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To: National Planning Framework
Subject: Rural Housing

4.5 Open Countryside

National Policy Objective 18b

Rural Housing

An area of particular concern to Fianna Fáil is the uncertainty created over rural housing. Object 18b of the NPF raises a series of questions. The absence of social criteria for the basis for single housing permissions appears to be drawn from the 2013 ECJ Flemish case on rural housing. Given that the department has yet to issue clear guidance on this matter and the 2005 guidelines remain in place this appears to be putting the cart before the horse. The final NPF should provide clarity on the acceptable criteria to be followed in single rural housing applications.

The NPF must not put in place a regime that penalises local residents with a clear social link to a locality. That link is a crucial part of what infuses villages, towns and townlands in West Cork and across Ireland with their distinctive character and community strength. The use of the definition of "economic need" must be assessed not just in line with EU law but our broader national objectives.

It is important to recognise that communities such as those in West Cork are not defined by economic relations alone. Individuals with a clear social or familial link to an area make a rich contribution to the strength and vibrancy of a community. Retaining and enhancing that strength must be a clear goal for the NPF.

That distinctive social infrastructure of rural areas is a solid attraction for families. Unlike in many urban centres the ease of access to pre-existing social networks around sporting, religious or other activities is a key asset for areas such as West Cork. Helping to retain, protect and deepen those networks must be accommodated in any overarching planning framework. The current draft document does not encompass that concern.

Nor does it recognise the full breath of EU law which allows for planning restrictions based on appropriate measures. We believe the final National Planning Framework document should incorporate that legal scope and pressing social need to retain and strengthen the character of rural areas like West Cork

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