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**Sent:** 21 December 2018 11:33  
**To:** Development Plan  
**Subject:** Fermanagh And Omagh Draft Plan Strategy Representation

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## Fermanagh And Omagh Draft Plan Strategy Representation

John Feely  
Councillor - Erne North - FODC

## Draft Plan Strategy - Possible Unsoundness

### SP02 and RCA01

I believe that these two Draft Policies may be unsound under P2 and C4

In regards to SP02 the Council may not have fully taken into account representations that were made to it in regards to Dispersed Rural Communities. There were many submissions to the POP that highlighted the continuing need for DRC's within FODC area which may not have been fully taken into account.

Also in regards to SP02 the Council may not have fully taken regard of either Mid Ulster Council's or Derry and Strabane Councils plans, policies and strategies in relation DRCs and Small Settlements.

As with SP02 I believe the Council have not fully taken into account the representations made to it about RCA01 especially in regard to Rural Community Areas replacing DRCs.

During the whole process of Local Development Plan councillors have articulated their wish to retain the designation of Dispersed Rural Community within the LDP. I do not believe the Council have taken what other neighbouring councils are doing in regards to their LDP's.

On the 13th September 2016 at the R&C Committee the POP was agreed by councillors and this is the first time that the Council had agreed not to include DRCs in our settlement hierarchy. Before agreeing to endorse and adopt the POP a councillor raised the fact that DRCs were not referenced anywhere within the POP. Councillors were told that since the publication of the Strategic Planning Policy Statement(SPPS) this terminology no longer existed. I believe this statement may have led to confusion for councillors as to whether the 'terminology' DRC no longer existed within planning as a whole and so could not be included in the POP or whether it was just not in the SPPS.

It must also be pointed out that on a number of occasions it was mentioned to councillors that the legacy Fermanagh District Council was the only council out of the legacy councils that had actually included DRCs in their area plans. Both Cookstown and Magherafelt had area plans that included DRCs. I believe that had councillors been informed of this at anytime their decisions later may have been different.

In conclusion SP02 should be amended to include DRCs as a designated settlement coming after small settlements to be more in line with Mid Ulster and Monaghan. Alternatively you could look into reclassifying some DRCs as small settlements more in line with Derry & Strabane and Leitrim. As a result of this there may have a knock on effect to RCA01, DE03, DE06, HOU17, TCR04 and other policies which may have to be looked at again.

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I also believe that the Rural Need Impact Assessment(RNIA) may not have fully acknowledged nor investigated the impact to the residents of the eleven Dispersed Rural Communities(DRCs) that were recognised in the settlement hierarchy of the Fermanagh Area Plan 2007 that will no longer be recognised within the FODC Local Development Plan.