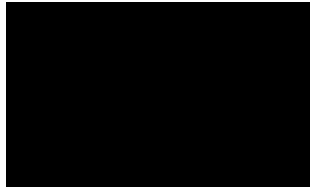


## Submission to Draft Ireland 2040 Plan

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I have read the Draft Ireland 2040 Plan and would like to comment on some points that are relevant to my area. I acknowledge the many good points in the plan but for the purpose of this submission, I shall concentrate on where improvements may be needed. As a result, my comments may seem negative but the purpose of this submission is to point out deficiencies in the Plan where appropriate and to make constructive suggestions.

In general, while there is much to be praised in the plan, it is disappointing in as far as it deals with the north-west of Ireland and Donegal in particular. To the casual observer, it could be seen as a plan for the southern half of Ireland, the area south of the Dublin - Galway line. While the city of Derry cannot be directly considered as part of the plan, it should be given equal status with the other named cities in terms of connectivity etc. Not enough emphasis is given to the proposed Dublin - Derry/Donegal motorway project or the Derry - Galway route. This is a major failing in the plan and one that will leave it open to accusations that it is indeed "Business as Usual" where discrimination against the north-west in terms of investment is concerned. In reading the plan, Rev. Ian Paisley's phrase "The Dublin Government" comes to mind.

Another major failing in the plan is that it tries to impose values and ideas that are alien to many who live in rural areas and proposes to do this from the top down, against the wishes of the majority. Examples are to be found in proposals on land use, climate change, 'inclusion' and in particular, a failure to utilise the benefits that the Irish language and culture can bring to remote areas in terms of developing the tourist market.

The whole Political Correctness agenda that is driven by a minority of people who consider themselves to know what is best for society has gone too far and is a direct threat to Irish society as it leaves many people disenfranchised, with their views being disregarded. Such people withdraw from the political system and have no outlet for their frustrations. The one-sided and pre-rigged so-called Citizen's Assembly is a good example.

The 2017 Pobal HP Deprivation Index has identified Co. Donegal as the most deprived area in the country and the 2040 Plan is not doing enough to address this issue.

There are many external threats to the Irish economy and way of life, ranging from economic collapse of the Euro zone due to loose monetary policy, to possible 'black swan' events. Basic preparations for such an event should be made in each area. This should be included in the 2040 plan in order to bring it to public attention.

## **1.1**

### **Opportunity**

*"A sense of fair play and opportunity for all"* is mentioned but this is only a sad illusion. In trying to cater for vocal minorities, you are excluding the silent majority.

Examples of this would be the influx of foreign nationals into the country as forced upon us by the corrupt European Union and with the blessing of a weak and ineffectual Irish government.

### **Creativity**

Ireland has become overburdened with laws, rules, regulations, and red tape. There is a tipping point where regulation is concerned and beyond that point, it takes a stranglehold on society resulting in stagnation and lost opportunity. Irish society is now well beyond that point and change is needed.

### **Proposal 1:**

That Seanad Éireann initiates the process of examining all laws and regulations relating to the Irish Republic and sets out to minimise or rescind all unnecessary laws and regulations. This should become the main work of the

Seanad and that the passing of new laws and regulations should not be the main justification for keeping the upper house in existence.

### **Proposal 2:**

That a state committee should be set up with the sole task of simplifying all types of official paperwork.

### **Connectivity**

**Draft Report:** *“It is a reasonable target for most people to have no more than a 30-minute commute time to work and for most people and goods to have access to international connections within 90 minutes of their home or work base.”*

This target can only be met in rural areas and small towns with the provision of jobs of suitable quality in the local area. Bodies that are tasked with providing such jobs, such as the Industrial Development Authority and Údarás na Gaeltachta are failing to deliver. There were something like 7 site visits organised by the IDA to Donegal by potential foreign investors in the years 2009 – 14, compared to 995 to Dublin.

Many of the jobs that are being provided are poorly paid, with third world working conditions. Consequently, the brightest and most well educated individuals are moving out of these areas, never to return in many cases.

The 2040 plan proposes to make this situation worse by concentrating investment in the cities and large towns.

### **Self-Reliance**

The ‘bottom-up’ action and imitative in your plan is being seriously hampered by unnecessary and cumbersome Government regulation.

Additionally, the life-blood of local voluntary committees has been cut off by the lack of available participants in part-time schemes. People who would have previously qualified and would be more than willing to partake in such schemes are being high-jacked by private companies who are being paid to operate ‘back-to-work schemes’.

### **Example:**

The Gweedore Chamber of Commerce and Tourism is unable to employ a part-time secretarial worker due to available people being forced into the People First schemes.

## **1.2 The National Spatial Strategy (NSS) - Lessons Learned**

It looks like another case of ‘winners and losers’ and as always, the northwest is in the losers category.

### **1.4 | What Happens if We do Nothing?**

**Draft Report:** *“As the expertise that is needed to compete successfully internationally, together with supporting services and the increasingly important cultural offering, tends to concentrate in major urban centres, each part of Ireland needs to provide the opportunity for focused development.”*

This aspiration is likely to end in failure unless there is a major change of thinking among those who are tasked with delivering it. People who are too long in one place or who are of a certain age do not want to rock the boat and make more work for themselves.

## **ELEMENTS OF THE STRATEGY**

### **OUR REGIONS AND RURAL FABRIC**

**Draft Report:** *“Targeting a level of growth in the country’s Northern and Western and Southern Regions combined to match that projected in the East and Midland Region (which includes Dublin).”*

*Enabling, through the Regional Spatial and Economic Strategy (RSES) process for each Regional Assembly area, targets for large towns as potential regional growth drivers for their surrounding catchments Reversing small town and rural population decline and supporting the sustainable growth of rural communities.”*

These are fine words on paper but the reality on the ground is much different.

### **Example 1:**

The linear settlement along the coast of Gaoth Dobhair (Gweedore) in Co. Donegal does not fall into any of the categories mentioned in the draft plan. This is said to be the most densely populated rural area in Europe and as a result, it is as urban as it is rural in character. The area between Bun Beag (Bunbeg) and Na Doirí Beaga (Derrybeg) is just under the population threshold to be considered as a town (1,491 in the 2016 census).

Consequently, the area has suffered from a lack of investment. A pilot sewerage scheme is about to commence but it has taken a sixty year fight to get even this limited scheme.

**In attempting to avoid EU fines, Irish Water is concentrating on bringing existing water treatment plants up to standard, at the expense of areas that have no scheme.**

The Bunbeg - Derrybeg area has also been deprived of other services. For example, a nearby English-speaking town has been designated as a Gaeltacht Town, at the expense of Gaoth Dobhair, the result of political manoeuvring, and stroke politics of the worst kind. Is this type of decision-making likely to change as a result of your plan?

## **COMPACT GROWTH**

**Draft Report:** *“2.4 How to Build Stronger Regions - Accessible Centres of Scale National Policy Objective 2c*

*Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key eastwest and north-south routes.”*

*“Will be improved”* is an extremely vague term. What is the planned standard to which accessibility is to be improved? Is it going to be motorways such as the plan is suggesting for other parts of the country or simply removing a few bends in the road? What is the time scale for these improvements?

## **Galway**

Motorway connection between Galway and Derry does not seem to be a priority in this plan. **This is a major failure in the plan.**

## 4 PLANNING FOR DIVERSE RURAL PLACES

**Draft Report:** *“4.1. Planning for the future growth and development of rural areas, including addressing decline, with a special focus on activating the potential for the renewal and development of small towns and villages. Putting in place planning and investment policies to support job creation in the rural economy. Addressing connectivity gaps. Better co-ordination of existing investment programmes dealing with social inclusion, rural development and town and village renewal”.*

There are many barriers to rural development and unless some of these are removed, the plan will fail in its stated objectives.

### **Example 1:**

A large tract of land in the Co. Donegal area of Cloughaneely and Gweedore has been designated as a Special Area of Conservation. This has resulted in local people being unable to carry out even the most basic works on their land and is completely contrary to developing a sustainable community.

Officials from the Office of Public Works have 100% authority in dealing with this issue and they do not seem to be accountable to anyone. One reason for the SAC designation was to protect the rare bird, the corncrake. The ‘top-down’ approach has turned people completely against the unfortunate bird and the people who are best able to manage the land are being persecuted by petty officialdom. This is a first class example of fine plans on paper but **stupid action on the ground.**

### **Example 2:**

One of the most valuable assets along the west coast, the fishing grounds, have been sold out to the EU in return for farming subsidies. At the present time, foreign super trawlers and factory ships are plundering these fishing grounds at will, with little or no inspection from Irish Fishery Patrol vessels. These boats suck up ALL types of sea creatures without distinction and additionally, they destroy the fishing gear of small local fishing boats.

Meanwhile, the local boats are hounded by Irish patrol vessels and are tied up at the harbour for much of the time. Local fishermen are barred from fishing for plentiful species, fishing that would alleviate the pressure on species that they are permitted to fish. Nobody in Dublin is listening to the concerns of these fishermen.

**This sort of plan may rightfully be regarded as a sad joke by the fishermen who are enduring this injustice.**

### **Draft Report: “National Policy Objective 13**

*Protect and promote the quality, character and distinctiveness of the Irish landscape, the sense of place and culture that make Ireland’s rural areas authentic and attractive as places to live, work and visit. The Action Plan for Rural Development up to and including 2021 supports this objective and thereafter a review of the Action Plan for Rural Development is to be undertaken to ensure alignment and consistency with the National Policy Objectives of this Framework.”*

### **Invasive Species**

The progressive problem of invasive species has not been addressed or even mentioned in the draft plan. This is a major problem in many parts of rural Ireland, impacting the landscape and waterways and one that needs urgent attention.

Local Authorities, who incidentally are responsible for the spread of many invasive plants through roadworks, are failing to take responsibility for the problem.

### **Urgent Proposal:**

That a national co-ordinating committee be established with the sole purpose of controlling and eliminating invasive species.

### **4.3 Planning for the Future Growth and Development of Our Rural Fabric**

**Draft Report:** *“There are many towns and villages with populations of more than 1,500 people that are intrinsic to sustaining viable rural communities and do not function independent of their rural hinterland. In planning for the future*

*growth and development of rural areas, 'rural' is considered to include towns and villages up to a population of 10,000 people."*

## **Business Rates**

The issue of business rates continues to be the final nail in the coffin for businesses in rural areas and small town.

### **Example:**

The small coffee shop or hairdresser in Bunbeg - Derrybeg, with a limited catchment area and/or a short business season is subjected to the same business rates as a large multi-national business in the town of Letterkenny.

This has been an issue for small businesses for many years but yet successive governments have buried their heads in the sand. **This plan will be deemed to have been a waste of time unless it addresses the issue of business rates.**

## **4.4 | Rural Towns**

**Draft Report:** *"In rural Ireland many people seek the opportunity to build their own homes, but find it difficult to do so in smaller settlements because of a lack of available sites and services. In order to assist this, local authorities will be supported in undertaking the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages".*

The biggest obstacle to people building their own homes is the absurd amount of unnecessary regulations.

## **4.5 | Open Countryside**

**Draft Report:** *"It is recognised that there is a continuing need for housing provision for people to live and work in Ireland's rural areas. Careful planning is required to manage demand in our most accessible countryside around cities and towns, focusing on the functional requirements of rural economies and rural communities and in compliance with EU treaties, whereas remoter areas should benefit from a more flexible approach, particularly where it helps to sustain fragile communities".*

It would be a good idea to point this out to planning officials.



## 4.6 | Planning and Investment to Support Job Creation

**Draft Report:** “Recent research indicates that some of the key challenges facing business development in rural areas, particularly less densely populated areas include access to finance, communication and logistics, access to knowledge”.

The key challenge is **Business Rates**.

**Draft Report:** *“Ireland’s rural resources are some of our biggest assets and through the development of the agriculture, food, forestry, tourism and renewable energy sectors, the sustainable harnessing of these assets will not only sustain local employment but also contribute to driving the national economy.”*

You have totally disregarded one of the most important assets, the language. This plan is seriously flawed as a result.

### **Tourism**

Fáilte Ireland has failed to deliver in rural Donegal, although they have now been forced to acknowledge The Wild Atlantic Way. The past policy has been to trap the tourist in Bundoran, Donegal Town and Letterkenny. Little effort has been made to promote other areas and this needs to change.

### **Energy Production**

Alternative energy projects cannot be imposed on communities against their will.

### **Circular Bioeconomy**

This offers great potential for utilising land that has been left unused due to the change in farming practices and the lack of return from small patches of land. More should be done to work with local communities in order to identify and develop income streams from these activities.

## 4.7 | Addressing Connectivity

**Draft Report:** *“National Policy Objective 22*

*Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.”*

There is a need to have people in relevant positions in the IDA and Údarás na Gaeltachta take responsibility for broadband services in their industrial and business parks. Very often, the infrastructure is there but it remains unused due to a lack of understanding and promotion.

## **Case Study**

### **Connemara West - Letterfrack**

This is a model that could easily be replicated in other areas and the idea should be strongly promoted.

### **National Policy Objective 25**

**Draft Report:** *“Facilitate the promotion and creation of sustainable community development and support community organisations in their work to provide for a more sustainable future”.*

The lack of people for part-time schemes, already mentioned above, is a major obstacle to this objective.

## **5.3 | Healthy Communities**

Because of the remoteness of Donegal from Galway and other cities, Letterkenny University Hospital needs to be recognised as a Regional Hospital.

The hospital is unable to cater for the needs of the population and the travelling distance to other hospitals is too long.

This is a major concern for the population of Donegal and there is a perception that the county is being discriminated against in comparison to eastern and southern areas.

### **Is the 2040 plan going to address and rectify this issue?**

## **5.5 | Diverse and Inclusive Ireland**

**Draft Report:** *“In moving towards a more diverse society over the last half century, Ireland’s population is more varied than ever before comprising a range of ethnicities and nationalities. Coupled with changing societal values that embrace inclusivity for civil marriage rights and family composition, Ireland’s progressive efforts and actions to grant equality to all citizens as part of a fair and just society is striking. However, providing access of opportunity to citizens of Ireland is not a finite exercise particularly where distinct and tailored solutions are required to continually address the needs of our citizens, particularly those who remain vulnerable or marginalised. 5.5 | Diverse and Inclusive Ireland Planning affords an opportunity to facilitate and deliver a more socially inclusive society through better integration and greater accessibility at all stages of the life cycle. Housing, education and transport are three key areas where social inclusion can be better achieved. For example, through better universal design of buildings to deliver greater accessibility for all, or co-location of community uses to ensure communities are active during the day and into the evening. Ireland 2040 supports continued development towards achieving a more progressive and inclusive society that supports our citizens’ basic human rights and assists in helping people to gain access to a better quality of life.”*

This is an important area where the plan has veered away from what the public wants in order to cater for the vocal minority.

There is no recognition in your plan for the silent majority who do not share your views on such topics as abortion, gay marriage, the influx of foreigners, and the whole political correctness agenda.

There is a policy of destroying the values that many Irish people hold dear. This is done under the guise of ‘diversity’ etc. and is achieved by attacking the church, trying to re-define what it means to be Irish, putting down the language and culture and a host of other silly P.C. ideas. Some of the things that are going on at present would be funny if they were not so sad.

This is all part of a wider EU agenda to destroy national identity and to make people easier to brainwash and control.

Your plan has deliberately or accidentally chosen to promote this foreign agenda and for that reason, it is not the plan of rural Ireland.

## **Gaeltacht Areas**

One of the most disappointing aspects of the 2040 Plan is the almost total neglect of the Gaeltacht and language issues. The Gaeilge language is attracting great attention in many parts of the world and there is a great tourism opportunity as a result. Other countries would cherish such a valuable asset and would do their utmost to promote and preserve their language.

### **5.6 | Education and Life Long Learning**

National Schools are at the heart of the community. Yet, many of these schools are struggling badly because of a lack of investment.

### **5.7 | Housing**

Whereas it is important to discourage ribbon development, there must be provision for the building of single, owner-built houses. Unnecessary regulation is a big obstacle to the building of such houses.

### **National Policy Objective 35**

**Draft Report:** *“Implement measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%).”*

This must not be done by increased taxation of vacant houses. There are many legitimate reasons why a house could be unoccupied and we must not return to the policies of the British landlords by taking away people’s rights to private property. Politicians who fail to grasp this principle will do so at their own peril.

## **6 Realising our Island and Marine Potential**

Failure to protect fishing grounds from large foreign trawlers and factory ships and penalising small local fishermen, as previously mentioned are some of the greatest barriers to realising island and marine potential.

Another threat comes from the awarding of offshore or foreshore licences to outside entities against the wishes of the community. Examples would be the development of shellfish farms, renewable energy schemes and the harvesting of seaweed.

## 6.2 | Maritime Economy

### Draft Report: *“National Policy Objective 41*

*Support the growth and development of the maritime economy, particularly in remote coastal communities and islands”*

This should be done with the support of the local community.

## 7 Working with Our Neighbours

### 7.2 | Ireland and Northern Ireland

#### Draft Report: *“1 Working Together for Economic Advantage*

- (i) Dublin-Belfast Economic Corridor*
- (ii) North-West Strategic Growth Partnership*
- (iii) Cross Border Local Initiatives*

## 2 Co-ordination of Investment in Infrastructure

- (i) Mobility and accessibility*
- (ii) Energy*
- (iii) Communications*
- (iv) Tourism”*

This requires political will that has thus far been absent as far as hard investment is concerned, as it pertains to the northwest. Time will tell if this plan is genuine or if it is more of the same – business as usual.

### 7.3 | Working Together for Economic Advantage

#### North-West Strategic Growth Partnership

#### Draft Report: *“National Policy Objective 47*

*Promote the development of the North West City Region as interlinked areas of strategic importance in the North-West of Ireland, through collaborative structures and a joinedup approach to spatial planning.”*

The lack of emphasis on developing the Derry - Dublin and Derry - Galway roads network would tend to suggest that this is just an afterthought, designed to divert attention from the ‘South of Ireland 2040 Plan’.

## **8 Realising Our Sustainable Future**

While planning for a sustainable future, it is important to remember that people are a part of the equation. Present policies may help the environment but make it impossible for then human population to live on their own land.

### **Climate Action and Planning**

**Under Ireland 2040, the Government will support:**

Blind adherence to one side of the climate change argument is not a healthy position to take. There is much to be learned about the causes of climate change but a closed mind can learn nothing.

A degree of honesty is required.

Is climate change a good excuse to justify the imposition of unpopular taxation measures?

Whose interests are best served by the climate change hysteria?

Are you penalising sections of the population who rely on motor transport while investing more in public transport for the cities?

Are you repeating the mistakes of the landlord era by putting restrictions on what people can do on their own land?

There is a perception among rural dwellers that well-heeled city people who enjoy many advantages are trying to dictate policy regarding rural life.

You cannot change people’s minds through taxation or dishonesty.

### **8.3 | Protecting Conserving and Enhancing our Natural Capital**

**Green Infrastructure, Biodiversity, Natural Heritage and Landscape**

**Draft Report: “Biodiversity**

*Recognising the important role of planning to enhance biodiversity and ensure greater environmental coherence to the planning system. At a national level, certain habitats and species are legally protected by within the Natura 2000 network<sup>29</sup>, incorporating the terrestrial series of Special Areas of Conservation (SACs), with additional marine SACs and Special Protection Areas. The majority of our habitats that are listed under the Habitats Directive are considered to be of ‘inadequate or bad conservation status’, with less than 10% considered to be in a favourable state<sup>30</sup>. As a nation, we therefore need to do more. The importance of our biodiversity is not restricted to legally protected areas and there are a range of measures in place to protect species and habitats in the wider countryside. In this regard, the Habitats Directive contains obligations to protect certain species wherever they occur, while the Birds Directive contains protections for all birds, and they may only be disturbed or controlled subject to licence or derogation, as appropriate. The Environmental Impact Assessment Directive also requires that the direct and indirect significant effects of a project on biodiversity, with particular attention to species and habitats protected under the Birds and Habitats Directives are identified, described and assessed as part of the consent process. The diversity of our biological communities is also important for the quality of our water, soils and as a source of food. Land use change and pressures from urbanisation can have a direct and indirect impact on Ireland’s habitats and species.”*

## **Invasive Plants**

Invasive species, in particular, invasive plants are a great threat to biodiversity, but yet this problem is not addressed in the 2040 Plan. This is a serious omission that should be corrected before the final report is published.

The problem requires not just a mention in a plan, but urgent action.

## **8.4 | Creating a Cleaner Environment for a Healthy Society**

### **Draft Report: “National Policy Objective 61**

*Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy*

*efficient buildings and homes, green infrastructure planning and innovative design solutions.”*

In promoting energy efficient buildings, it would be wise to restore house grants that were previously available for window and door replacement etc.

## **9 Investing in Ireland 2040 – Implementation**

**Implementing the Ireland 2040 Framework will be guided by targeting the following national strategic outcomes:**

**Draft Report:** *“Empowered Rural Communities: Rural areas play a key role in defining our identity, in driving our economy and our high-quality environment and must be a major part of our country’s strategic development to 2040. In addition to the natural resource and food sector potential as traditional pillars of the rural economy, improved connectivity, broadband and rural economic development opportunities are emerging which offer the potential to ensure our countryside remains a living and working community”.*

This requires an approach that does not discriminate against one half of the country, something that has always happened in the past. Dublin based officials are ‘south-facing’ and that is where the investment is focused.

### **9.2 | Governance**

**Statutory Backing for Ireland 2040 and Establishment of the Office of the Planning Regulator**

All parts of the country should have equal input and representation on the proposed new body.

### **9.3 | Ireland 2040 and the National Investment Plan**

**National Strategic Outcome**

**Compact, Smart Growth**

**Draft Report:** *“Enhanced Regional Accessibility*

*Once Smart Growth objectives are being achieved, further development of connectivity between centres of population of scale will support the objectives of Ireland 2040. This will focus initially between Cork and Limerick. Better*



*accessibility between the four cities separate from Dublin and to the Northern and Western region will support the objectives of Ireland 2040. Enhancing accessibility to the North-West will enhance the competitiveness and attractiveness of areas most exposed to the potential impacts from Brexit.”*

**This is a worrying paragraph and perhaps it brings out the true intentions regarding the development or lack of development of the northwest. The northwest area has been deprived of investment since the foundation of the state and consequently, the area should be at the top of the list, ahead of areas that have already experienced substantial investment.**

**Draft Report:** *“Accessibility to the North-West Upgraded access to the North-West border area, utilising existing routes (N2/N14/A5).*

*Progressive development of the Atlantic Economic Corridor from Galway northwards by completion of the M17/M18, upgrading sections of the N17 northwards, where required and upgrading the N15/N13 link.”*

Utilising existing routes is not good enough as the northwest deserves the same motorway structure as the rest of the country.

“

Upgrading sections of the N17 northwards, where required and upgrading the N15/N13 link” is an extremely depressing statement. Minor upgrading over several decades is not what is required.

### **Access to Quality Childcare, Education and Health Services**

Letterkenny University Hospital needs to be afforded Regional Hospital status in order to attract the necessary staff and investment resources.

### **Conclusion**

As stated at the start of this submission, there are many good points in the Draft Ireland 2040 Plan and I acknowledge those positives. However, as I have read through the plan for the second time, I cannot feel hopeful that much will be different for the northwest. It looks like business as usual.

P.J. Ó Domhnaill.

