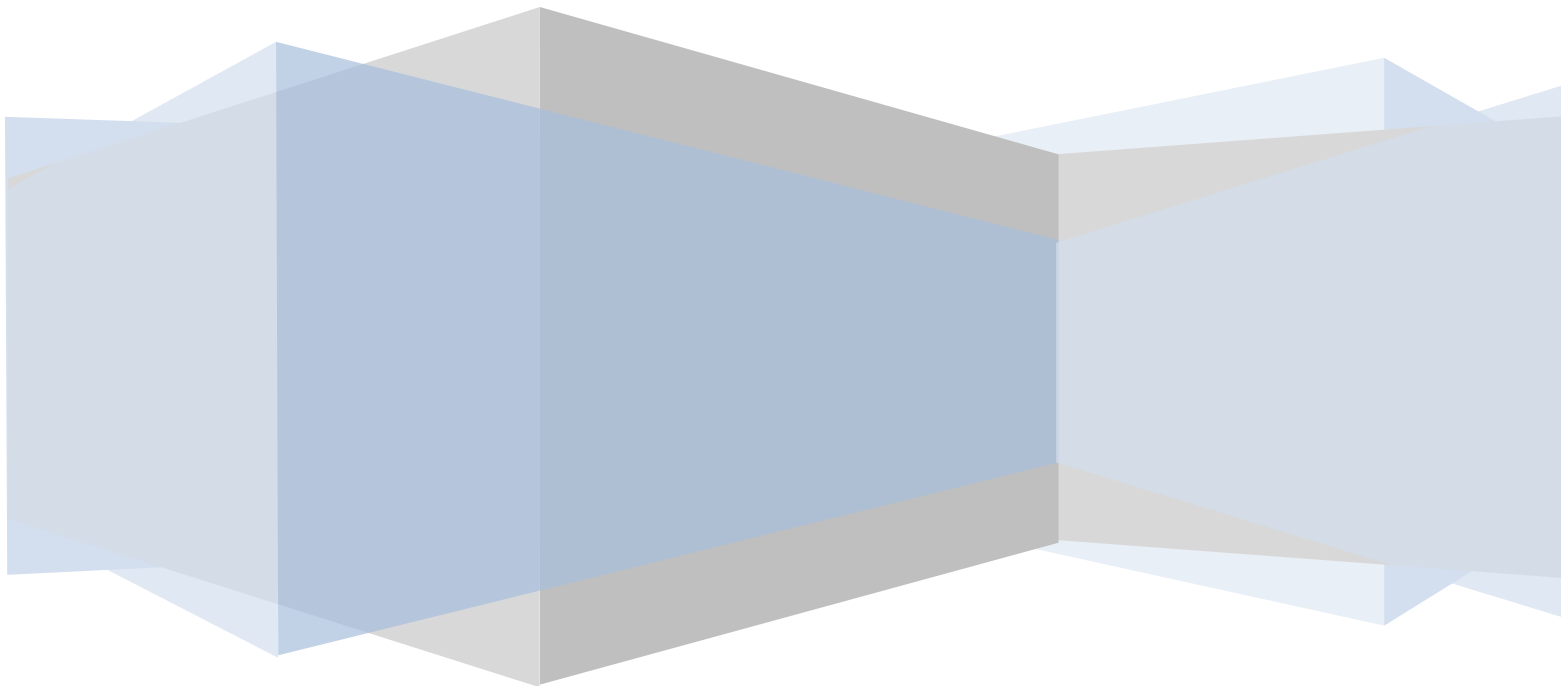




ICMSA Submission to the Public Consultation on The draft National Planning Framework Ireland 2040



The draft National Planning Framework Ireland 2040 paper clearly highlights the desire of the Government to consolidate population growth to urban centres and aims to regenerate urban areas and develop on brown field sites to achieve this. However, there is little discussed in the plan as to the provision of services for the other estimated 50% of the population that will continue to live in rural areas. In particular, ICMSA would like to make the following points.

- ICMSA supports the inclusion of Objective 70 and 71 supporting innovation and sustainable agriculture in rural Ireland but we are frustrated with the lack of concrete solutions as to how rural businesses including farm will be supported. Despite a reduced population in rural areas compared to urban centres, the demand for services can be similar. A decline in population should not mean that rural dwellers should endure sub optimal services. In the context of a National Planning Framework, explicit provision should be made for the provision of a range of services and infrastructural development which would be the minimum base and indeed the entitlement of people living in and working in rural areas. Rural businesses including farms require access to adequate services such as human capital, three phase electricity, water and broadband if we are to achieve Food Wise 2025 growth targets. The ICMSA would have serious concerns that such services will not be available to farms in rural areas and ICMSA proposes that the paper includes a plan as to how the service demands of rural businesses be met.
- In the same section, the following is stated:

“To avoid competition between various land use options, tailored land management policies may be required to minimise unwarranted competition between land use categories and may prove to be cost effective in dealing with climate change.”

This is a major policy initiative. Thus, it is surprising that there is no elaboration of how this can be put into practice, the criteria to be used and who would design and implement these “tailored land management policies”. Such policies are likely to have a direct impact on the lives of ICMSA members. Elaboration of this point is needed before ICMSA can support this suggestion.

- ICMSA is seeking clarification as to how the proposed new System Housing Needs Demand Assessment will impact on the provision of required new housing stock in rural areas to farmers and family members. In the document, it is highlighted that planning permission for housing in rural areas will only be granted to people who have an economic need to live in the countryside. This is particularly applicable to those that live within specified distances of city regions. There will always be a need for new housing in rural and open countryside in Ireland for farmers and family members who may not be directly involved in farming. Their need to live in the country extends beyond an economic need. It is important that the government appreciate and respect the importance of family life in rural Ireland and the desire for farming families to live in the countryside especially if we are to reverse rural decline. A black and white distinction for those wishing to live in the countryside within proximity of city regions does not suffice or respect the desires for those that grew up in and wish to reside in the countryside. This issue needs to be addressed and people who grew up in rural areas should have the right to build a family home in that area.
- It is ICMSA view that the planning procedures in place presently are not fit for purpose and unnecessarily complicated. The current regime is itself an obstacle to proper and timely development. The imposition of

yet another layer of administration and regulation namely the proposed Planning Regulator will only add to greater complexity. If an argument can be sustained for the creation of a regulator, what current functions if any of the Department of Planning, An Bord Planala, the Regional Assemblies are local authorities will be taken over. This is not clear in the draft document. Planning laws and procedures need to be simplified to ensure a more appropriate institutional framework for planning in all its dimensions. ICMSA is proposing that the final paper contains a detailed plan as to how this can be achieved including clear roles for the relevant regulatory bodies and authorities.

The development of rural areas is of major concern to ICMSA and its members and ICMSA is concerned that certain aspects of the Draft National Planning Framework will negatively impact on rural areas and these matters must be addressed before the framework is finalised.