



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

CARROLL

Last Name

O'DOWAN

Job Title (Where relevant)

HEALTH SPOKESPERSON FOR FFAN

Organisation (Where relevant)

FFAN (FERMANAGH FRACKING AWARENESS NETWORK)

Address

[Redacted Address]

Postcode

[Redacted Postcode]

Telephone Number

[Redacted Telephone Number]

Email Address

[Redacted 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

CARROLL

Last Name

O'DOLAN

Job Title (Where relevant)

HEALTH SPONSOR PERSON

Organisation (Where relevant)

FFAN

Address

[Redacted Address]

Postcode

[Redacted Postcode]

Telephone Number

[Redacted Telephone Number]

Email Address

[Redacted 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** DRAFT POLICY MIN 04  
PART 4.8'S POLICY CLARIFICATION
- (ii) **Relevant Policy** ECONOMY SECTION 4 PAGE 127
- (iii) **Proposals Map**
- (iv) **Other**

**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.

UN SOUND UNDER P2

FFAN [Fermanagh Fracking Awareness Network] would like to comment on the FODC Draft Strategy Plan. FFAN is making this submission under section P2 of the 'Soundness' Test'. The definition of fracking needs to be more strictly defined to take into account the 625 responses sent in by the public in 2016, to the FODC preferred options paper.

FFAN submit that the sentence on page 127 [policy clarification 4.89] of the draft FODC Local Development Plan Strategy that ends 'also known as hydraulic fracturing or fracking' should be replaced with: 'also known as hydraulic fracturing or fracking; which means the generation of mechanical fractures in rock below the surface by means of the physical process of pumping fluid at high pressure into the rock via a petroleum wellbore for the purpose of enhancing the flow of all hydrocarbons between the rock and the wellbore.'

The reason why this more detailed definition of fracking is required is so as to fully cover all frackings various forms and names by defining fracking by its actual physical process. (necessary)

**Modification**

What, if proposed address

Draft Policy MIN04 [also page 127] states that the FODC 'will not permit exploitation of unconventional hydrocarbon extraction until it is proved that there would be no adverse effects on the environment or public health'. Proof that fracking is safe can not now ever become available as the huge and ever growing body of peer reviewed science compendium available at policy order to

www.concernedhealthny.org shows that fracking is dangerous under all circumstances, no matter what level of regulation exists.. Below is the last paragraph of the latest compendium [Fifth edition, 266 pages, March 2018]

" We close with an observation by Maryland physician Judy Stone, MD, whose recent essay in Forbes speaks for all who have contributed to this Compendium: 'Fracking profits go to private industry but the public—families and communities—bear the costs of the many health complications from the drilling. There is growing evidence of a variety of health problems being associated with fracking. Common sense dictates that drinking and breathing cancer-causing agents will take their toll. The correlation is too strong to ignore, especially when we have other, cleaner energy options. For our safety and that of future generations, we should not allow the new administration to sell off public lands, nor allow drilling on our land, and should ban fracking completely.' "

(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**

--	--	--

**Date**

20.12.2018
------------