



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 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

Alastair

Last Name

Keys

Job Title (Where relevant)

Architect

Organisation (Where relevant)

Keys and Monaghan Architects Ltd

Address

12 Main St

Irvinestown

Postcode BT94 1GJ

Telephone Number

028 686 28088

Email Address

[REDACTED]

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?**

- HOU** **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 | HOU 3 , paras 4.49 - 4.53 incl. & TOU 03 |
| (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.

Hou 03 – Affordable Housing : The aims of this policy are worthy but it must be taken into consideration that there is little or no profit margin in the development of the majority of sites in the district.

If you take a typical semi-detached 3 or 4 bedroom house selling for say £115 or possibly £120k and allow even a modest sum for site purchase, roads/ sewers etc to an adoptable standard, statutory and professional fees, selling and legal costs, construction costs etc – it's not difficult to see that there is little left for the developer, who has to take a considerable risk in any case (consider the fate of so many after the 2007 crash). If it's envisaged that the developer will have to sell 10% of their product at a loss it will further deflate the industry.

The notion of affordable housing would have been fine when there was a significant profit margin available – but that just isn't the case now and it's difficult to see that changing any time soon.

Paras 4.49 – 4.53 and TOU-03: There is virtually no mention of Lough Erne in the Tourism Strategy. The focus seems to be on the Marble Arch Caves, Cuilcagh and the Sperrins. These are obviously tremendous assets to the district but so too are the lakes and islands. They are what makes Fermanagh distinctive in terms of attracting tourists to the area and the Development Plan is an opportunity to really tailor tourism policy to that. This seems to have been missed, falling back, it seems to PPS 16 or something similar, which was written to cater for NI as a whole and doesn't serve the specific context of the Fermanagh lakes, which this Plan obviously ought to do.

Getting access to and activities on the lake, as well as being able to stay and dine etc close to the water are important. Clearly it is really important to protect the natural asset but there does need to be more thought put into how that can be done successfully whilst also allowing some development on or close to the shore. There must be good examples where this has been done elsewhere.

Existing hotels and tourism businesses are 'protected' and allowed to expand, but there is little or no room for new the new product that is so badly needed. There is some scope for redevelopment of vernacular buildings etc – but that will be very limited in scale.

(Continue on a separate sheet if necessary)

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?

Affordable Housing isn't affordable in this district. If it is to be included then the threshold of when it is applied should be raised significantly.

The Tourism Strategy needs a lot more thought. Presumably tourism specialists have been consulted as to what visitors want / expect? The strategy needs to take more consideration of that and the unique resources and opportunity we have to make the area a proper tourism destination and not one that just dabbles in it.

(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/

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: 21.12.18.

Date: <

Date: <