

10 November 2017

Draft National Planning Framework

To whom it may concern,

Following a review of the Draft National Planning Framework, I believe the following areas require further attention:

- **Assessment of and decisions on development proposals:** The planning system urgently requires reformation in order to situate community participation at the centre of decision-making around large developments. Obligations for developers to engage with communities should be embedded in policy and practice with community participation in decision-making occurring prior to the submission of applications for planning permission.
Failures to engage communities in decision-making undoubtedly contributed to the long-lasting Corrib gas conflictⁱ and is a factor driving resistance to renewable energy projectsⁱⁱ. Strategies to promote local acceptance have tended to focus on 'information provision'ⁱⁱⁱ, an inadequate approach as communities that contribute to and shape...energy are more likely to be supportive of future developments^{iv}. Given growing resistance to renewable energy^v, achieving **National Policy Objective 44** in terms of land based infrastructure for renewable energy requires shifts in decision-making around developments in order to ensure genuine community participation. **National Policy Objective 54** should also ensure the planning system is responsive to social needs and challenges. Similarly, **National Policy Objective 57** necessitates direct engagement with communities around potential locations for renewable energy generation in advance of any applications for planning permission being submitted. I recommend that **National Policy Objective 70** includes requirements for reports on societal impact as part of wider environmental considerations. Such reports on societal impact should include qualitative research with communities likely to be affected by developments to gauge their concerns; societal impact reports should also involve mechanisms for community participation in decision-making around location, type, construction and operation of developments.
- **National Policy Objective 14:** targeting growth in the country's Northern and Western region should ensure that development occurs in the Northern region, not simply Galway or the wider Western region. Donegal is one of the counties worst affected by the recession and continues to suffer from emigration, unemployment, underemployment, deprivation, long journeys to access health services (often

Galway, Sligo or Leitrim) and employment (given limited employment opportunities in the county and poor broadband in rural areas), and poor public transport. Given the county's longstanding interdependence with Derry city, Brexit poses further threats to the area and it is imperative that Donegal is targeted as an area requiring special attention within **National Policy Objectives** such as **14** and **47**.

- **National Policy objective 25 is to be welcomed:** promoting and creating sustainable community development is key to developing healthy, happy and active communities. Central to these activities is the community and voluntary sector which has been devastated by cuts and closures during the recession. Achieving this objective will require redirection of funding back to the community sector in tandem with creation of new opportunities for employment, education and training for existing community workers and emerging community leaders. By revitalising the community sector, sustainable community development will be advanced by people with the necessary knowledge, skills and capacities to empower communities to become more sustainable.

Yours sincerely

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ⁱDetailed in Slevin, A. (2016). *Gas, oil and the Irish state: Understanding the dynamics and conflicts of hydrocarbon management*. Manchester: Manchester University Press.

ⁱⁱ Songsore, E. and Buzzelli, M. (2016). 'The value of mixed method content analysis for understanding renewable energy deployment and policy outcomes.' *Journal of Environmental Policy and Planning*, DOI:10.1080/1523908x.2016.1246245

ⁱⁱⁱ International Energy Agency (2010). Social acceptance of wind energy projects: 'Winning hearts and minds'. State-of-the-art report – country report of Ireland. Available from http://www.socialacceptance.ch/images/state-of-the-art_acceptance_wind_energy_ireland.pdf

^{iv}National Economic and Social Council (2014). *Wind energy in Ireland: Building community engagement and social support*. Report no. 139, July 2014. Available at http://files.nesc.ie/nesc_reports/en/139_Wind_Energy_Main_Report.pdf

^v Brennan, N. and Van Rensburg, T.M. (2016). 'Wind farm externalities and public preferences for community consultation in Ireland: A discrete choice experiments approach.' *Energy Policy*, 94, pp. 355-365)

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