

Ref:110422

11 April 2022.



Forward Strategic Planning,
Economic Development Directorate,
Limerick City and County Council,
Merchant's Quay,
Limerick,
V94 EH90.

Re: Material Alterations to the Limerick County Development Plan.

Dear Sir/Madam,

The Irish Creamery Milk Suppliers Association (ICMSA) is a national farm organisation that represents all farmers particularly dairy and livestock farmers. ICMSA places particular emphasis on preserving the family farm structure and defending the rights and incomes of farm families. ICMSA is the only farm organisation to have its headquarters in Co. Limerick. The Limerick County Executive of ICMSA would like to take the opportunity to re-emphasise and stress again the importance of the points we made in our previous submission on the Draft Limerick Development Plan 2022-2028.

Housing

Limerick ICMSA strongly believes that there should be no restrictions to rural one-off housing. It is essential that planning permission for one off housing in the countryside is not restricted particularly for family members and those local to a region.

Services to rural areas must be improved including rural roads, water services and waterway maintenance. A priority for rural living is the availability of broadband, the poor availability of which in certain areas was highlighted during lockdown. In order to sustain rural communities, people must be afforded the opportunity to work from home. It is crucial that internet services are enhanced throughout the county immediately to enable this.

Vacant units in cities and towns should be prioritised for development to increase housing availability in urban areas and to bring economic activity back to the centres of towns.

Climate Change

Farmers should be encouraged to install solar panels on their sheds and the relevant infrastructure so that surplus energy can be put back onto the grid. This has the potential to become an additional funding stream for farmers and reduce the counties dependence on energy from fossil fuels. In this regard, the planning laws should exempt solar panels on farm sheds from requiring planning permission.

Flooding and River Maintenance

A river maintenance programme should be included in the Limerick Development Plan. Such a programme can positively impact flood management, water quality and prevent water damage to homes living in close proximity to rivers. During maintenance works, landowners should be notified prior to any river maintenance works beginning near their land. A dedicated budget should be available annually for this programme.

Sustainability Goals

As farming is a large employer in rural Limerick, commercial and sustainable farming should be supported by addressing the social and economic aspects of sustainability in addition to the environmental aspects in the development plan.

Economy and Employment

Specific initiatives are required to strengthen the rural economy and communities. There is a significant number of people commuting from rural Limerick for work. Their employers should be encouraged where possible to allow their staff to work from home or at community hubs in their own locality. This would contribute positively to the climate challenge and also combat rural decline.

Limerick has the third highest numbers of dairy cows in the country. Dairy farming directly and indirectly is a significant employer in the county. It is essential that farmers are exempt from the standard development charges on any investments on farm that contribute positively to the environment.

Retail Strategy

There needs to be a focus on making the environment in town centres more attractive to encourage business to set up in the town centres and for people to live and visit these town centres. Specific units should be eligible to pay lower rates if they are beneficial to raise the profile of the town centre.

Infrastructure

Given the recent water shortage in parts of rural Limerick and the lack of capacity of current water and wastewater infrastructure, investment in this area must be prioritised.

To encourage people to live in rural Limerick and combat rural decline, infrastructure such as road networks needs to be greatly improved and maintained.

Transport and Mobility

Public transport in rural areas needs to improve to encourage people who work in nearby towns/cities and who do not drive or would like the option of public transport to take up residency in rural villages and areas.

Heritage

Grants should be provided to farmers to restore traditional farm buildings. While a grant is available under GLAS, the budget is limited and thus, few farmers have received this grant. Therefore, many old farm buildings need to be restored and the Council should play a role in this regard.

Your attention to the above-mentioned concerns would be greatly appreciated going forward in the development in the Limerick Development Plans 2022-2028. ICMSA would welcome the opportunity to meet with Council officials to discuss the Draft Limerick Development Plan and ICMSA's Submission on same.

Your sincerely,

John Bateman,
Chairperson,
Limerick ICMSA.