken full account of the policy and guidance issued by the Department (C3).

### **Mid Ulster Council**

Mid Ulster Council state in their Preferred Options Paper (p.43) that DRCs tend to be located in countryside areas of low development pressure and could potentially sustain additional development. This would assist in the regeneration of that rural area. Mid Ulster Council are also giving consideration to designating more DRCs within the district. Their preferred policy states that '*a single dwelling in a Dispersed Rural Community will conform with the plan where the applicant has a strong connection to that community or where they make a substantial economic or social contribution to that community*'. Furthermore, '*a group of dwellings will conform with the plan where it represents a "clachan" style development of no more than 6 dwellings, located at a focal point i.e. Community Building or Cross Roads*'. The Mid Ulster policy also states that '*tourism and cottage industries will also be accommodated*'. Linkage to relevant plans, policies and strategies will be particularly important in helping to justify policies and proposals which reflect local circumstances pertaining to a council and its adjoining area. Killyfole DDA are of the opinion that the FODC Plan Strategy has not had full regard to other relevant plans, policies and strategies in an adjoining council district (C4 and CE1).

### **Monaghan and Cavan Council**

On a cross-border basis both Monaghan Council and Cavan Council adjoin Fermanagh and Omagh District Council. Monaghan is similar to Fermanagh & Omagh in that County Monaghan's population is dispersed throughout the rural areas with less than 30% of the population living in the urban areas. Monaghan County Council Plan includes DRCs (Tier 6). Cavan County Council also refers to 'smaller rural communities' which are recognised as having what could be described as proto-urban characteristics and may provide valued local services to the surrounding agricultural community. The Cavan Plan further states that development of an appropriate scale and design shall be considered where there is an identifiable physical association with such communities. Individual or small groups of dwellings and appropriate retail or service facilities may be suitably located within such communities. Killyfole DDA are of the opinion that the FODC Plan Strategy has not had full regard to other relevant plans, policies and strategies in an adjoining council district (C4 and CE1).

Continued

**Community Plan**

As the FODC Community Plan states Fermanagh and Omagh is primarily rural and a key challenge will be '*to ensure the continues vitality and sustainability of our rural communities*' (p. 5). Fermanagh Rural Community Network consider that one way to achieve this would be by maintaining the current DRCs and even designating others as Mid Ulster is proposing. The Community Plan also emphasises that it is projected that 23% of the population will be 65 years or above by 2030 and '*we must be ready to embrace it*'. Section 77 (2) of the Local Government Act requires a council to take account of its current community plan. The Draft Plan must be reasonably flexible to deal with changing circumstances (CE4). Fermanagh Rural Community Network would emphasise that the district has a low population density and high levels of isolation with DRCs provide community facilities i.e. halls, churches etc and allow people, who would otherwise be prevented from, to live close to aging relatives thus providing care for a large proportion of the population. The geography of Fermanagh, with the lakes partially dividing the county, means that DRCs are more important than in other areas to prevent isolation. People living in DRCs associate with them as part of their identity and it is important to keep these communities alive. Killyfole DDA would argue that the FODC Plan Strategy has not taken account of the Community Plan (C2) and is not reasonably flexible (CE4).



## Modifications

What, if any, modifications do you think should be made to the section, policy or proposal? What specific modifications do you think should be made in order to address your representation?

Killyfole DDA has carefully considered the issues raised by our groups members and puts forward the following recommendations for consideration

1. Killyfole DDA would like the Draft Plan Strategy Policy on 'Rural Community Areas' adapted so the eleven existing DRCs are identified and designated at the appropriate time in the development plan process. Also, due consideration needs to be given to the possibility of designating others. Killyfole DDA would like the LDP tailored to the local area; acknowledging the geography and social infrastructure of the district and taking account of community representation. It is evident there is a strong community association and identity with these designations. The Plan Strategy needs to take account of existing policies and responses to the Preferred Options Paper.
2. Killyfole DDA would highlight the aging population in the district as identified in the Community Plan. FRCN recommends one way of practically addressing this, in terms of care and social interaction, is through ensuring the DRCs remain designated e.g. housing such as rural association homes close to aging relatives and community facilities such as churches and community centres. The Plan Strategy needs to take account of the Community Plan and provide flexibility for a changing population.
3. Killyfole DDA would like to see more acknowledgement of DRCs in adjoining Council areas and the importance of DRCs to rural communities. The DRCs in Fermanagh need to remain viable and be able to contribute to local services e.g. sufficient population to support local schools and contribute to tourism supporting tourist numbers across the district as well as providing employment/social opportunities. Killyfole DDA recommends that the Plan Strategy needs to have realistic and appropriate policies/allocations for the Fermanagh area and provide a coherent strategy when considering adjoining areas.

*(Continue on a separate sheet if necessary)*

If you are seeking a change to the Draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

- Written Representations**       **Oral Hearing**



### SECTION 3. Data Protection and Consent

#### Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at [www.fermanaghomagh.com/your-council/privacy-statement/](http://www.fermanaghomagh.com/your-council/privacy-statement/)

**By proceeding and submitting this representation you confirm that you have read and understand the privacy notice above and give your consent for Fermanagh and Omagh Council to hold your personal data for the purposes outlined.**

#### Consent to Public Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Please note: Even if you opt for your details to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner/Authority they appoint to oversee the examination in public into the soundness of the plan. This will be done in accordance with the privacy statement above.

- Yes with my name and/or organisation  
 Yes, but without my identifying information

#### Signature

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#### Date

20/12/2018
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