

IFA submission to the Department of Housing, Planning, Community and Local Government on the national planning framework consultation *Ireland 2040 Our Plan* 

The Irish Farm Centre Bluebell Dublin 12

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## Introduction

Agriculture and the food industry is the leading indigenous sector of the Irish economy. More than any other sector, the benefits of agricultural growth, both economic and social are widely dispersed throughout the country.

For example, farmers and their families spend almost €8bn per year in the Irish economy, both on farm inputs and services and on household expenditure. Most of this money is spent locally, supporting jobs and enterprises in every town and parish across Ireland.

These facts demonstrate a vibrant rural economy, underpinned by an innovative and progressive agrifood sector.

This public consultation *Ireland 2040 Our Plan*, provides a real opportunity to align the planning process with the sustainable development of the agri-food sector, which is on a trajectory to grow exports to almost €20bn over the coming years, as set out in *Food Wise 2025*.

## Key actions required

#### **Rural housing**

Extended family networks are commonly the fulcrum of townsland and parish activity in rural Ireland. Whilst not being employed directly on family farms, extended family members often provide seasonal assistance at busy times of the year. Other community life, such as organisation of sporting activities, community development work and social gatherings are often co-ordinated by these same people.

This extended family network concept is a good thing for rural Ireland and driven by a sense of community, place and desire to be part of and participate in vibrant rural communities. It is also reflected in Ireland's settlement pattern, which has created a living countryside.

The consultation document does not recognise or adequately address the importance of supporting the *extended family network* concept. It broadly sidesteps the legitimate expectation that a planning framework out to 2040 would have a clear statement, with stipulating actions which supports families with an intrinsic link to rural areas.

IFA proposes that the Sustainable Rural Housing – Guidelines for Planning Authorities must be revised and put on a statutory footing. The Guidelines should provide that local authorities would grant planning permission for families who wish to live and work in their local community, and for sons and daughters of farmers who have an intrinsic link with the rural area.

#### Addressing the doughnut effect in rural towns and villages

Planning policy has over the past number of decades supported the development of out-of-town shopping centres, commonly on the periphery of towns and villages, instead of in-filling existing brown field sites.

This planning policy has created *a doughnut effect* in many rural towns, devastating commercial life in the town centres, with foot-fall and commercial activity gravitating towards the out-of-town locations.

IFA proposes that the Department of Housing, Planning, Community & Local Government should lead an inter-departmental group to deliver the following actions in rural villages and town centres:

- New business start-ups should receive incentives such as exemptions from rates for an initial time period and relief from capital gains tax, to encourage innovation and enterprise.
- Double tax relief should be provided on rental expenditure for businesses establishing in rural towns and villages.
- A condition for a valid planning application for an out-of-town development must include an obligation to demonstrate how all scenarios, including locating in the village or town centre, were first considered.

## Rebalancing development in Ireland

The failure to deliver balanced regional development is acknowledged in the consultation document. A realignment of planning policy must be supported by the delivery of services, including broadband and other such communications infrastructure.

Planning policy for the regions cannot be developed in isolation. Therefore IFA calls for the swift conclusion by Government of the tendering process for the new rural broadband scheme, which must ensure that every home, school and business in rural Ireland has access at a universal price to high-speed fibre broadband, no matter where they are located.

In anticipation of this, planning policy must evolve to remove the necessity to commute long distances to work, or purchase more expensive dwellings in urban locations by embracing the concept of e-working in the local community. The local needs criteria for planning applications would therefore no longer be universally applicable.

The delivery of this proposal would play a part in delivering a reduction in greenhouse gas emissions from the transport sector, which is singularly the sector where emissions have spiraled out of control. It will also take pressure off the 43 densely populated regions, which have direct discharges of wastewater and sewage into our waterways.

#### Renewable energy that works for rural Ireland

Renewable energy development in Ireland has to date broadly been developer led and haphazard, with many local authorities including chapters on renewable energy in their County Development Plans in reaction to community concerns or developers' activities, rather than in a planned policy led way.

The failure of Government to develop a consensus approach to energy development continues, with the failure to establish a National Energy Forum as committed to in the energy white paper "Ireland's Transition to a Low Carbon Energy Future 2015-2030'.

Renewable energy has an important role to play, as an alternative farm income source, to mitigate greenhouse gasses and to reduce dependency on imported fossil fuels.

# IFA proposes the following:

• Government must introduce statutory legislation, which places legal set-back distances that renewable projects can be from sensitive properties, including family homes, schools and villages.

- The potential of the extensive electricity network must be maximized by ensuring that the planning environment facilitates locally produced power to access the electricity grid.
- A national planning policy must be developed for community energy projects, which facilitates renewable projects that have community participation.
- Similar to other EU Member States, farm scale renewable projects should be exempt from planning requirements.

## Pre-planning consultation for infrastructure projects

Non-statutory consultation with communities by electricity, renewable energy and other large scale infrastructure projects has generally varied from non-existent to inadequate. This has led to resistance and opposition from communities.

IFA proposes that planning applications must only be considered valid by a planning authority, where the project promotor can demonstrate that they have communicated directly with all property owners within a 10km radius of the proposed project.