
Ireland 2040 – Our Plan Draft National Planning Framework

Public Consultation-Forest Friends Ireland's submission 8/11/17- **Forest Friends**

comment/General: As in the case of much of Ireland 2040 the plan appears to be strong on aspirations, strategic economic objectives, but short on specifics which would guarantee the fulfilment of the stated objectives. The breakdown of the rural fabric as evidenced by post offices and Garda stations deficiencies in public transport, deficiencies in enterprise initiatives, the decline of the urban fabric of towns and villages. Serious declines are evidenced in towns like Kiltimagh in Co. Mayo, Kilticlogher in Co. Leitrim, and Graignamanagh in Co. Kilkenny to name just a few. The following objective is well stated but the roadmap to its fulfilment should be spelled out:” **Objective-Strengthening Ireland’s Rural Fabric-Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacancy and deliver sustainable reuse and regeneration outcomes**”. Although there is a clear objective to preserve and enhance **the rural fabric** there appears to be a lack of specifics as to how this can be achieved and how the accelerating move to the main urban areas can be arrested so that people can live and work and find social activities in sustainable communities.

Forest Friends critique of Ireland 2040:

- A. The decision making process in Ireland is becoming more and more centralised. Ireland 2040 further promotes and would accelerate it for example as evidenced in the following aspiration of the plan: **“State-Led Strategic Land Development To support and aid the implementation of Ireland 2040 at Government, departmental, local authority and state agency levels, an examination of the potential to more effectively and centrally manage the overall portfolio of state owned and/or influenced lands in the five main cities and potentially other major urban areas will be undertaken as a priority. More effective and central management would offer major benefits in enabling effective portfolio based management of the overall publicly owned lands in and around our main cities and other urban areas both working with local authorities, local communities and the private sector including....”**:The centralization of power structures and decision making to the detriment of the ‘principle of subsidiary function’ can be seen in the creation of centralised bodies, ‘authorities’ such as Irish Water, the HSE, the National Roads Authority, Tusla and various other bodies. On the other hand due to actions taken during the recession many of the powers and traditional roles of Local Authorities and other local service agencies have been diminished to such an extent that in the case of local authorities cannot now fulfil some of the important functions previously carried out by them such as providing local authority built houses. Staffing rates and technical expertise have been seriously reduced. Much of the work and functions have been privatised. The capacities of local authorities need to be restored. Decision-making in the case of waste management for example has resulted in an incinerator being built in Dublin city against the wishes of the majority of elected representatives. The fast tracking of decisions bypasses the local authorities in the planning process. The introduction of self-certification in building has resulted in the necessity to abandon a large apartment complex in north Dublin and there may be many more at risk. Local authorities traditionally monitored construction with a very effective inspectorial

model. Historically Dublin City Council had a property section which had a valuation section and a property acquisition section which were proactive in identifying lands for local authority build. Some of these aspects need to be revisited and reassessed in the national plan, i.e. what happened to these functions? What staffing requirements are now required? What is required so that local authorities can play once more an important role in the move towards a better affordable housing module for a sustainable future? The emasculation of the local authorities in Ireland is further evidenced by the fact that multi occupancy tenancies are not properly policed to ensure proper standards for tenants. There are serious deficiencies in the system with regard to legislation, inspectorial system, financial resources available to the enforcers (the Local Authorities), and a certification system which should operate much as the NCT procedures for vehicles.

- B. **The Principle of Subsidiary Function:** Subsidiary is an organizing **principle** whereby functions should be carried out which can be fulfilled by the smallest, lowest or least centralized competent authority. Political decisions should be taken at a local level if possible, rather than by a central authority. This is a long established principle which provides for greater local democracy and empowerment. This would have applied in the case of local versus central government and in the case of the EU that it would not take over functions which could well be carried out by its members
- C. **Historical context: Ireland 2040 quote:** "Green Belts and Open Spaces Plan for green space to prevent coalescence of settlements and to enhance quality of life". In the case of Dublin it would be helpful to give a short presentation on the previous plans for that city and as to why they were not implemented. **By way of introduction reference could be made to the Myles Wright plan which was made in 1967 this plan was commissioned by the Irish government. Prof Myles Wright of Liverpool University was an esteemed town planner, His main recommendation was the creation of four new towns to the west of the existing city and a box-like road system around the city. The plan was never implemented. Prior to that was the Patrick Abercrombie's vision of Dublin (1922) plan. Sir Patrick Abercrombie, the British architect and town planner redesigned London after the Blitz. He was the winner of the 1916 Civics Institute of Ireland competition on town planning for Dublin He made development proposals for Dublin in 1922 which were reproduced at a later stage. There was also the Travers Morgan traffic plan for Dublin city produced in the year 1973.**
- D. **The Ireland 2040 Plan** generally is strong on strategic, economic and structural physical aspects and aspirations but lacking on enabling specifics.
- E. Present structural deficiencies and historical failures have resulted in a democratic deficit, whereby there is a clear lack of **empowerment and constructive involvement** of local communities, minority and marginalised groups and NGOS in decision making processes. All these should be valued as stakeholders in the true sense of the term. New structures are needed to facilitate the changes needed.
- F. **'The Growth Illusion': Economist Richard Douthwaite a prominent member of the Feasta ENGO (Richard is now deceased) in his important, erudite and authoritative book 'The Growth Illusion has pointed out that uncontrolled and exponential growth is not desirable and is in fact damaging to the common good (ISBN: 9781870098762).** Much of Ireland 2040 is based on the concept of growth as the primary objective, mainly economic and physical.

- G. In the plan **Ireland 2040** the natural environment appears to take second place to the economic and the social. Yet the quality of life depends on environmental quality. EU directives in this regard are well factored into the plan.
- H. In general the aspirations and objectives of the plan need to be stated in **more specific objectives and quantified in economic terms so that there is a clear map to their implementation** .
- I. **"National Policy Objective 25"** "Facilitate the promotion and creation of sustainable community development and support community organisations in their work to provide for a more sustainable future". The question needs to be asked as to how this will be achieved in monetary and decision-making processes. From a public participation point of view it is important to have full implementation of the **Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental issues in the EU**. Financial assistance to local communities, minority groups, the marginalised and NGOs generally, should be part of this to enable them to fulfil a role which provides for parity of participation and esteem.

Some Specific suggestions:

1. **Air Quality:** The air quality needs to be addressed. Ireland has one of the highest rates of asthma in the EU. Particulates from diesel fuel are a major problem. Respiratory problems in general put great pressure on the health system and many unnecessary deaths resulting.
2. **The Marine:** It has been demonstrated that Ireland got a very bad deal with regard to its fisheries when we joined the EEC. Efforts should be made to address the imbalances in that regard. The loss of revenue resulting from the fisheries deal should be referred to in the plan. Other marine issues are the pollution of the sea by micro beads and plastics generally. The proposals to deal with micro beads leaves a lot to be desired and does not go far enough in contrast to plans by other jurisdictions, for example the UK. The trawling of the sea beds and damage to spawning grounds need to be addressed with specific objectives.
3. **Plastic pollution:** Plastic pollution is such that the fibres are now in the air that we breathe and in household dust. The air contains fibres from polyester clothing, traffic debris, road dust and fragments from water bottles and litter. Humans eat fish which contain micro plastics. Research has shown that children could now ingest more than 3,000 plastic particles a year. An Iranian study found that adults could swallow more than 1,000 micro plastic particles a year from dust, so that dust is a potentially important source of micro plastic contamination in the urban environment. When breathed in plastics could deliver chemicals to lower parts of our lungs, even across into our circulation similar to vehicle emissions. It has been estimated that between three and ten tonnes of synthetic fibres are dumped on to a city the size of Paris each year
4. **Endocrine disruptors (EDCs)** - *Glyphosate*-based herbicides are toxic and *endocrine disruptors* in human cell lines, chemicals that disrupt hormone systems. The sheer number of everyday products containing chemicals that disrupt hormone systems of both humans and animals is extremely serious. These harmful chemicals can be found in plastics, food

containers, cosmetics, electronics, toys, sports shoes and the rubber granules used on synthetic sports fields. EDCs are ever more present in nature, as several approved pesticides with hormone disrupting properties continue to be abundantly sprayed on vegetables and fruits. Hundreds of scientific studies have demonstrated that exposure to EDCs is harmful to health, even in small doses and should be banned. The present EU license for glyphosate expires on December 15 2017. The EU Commission proposes to have it renewed for a further period of ten years which requires approval by at least 16 member states representing 65% of the EU population. France has decided to vote against while Germany is undecided. Recent election has returned a coalition. The cancer-research arm of the World Health Organization last week announced that glyphosate, the world's most widely used herbicide, is probably carcinogenic to humans. But the assessment, by the International Agency for Research on Cancer (IARC) in Lyon, France, has been followed by an immediate backlash from industry groups. The European Food Safety Authority (EFSA) the European Chemicals Agency and regulatory authorities of some OECD countries maintain that glyphosate can be used safely.

5. **The Fate of our Bees:** Bees are main pollinators on whom much of our food depends. A range of systemic insecticides including neonicotinoid and fungicides are putting the bee populations the pollinators at risk in many parts of the world. Many seeds are now coated with these before planting, for example in the case of crops such as oilseed rape and winter cereal crops.

6. **Chem. Trails:** Chemical pollution in the atmosphere due to 'chem – trails' from aircraft: This is an issue that a national plan should refer to and with other agencies who have a role in decision-making work towards the establishing of proposals to begin to deal with this growing and uncontrolled pollution of the atmosphere. Peoples' health is at stake. An EU approach is called for and Ireland should be prepared to play a lead role. At present there appears to be a relative free for all in the polluting of the atmosphere and in geo-engineering generally.

7. **Transport systems:** The plan is based on an over reliance on private transport systems, building more motorways and roads as a primary end in itself. More investment proportionately is needed in **public transport, which should be viewed as a social service rather than a profit making enterprise.** It is clear to anyone trying to access remote villages and towns in Ireland by public transport that the present system simply does not work. Consideration should be given to the initiation of micro transport systems based on local need and accessibility principles. Such a matrix could supplement the existing public transport system whereby there is good connectivity to major cities and towns. This could be done without interfering with the structures that exist at present. A new network needs to evolve which could empower local communities and create new enterprises. An example of this new approach was some forty years ago I had occasion to visit and stay overnight in a small village in Monaghan. A private bus company ran a service (and hopefully still runs the service) to Monaghan (and perhaps Donegal was included in the itinerary). Passengers were disembarking at fixed locations and there were minibuses and taxis there to deliver them to their actual house or hotel. Surely this kind of a model can be seriously looked at and

redesigned to fit the needs of communities. Years ago also there was a micro system in Dublin City called 'Imp' which appeared to operate for short journeys within the canals. Surely such an approach is imperative in the present day context. There are strong arguments for a free public transport system based on the 'Imp' micro system within the canals in Dublin City and similar ones in other cities, with proper free parking to facilitate the process of keeping cars outside the canal cordon.

8. **The move to electric vehicles:** It appears that little progress has been made in this regard. Car manufacturers are playing their role in designing these vehicles. If the statistic that only five of the 6,536 vehicles owned by the state are electric-powered then this needs to change radically. Surely, the state, and semi-state bodies should be leading the way. The move away from diesel vehicles should be seriously expedited for urgent health reason.
9. **The 'modal split'** between public transport and private transport needs to change radically in favour of public transport. This is arguable on economic grounds because motorways and other road systems are hugely expensive to build and maintain. There is an absence of ready to go rail based transport projects in the plan. There is a total imbalance between the spend on private and public transport. The spend on cycling is minuscule. A seismic shift is needed to achieve a more acceptable model skewed in favour of public transport systems cycling and walking. Cities in EU countries such as Holland and Denmark have shown the way in this regard where cycling has become the norm to a great and desirable extent. The targets and steps thereto and investments needed should all be spelled out in the plan.
10. **Freight transport** needs to be recreated, supported and subsidised in order to reduce emissions. Although it would need structural changes it would be sustainable.
11. **In the case of energy-** a comprehensive national plan on retrofitting existing buildings needs to be devised, rolled out, promoted and implemented on a vast scale, representing vast savings. Such an initiative could create a vast number of jobs.
12. **Solar hydro and wind micro/energy.** In the case of solar, hydro and wind energy much more promotion and granting needs to be rolled out and be an essential part of the plan. In this way communities can be empowered and play a key role. Flat roofs not just of buildings but on other can be seen as possibilities for solar where the technology is user friendly and inexpensive. Traditionally in Ireland there were hydro wheels on rivers and farms had windmills. This level of micro technology needs to be revisited and subsidised down to the individual household where possible and practicable.
13. **Broadband, tele-working and teleconferencing:** The potential and savings resulting from the rolling out and serious promotion of broadband, tele-working schemes and teleconferencing need to be factored into **Ireland 2040**
14. **Moving to a low carbon climate resilient economy: Reducing carbon emissions:** This plan does not move Ireland sufficiently towards the goal of a low carbon climate resilient economy. Many more initiatives other than those listed need to be included and spelt out. Further schemes to reduce carbon emissions are called for, including for example, initiatives designed to reduce the intensity/frequency of journey to work, example encouraging businesses to introduce tele-working, e.g. working towards an office four day week, with one day working from home or from a local community based IT hub; car pooling; car sharing; on- line shopping whereby for example in the case of delivery of weekly or monthly shopping from supermarkets. The vehicle fleets and other machines operated by state and

semi-state bodies should be electrical rather than carbon emitting. In this regard the work of Sustainable Nation Ireland should be fully supported by the Irish Government.

15. **Job Creation:** Both the retrofitting of buildings and the implementation of alternative energy programs can create much more jobs than would be lost in eliminating dependency of carbon as in the case of peat stations. The government created Citizen's Assembly has come out strongly in recommending the decommissioning of the peat stations. In the case of alternative energy there are greater possibilities if schemes at the local community level are implemented involving training agencies, technical training programs for youth and the creation of SMEs to develop the programs. A range of jobs and up-skilling is possible with supervisory roles and operative positions created at different levels. In the case of solar energy micro local initiatives are desirable rather than using up large tracts of land to create solar land banks.
16. **Age Friendly Communities** It is commonplace now to view senior citizens in their declining years as a burden to the state and the community. This is a stereotypical response and can be seen in the portrayal of the elderly in the mainstream media and to a certain extent in the political sphere. Western society has a lot to learn from other societies in this regard. The role which senior citizens have played in their working lives and which very many who are in good health still play after retirement should be more clearly and specifically spelled out and should be seen to create a definite and clearly defined dividend in later years. This is not the portrayal rolled out in present day Ireland where the elderly are often portrayed in negative terms and too often as a burden. For example commonly used terminology such as 'bed-blockers', a seriously derogatory term has crept into everyday media parlance. Such terminology is hugely discriminatory. In the paragraphs on Education and Life Long Learning there is no mention of the aged cohort in the paragraphs of the plan. The aged are excluded from participating in many processes and arguably ageism is now the greatest sphere of discrimination arguable in Ireland, both in terms of private and public sector spheres.
17. **Forestry:** The section about forestry could well be expanded, for example with an aspiration to move from the predominantly grown non-native exotic species Sitka Spruce to the growing of Ireland's native hardwood trees. The acidic nature of the conifer plantations affect many of the spawning grounds in rivers. Angling is thereby seriously affected in some areas for example in Co. Leitrim. Furthermore, the use of persistent carcinogenic pesticides which damage the immune systems, currently in use in the forestry sector needs to change. The growing of Ireland's native hardwoods is desirable in order to reduce the importation of hardwoods from the rainforest areas. Per capita Ireland imports more hardwoods from abroad than any other EU country. The growing of our native broadleaf trees is highly desirable from an aesthetic point of view which would be likely to have a beneficial effect on tourism in the country areas. More space needs to be given to the multiple roles of trees not only in carbon sequestration but also in flood control, mitigating pollution, enriching the soils, both in urban and rural areas.
18. **Agriculture:** Agriculture provides much employment. However Agriculture accounts for up to 35% of CO2 emissions. The problem of methane, more than twenty times more heat retentive than CO2 needs to be fully addressed. The family farm could be a source for the utilisation of the gases produced in the farming processes. The use of new technologies

could make the family farm more economic. Models of best practice and innovation need to be urgently introduced.

19. **Hemp:** It has been said with some truth that the plant hemp could save the rainforests one of our main oxygen suppliers and by implication planet earth. Hemp has myriad uses for example in construction, food source, clothing, rope making, car manufacturing, paper making and medicine. It is an extremely versatile product and is fire resistant. It is a fast rotation crop with low production costs in contrast to trees. No herbicide or pesticide controls are needed. It is non-invasive. Many varieties of the plant exist.
20. **Flooding mitigation and porosity** – More and more hard surfaces are being created in the case of motorways new road systems and construction generally. It is commonplace now that gardens which were traditionally green areas are now being paved. This is not an ideal situation and decreases the areas of porosity. Mitigation measures are called for and financial incentives introduced in the context of the need to reduce fast run off in heavy rains and more severe flooding. Research has shown that well planted areas mitigate flooding. In this regard the following objective of **Ireland 2040** is very important and welcome: **“Green adaptation which seeks to use ecological properties to enhance the resilience of human and natural systems in the face of climate change, such as creation of green spaces and parks in an effort to counteract the urban heat island effect”.** **This objective needs to be fleshed out in great detail to be effective.** In this context the suggestion of building on green spaces in the case of Dublin city would be regressive.
21. **The Traveller Community-** This group is highly marginalised very inadequately supported. Seriously insufficient resources are made available to enable them to play a more meaningful role in society while retaining their identity.
22. **Housing:** The Society of Chartered Surveyors have pointed out that the higher you go the more expensive it is. Although that is the case in some situations there are very good reasons to build higher, for example in the inner city, where land is at a premium, or close to transport hubs and main employment centre. The objective of building carbon neutral housing as the norm rather than the exception should be a target of the plan with specific objectives and time scales. Incentives should be such as to make this transition possible.
23. **Heritage:** Ireland was once a great forest and very many of our place names refer to trees. Ireland is one of six ‘Celtic’ areas at western peripheries of Europe. They include Brittany, Scotland, Wales, Galicia, Cornwall and Ireland. The cultures which have emanated from this identity is something that is celebrated widely if becoming less understood in a fast growing materialistic world. Fundamental to the Celts were the lunar festivals of Imbolg, Bealtaine, Lughnasa and Samhan. One of the main highlights of the ‘Celtic’ year is the Festival Interceltique de Lorient, the L’Oreal festival held yearly in Brittany. These festivals give a unique identity to the inhabitants of these areas who have so much in common and so much to celebrate. from a time when Ireland was a great forest and an ethos to do with the ‘dreamtime’, mythology and ecology of what could be regarded as a Celtic psyche. Besides the Celtic lunar festivals there are There are the solstice festivals and the major festival of St. Patrick’s Day, St. Brigid’s feactical and many others including Christmas which coincides with the Winter Solstice and had its origin therein. They and many others are causes to celebrate. Unfortunately many of the modern day festivals are built around and some sponsored by the alcohol industry.

CONCLUDING REMARKS:

1. It is difficult to see how the plan 'Ireland 2040' as presently constituted can move away from the present largely laissez faire 'muddling through' approach which sees many areas marginalised and relatively deprived and where the status quo prevails. This approach is exacerbated by the plan's vision of concentrating development on several large urban areas. There is a great danger that this will result in inadequate structural change with a lack of empowerment in the case of the marginalised areas and groupings/categories. In this context the drift from rural to urban will not be addressed adequately. Specific objectives are imperative.
2. New dynamic structures are called for if the entire of Ireland is to move forward in an equitable way. The old model based on counties, regions (groupings of counties) and national is largely outdated. More creativity is needed and there is the genesis of such an approach in the creation of 'The Wild Atlantic Way' This can be seen as a new paradigm and the beginning of a sustainable and empowering structural approach. A logical outcome of this functional approach could see Ireland with several distinct and complementary zones, including ; a) Wild Atlantic way (already highly successful), followed by b) the midland counties (Midland Magic) (possibly subdivided into midlands north and midlands south); c) A North Western Coastal zone, centred around Donegal and adjoining areas; d) a 'border counties' zone of Monaghan, Cavan, Leitrim, (Irish Republic), coupled with Fermanagh, Tyrone, Armagh. A cross border approach is possible here and in the case of a 'Donegal' zone; e) The entire East Coast (including South East) could be approached on the same promotional basis as the Wild Atlantic Way; The North east coastal counties (outside jurisdiction; f) A South West zone; In such a structured approach the zones could function as complementary but separate zones with subsidies based on needs and relative deprivation. Budgets ideally would tackle specific needs of each zone and the disparities that exist between towns and villages within each newly defined zone. A high degree of autonomy could be afforded to make this work. This could get away from the traditional county based semi-political ethos which to some extent has plagued progress towards sustainable rural communities.
3. Ireland 2040 should provide examples of best practice with regard to the different elements and topics in the plan, at least by link or reference to research. For example in the case of senior citizens there are best practice models, e.g. the Cuban model and innovations such as responses to Alzheimer's, in the case of Holland where an entire village has been created built around the needs and safety of the 'villagers'.
4. **Ireland 2040** should show a greater degree of innovation in ideas and planning. Much of the ethos of the plan is based on an economic model of western society which can be regarded as outdated, whereby the 'free market' is relatively untrammelled. The plan should ideally refer to alternative models at least to indicate that structural change is possible globally and locally. Deficiencies in the present models which fail so many citizens should be referenced.
5. In energy terms the name **Tesla** and the innovations he promoted but was unable to have implemented could be referred to as an energy based approach is a valid starting point for the plan.

6. **Plan proofing:** The plan needs to be proofed and cost benefit analysis applied in determining the allocation of resources whether financial or personnel. The plan should be proofed from environmental, social equity and economic aspects with agreed weighting to achieve certain outcomes. For example investment in motorways/roads Vis a Vis investment in public transport/pedestrianisation/cycling, broadband, tele-working and tele-conferencing. Other aspects to be plan proofed examined is the societal benefits of investment in deprived areas especially inner urban areas and deprived rural areas and crime reduction. This aspect has been well researched over many years since the first comprehensive research was done and presented in works such as 'Street Corner Society: The Social Structure of an Italian Slum' by William Foote Whyte, Cloward and Ohlin's 'Delinquency and Opportunity Theory' and 'Family and Kinship in East London' by Wilmott and Young. There is also Emile Durkheim's classical work on 'Suicide and Attempted Suicide' and his analysis of the state causes and effects of 'anomie'. These studies have not been surpassed or been outdated and the findings of their empirical research could be factored in to the planning process in the case of Ireland 2040. The **Deis schools initiative** is an example of best practice in the Irish context- This initiative comprises 640 primary schools (328 urban/town schools and 312 rural primary schools) and 185 second level schools. Delivering Equality of Opportunity in Schools (DEIS).
7. **Partnership approach to Project and Plan development and Implementation:** A partnership approach is desirable and feasible in certain circumstances when public service aspects are not being jeopardised. This partnership approach could work well in the case of the development and fine tuning of the technologies for broadband, tele-working and teleconferencing.
8. **Lobbying:** It has been pointed out that certain organisations have easy access to lobbying of government thereby creating the possibility of influencing decision making inordinately. This has been described as part of 'a revolving door syndrome'. Though not part of the plan, Government needs to seriously look at how plans can be seriously skewed in particular directions to promote the interests of special interest lobbying groups.

CONCLUSION: Ireland 2040 scores most strongly on physical aspects of the economy and infrastructural aspects to make it work well mainly on a macro scale. Where it is weakest is at the micro scale and in the empowerment and constructive involvement of the marginalised particularly in terms of social equity and environmental conservation. A key test will be the question as to how will small towns and villages like Kiltyclogher or Kiltimagh or Carndonagh or Graignamaanagh or Mucker/Inniskeen, or Ballydehob, or Ballyragget, Sixmilebridge, Ballinafad, Kilsaran or Cape Clear or any of the offshore islands of Ireland or deprived inner city areas, benefit from this plan and be part of a truly sustainable **Ireland 2040**.

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