

To whom it concerns,

Having read the NDF plan I have several items I would like to address.

Firstly I would like to say I appreciate the effort that has gone into putting this plan together. I thank the authors, their collaborators and any members of the public who, in whatever way, contributed to document we have in front of us.

As for the document itself I think upon reflection it is too aspirational in tone and does not state clearly in quantifiable terms what we propose doing by 2040. Phrases like 'Revitalising communities and supporting them' is nice sounding and similar phrases are scattered throughout the document, but in real terms they set no conditions, time-frames on individual actions and give us no way to measure our success or failures. Overall, and with only some exceptions, the document does not commit us to almost anything.

One objective that stood out for its clarity of purpose was

Objective 35: Implement measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%).

The first part is vague, provides no clear strategy and is fairly flat but at least the second part sets out to do something and can be measured. If we reach 5% then it's a job well done, at least by the terms set out, if we don't then we have more work to do and can check why we have not succeed and try address those problems. Also as the years go by we can see what progress we are making and if we are in line to meet our goal. That is an objective you can explain, monitor and manage.

In contrast we have other objectives which are difficult to understand. If the government want the public to buy into the plan, then we must be able to ascertain without confusion what is being say.

Objective 56: Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions

The objective is very wordy and has to be broken down into chunks for people to get an understanding of what is involved. It's not easy to comprehend and suffers from trying to say too much and loses it coherency in the process. If that's an objective you will struggle to communicate what it means and what success or failure will look like.

Then we have phrases like the one in the 'Common Aims of Terrestrial and Maritime Planning'

Sustainable, forward looking, long term use and management of areas

This sounds innocuous enough but is not substantive or clear and is too open to interpretation, jiggery and falling into policy cracks. The plan is riddled with this sort of language which actually contributes very little to the debate and doesn't help figure out what needs to be done. Every sentence in a document purporting to set out a vision for the country must be useful and should say something substantive.

I find the differences between the comments submitted in the first round and this document to be quite striking and should be looked at a bit more to get a sense of the public's views. The public's comments were quite matter of fact, set out sometimes fairly unambiguous issues for addressing or set out their proposed solution whereas this document does very little of that. I would not say all the

comments were sufficiently thought out and some were very localised and a bit winding and tangential but they were for the most part straight forward. They left you in no doubt about their intentions or message. This document for the most part does not share these traits.

Ultimately any document of this kind is about stating and setting out priorities and giving clear steps for how to achieve them. I don't think this plan does that sufficiently well and will suffer for it. Without clear, unambiguous commitments then you can't take action. You will be held to ransom by events you have not prepared for and ineffective course changes are more likely because you don't in reality know clearly what the goals are and how to get there step-by-step.

Thank you for your attention. I hope people reading this understand I write this in hopes of contributing rather than being destructive and am happy to discuss any and all of what was said in further detail and to make additional contributions.

Thank you for the opportunity.

With kind regards,

Cearúil Swords