



31 March, 2017

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

A Cháirde:

I wish to make a submission in relation to the National Planning Framework. I do so in relation to my experience of the existing planning system and the emerging solar industry in Ireland, for which there appears to have been little or no Government foresight or strategic planning. I therefore welcome what appears to be a more forward-looking approach to planning, as referenced in *Issues and Choices*.

I read with interest the many references to climate change, Ireland's climate action objectives, and renewable energy targets. While I am supportive of the Paris climate agreement and our country's responsibility to meet its targets, I wish to raise the following in relation to the National Planning Framework:

- Energy-specific or development-specific Government policy, legislation and planning guidelines should be in place before planning is granted to a new industry area in order to ensure best practice and a strategic, plan-led approach to this new industry in Ireland. This should include the ability for the Government to legally stall planning decisions to prevent opportunistic developers from flooding the planning system to blatantly take advantage of a legislative vacuum, as is the current situation with solar farm applications.
- A measurable scale of loss versus gain should be explored in determining the suitability of rural locations for renewable energy development, specifically in relation to the 'natural' environment and rural community.
- The capacity of urban areas for renewable energy generation should not be overlooked. In fact, commercial, industrial and residential developments should be fully exploited in relation to their energy generation capacity, as well as their energy savings capacity. If we are fully committed to lowering carbon emissions and increasing renewable energy, we should be striving for the equivalent of LEED building standards in the commercial and industrial sectors and passive housing in

residential, and have a clear timeframe for changing building guidelines and implementing incentives for the achievement of these standards.

- We should learn from the experience and best practice of other countries in identifying alternative sites to scenic rural settings and prime agricultural land in the siting of renewable energy developments, such as brownfield sites including previously developed land, covered landfill that cannot be farmed or developed for housing. Classification of land, as is done in the UK, would certainly serve to protect quality agricultural land.
- Energy infrastructure, areas of high demand for energy and grid capacity should be integral, if not the leading factor in the siting of renewable energy developments in order to optimize energy consumption during energy generation and reduce the need to “transport” or store energy. This approach would also support a more strategic investment in the necessary infrastructure rather than forcing inefficient expenditure on infrastructure to accommodate ad hoc renewable energy sites chosen by developers.
- Finally, the integrity of the planning system needs to be upheld. To ignore the need for changes to the planning legislation arising from an unexpected surge of a new industry, and to continue to allow the grant of planning to hundreds of developments in communities around the country on the basis that some or most of them will not be realized, not only demonstrates a lack of respect for the very fundamentals of the planning system, but complete disregard for the emotional and financial stress of the people impacted by the planning process.

Thank you for your consideration.

Yours sincerely,

Aoife Carlin  
On Behalf of Jagoes Mills Action Group

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