

2 November 2020

County Development Plan consultation process,
Clare County Council,
New Road,
Ennis,
Co. Clare.

Re. FH Wetland Systems ltd. Submission on the Draft County Development Plan

Dear Sir/Madam,

As a business owner in Clare, environmental consultant, parent, and member of the community in the county I am very concerned about some of the directions that we are taking as a society with respect to the current climate and biodiversity emergency. There has been a distinct lack of tangible climate and biodiversity action on the part of government generally and it is my hope that the new County Development Plan for Clare will help to encourage and facilitate constructive behavioural changes in government, business, agriculture and across all sectors and levels of society in the county.

I wish to highlight that former president of Ireland Mary Robinson has made it very clear that even with full adoption of all Paris goals, these are not adequately ambitious to keep global temperature increases below 2°C¹. The 2019 IPCC Report² also makes abundantly clear that going above this temperature will be devastating to many of the life support systems of the planet. There is a 93% chance of exceeding 4°C by the end of this century, “survivable by small, resilient and indigenous groups of people”³. Thus we are not simply discussing whether we can continue to generate ever greater economic growth in our county or country by building a green economy. We are looking at a scenario whereby our existence as a society, if not as a species, may well become impossible.

In general terms, governments at local and national level underestimate the seriousness of species mass extinctions and climate change, as reflected in the lack of ambitions of the goals that they set out, and in the lack of follow-up on the existing goals. Following are some measures which have been demonstrated to be effective at providing carbon sequestration and offering greater resilience to climate breakdown and species extinction; essential parts of any county development plan. I urge you to incorporate these into the plan document and act upon them with all the urgency that the situation requires.

The following measures include resilience measures that are designed to support biodiversity and water quality since these are inextricably linked to our resilience as a healthy community in Clare in the context of climate breakdown and biodiversity loss.

- 1 Robinson M (2018) *Climate Justice: Hope, resilience and the fight for a safe climate world*. Bloomsbury Publishing, London, UK.
- 2 IPCC (2018) 'Special Report - Global Warming of 1.5°C'. *Intergovernmental Panel on Climate Change*. <https://www.ipcc.ch/sr15/>
- 3 Maddy Harland (2019) 'Editorial', *Permaculture*. Issue 101, Autumn 2019.





Energy

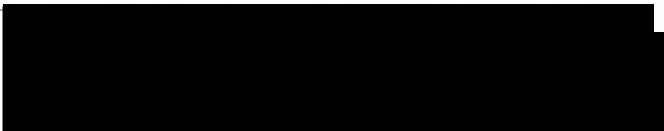
- Route all municipal sewage discharges through willow plantations and use as biomass feedstock for a converted Moneypoint facility and/or local CHP units. This measure provides clean water and carbon neutral electricity and jobs for the western regions.
- Through Clare Co. Co. planning dept. require all new housing to have zero net energy requirements (passive solar gain, low embodied energy in construction, solar hot water, PV cells, carbon sequestration in willow sewage systems etc.).
- Initiate community energy schemes to maximise the contribution of power to the grid from renewables in Co. Clare.
- Introduce incentives for schools, public buildings, churches, factories and businesses to install solar pv to sell to the grid.
- Step back from the import, exploration and/or extraction of fossil fuels in Co. Clare and encourage national government to do likewise.
- Support the development and implementation of zero energy input strategies, technologies and infrastructure to provide resilience in the community to future fluctuations in energy supply and availability. (Examples from my own area of work include reed beds vs mechanical aeration systems for sewage treatment, and there are countless others.)
- Shut down 80% of all public street lighting in Co. Clare. I realise that there is money earmarked for replacement of street lighting with LED bulbs, but at a great financial cost and only 30% energy saving. Reducing street lighting usage and lighting hours would provide potential greater energy savings at almost no cost.
- Urge national government to implement Feasta's Cap and Share⁴ proposals (or UK Tradable Energy Quotas⁵) as a matter of urgency. This would provide an immediate financial incentive to reduce energy use, and the use of energy intensive resources and services, with no net average increase in overall taxes. With Cap and Share, fossil fuel resources are limited or capped at source and then fossil fuel companies buy the rights to extract and sell energy from an equal distribution of shares.


Transport

- Extend the services offered by Clare Bus in Ennis to reduce car dependence in Co. Clare. Provide school bus collection to pick up all school children in Ennis and surrounding areas free of charge to reduce congestion, improve air quality and reduce carbon footprint of our county. (Currently children within 2 miles of the school do not qualify for a department-funded bus service.)
- Further extend the cycle lane network in Clare to provide safe travel between homes and schools and shops etc. Provide off-road cycle facilities insofar as possible.
- Provide a green-way network of cycle and foot paths on the farm side of established hedgerows along main routes. By renting land from farmers for this service we could easily develop a dense network of cycling and walking infrastructure in Clare for tourism and regular use to replace road transport for many journeys.
- Encourage use of national public transport services. Could Clare Co. Co. arrange with Irish Rail that car parking at the station be free of charge for those who are travelling on the service, for example?

4 Cap and Share website details <http://www.capandshare.org/>

5 Tradable Energy Quotas website details <http://www.teqs.net/>



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- Encourage the government to introduce free public transport on our national networks. Examples of this are already in place in certain places and circumstances in other countries and reduce car use.


Plastic and Waste

- Plastics have a high carbon footprint, particularly as the industry moves towards using gas from shale gas extraction (fracking) as the raw material – fracking has a disproportionately high carbon footprint due to gas leakage at the point of extraction, making it dirtier than coal from a climate perspective. All plastics should be phased out within the County insofar as possible.
- Introduce a deposit scheme for cans and for glass and plastic bottle collection within Co. Clare. This would best be carried out at national level, but in the absence of this it could be rolled out locally. Bar-code readers can be set to read the code on empties at the collection point so that the larger supermarkets at least would achieve closer to 100% collection than is currently the case.
- Add a till charge to small plastic bags and plastic fast food trays within Co. Clare. Edible/biodegradable trays are available and there are plenty alternatives to plastic bags.
- To protect marine biodiversity provide micro-plastic filtration at all municipal sewage discharge points and at all stormwater runoff points from roads. Roads and washing of artificial fibres are the two main sources of ocean micro plastics. Note, the cost could be offset by a small tax on all artificial fibre clothing sales in the county and on tyre sales, the two main sources of global ocean micro plastics.
- Introduce drinking fountains in all schools and public buildings and prominent points in towns and villages – designed to allow direct drinking and own-bottle refilling; fed from tap water only so no filters need to be replaced. Hand in hand with this a catchment protection project should be initiated in the Drumcliff Springs Catchment to protect the main Ennis water supply.
- Food waste is one of the largest sources of greenhouse gasses on the planet⁶. CCC could require all supermarkets to distribute out of date (but still good) food to homeless charities as is done in France.
- Encourage national government to introduce food/product labelling that includes food/product miles (climate issue) and the chemicals used in the growing of constituent ingredients (biodiversity issue) on product information. In the absence of government movement on this issue encourage the inclusion of food miles and associated carbon footprint on all produce and products sold in Co. Clare to allow members of the public to assess their carbon footprint while shopping; leading ultimately to greater demand for local produce and reduction in overall global transportation to Clare.
- Pursue a zero waste policy in all council offices: (e.g. buying recycled 100% post-consumer waste un-bleached stationary and similar purchasing policies).

Biodiversity

- Prioritise full wastewater treatment for all large and small urban areas within the county for essentially zero discharge to our watercourses. Treatment rates of 95% still leaves the equivalent of 5% of our whole population discharging raw sewage into our waters.
- Prioritise soil health as our main focus in agriculture within the county. This requires a move towards reducing or eliminating biocidal chemicals and maximising carbon

6 Hawken P (2017) *Drawdown: the most comprehensive plan ever to reverse global warming*. Penguin Books, London, UK.





building within the soil. This has ancillary benefits for carbon sequestration, climate mitigation, flood control, drought resilience, crop and livestock health as well as the rich biodiversity of soil itself.

- Identify and grant full protection for wild spaces within the county. The SAC maps of the county will help to guide this process, but wild protected space can be broader than just the SAC and pNHA areas. Rewilding of areas of our landscape can offer benefits for wildlife, biodiversity, tourism, carbon sequestration, economic spin-off activities such as guided walks and education, to take two examples. This is a growing area within Europe and can be a valuable part of how our county is seen from abroad.
- Remain mindful of the implications of our purchasing habits on biodiversity across the world. As we import food and other products into the county, we can have significant impacts on areas with fragile habitats, vulnerable wildlife and existing drought conditions, further exacerbating the issues in those places.

Farming, Fishing and Forestry

- Fund a series of lectures for farmers on conservation agriculture, silvopasture, continuous cover forestry, agroforestry, farm scale composting, continuous cover cropping, buffer zones, willow effluent treatment, farm-scale solar and wind.
- Seek EU, national or local funding to support conservation agriculture measures: hedgerow strengthening, woodland planting on exposed and/or marginal land, wetland introduction on farmland that is already waterlogged and difficult to farm, buffer zones along riverbanks etc. This would fix carbon in the soil, protect livestock and crops from wind exposure, help prevent or alleviate flooding downstream of the catchment etc., and provide better habitats to support wildlife.
- Highlight the value of local grass-fed beef and work with local farmers to help avoid imported GM Soy feedstock (climate issue and biodiversity issue for US soy farming regions).
- Designate protected areas off the Co. Clare coast to allow for sea-bed regeneration and fish stock regeneration. It has been shown that even protecting a modest percentage of the total sea-bed will allow a much greater percentage growth in catch value outside that area⁷.
- Work with Coillte and land owners to require or incentivise continuous cover forestry within Co. Clare (with a phased progression towards diverse and/or native deciduous tree cover to provide greater resilience against the diseases we are already witnessing as part of climate breakdown and to support biodiversity as a climate resilience measure).
- Assess the chemical loading used on Co. Clare forestry and explore options for reducing or eliminating this. Our thin limestone rich soils offer little protection of groundwater from sprays; and heavy peat and clay soils allow runoff to surface waters. Also the impact on biodiversity is great.
- Carry out a thorough inventory of mature trees within Co. Clare and provide protection of such trees. This is to preserve the distinct fauna and fungi that thrive only on mature trees. Ideally mature trees would be protected indefinitely to permit them to die naturally and thus support the suite of species only associated with natural old-growth forests.
- Explore rewilding opportunities for rewarding farmers on marginal lands who wish to reduce the time and cost inputs and establish nature areas for tourism and biodiversity. This has been done to good effect at Knepp Castle estate in England⁸. There are many

7 Monbiot G (2014) *Feral: Searching for Enchantment on the Frontiers of Rewilding*. Penguin Books. London, UK.

8 Tree I (2019) *Wilding: The Return of Nature to a British Farm*. Pan McMillan. London, UK.



[REDACTED]

potential benefits including biodiversity resilience, tourism revenue, flood protection and carbon sequestration.

Water Quality and Flood Resilience

- Work at actively improving the status of rivers and streams within the county. The above measures of providing conservation agriculture support for farmers and routing municipal discharges through willow plantations would address many of the existing problems in our rivers.
- Carry out an inventory of all rivers and streams in Co. Clare and implement immediate measures to remove weirs or man-made obstacles where they are not used for power generation or other specific important purpose.
- Install a plastic-capture net or barrier in the River Fergus below Ennis to catch dumped litter, with regular removal of litter (only in consultation with a fisheries expert and ecologist to ensure that this does not act as a barrier to water fowl, fish or otters).
- Introduce catchment protection measures within the Drumcliff Springs Catchment. Benefits include carbon sequestration, water quality improvement, water supply resilience (cleaner water available for drinking in the event of a power supply interruption in the treatment and chlorination stages of the mains water supply infrastructure), flood protection and habitat provision for biodiversity enhancement.
- Introduce similar measures across Co. Clare, including hedgerow introduction (particularly on the contour line for maximum catchment benefits), deciduous tree planting, particularly on uplands and in broad buffer zones along riparian corridors, agroforestry, silvo-pasture, regenerative agriculture practices for soil building and other natural/planted catchment measures.

Awareness and Education

- Liaise with local bee keeping associations to assess their needs for healthy bee colonies. Examples of global pressures on bees include, *inter alia*, genetically modified crops with pesticides bred into the plant (measure: stop importing GM crops and their products from the USA for livestock feed), pesticides (measure: cease all use of pesticides known to be damaging to bees and other pollinators), habitat and food supply losses (measure: pay farmers for hedgerow, woodland, wetland and scrub land areas rather than only for open grassland).
 - Liaise with the Dept of Education to introduce environmental literacy in the education system. Introduce a school book rental scheme in Co. Clare to reduce resource use and carbon footprint for school books.
 - Run awareness raising workshops in every community within the county to highlight the issues of climate and biodiversity and promote and support local action. An existing network of highly educated and highly motivated people already exists in organisations such as the Irish Seed Savers Association and CELT. Utilise these sources of expertise by providing adequate resources and by making people aware of their value.
 - Initiate a Co. Clare Drawdown Project to assess the different energy draws in the county and assess the opportunities for reducing these and for introducing sequestration measures in Clare.
 - Have a climate and biodiversity update at each and every Co. Co. meeting, to provide education and information for local councillors and also to assess the progress being made on all policies and how they impact on climate and biodiversity.
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Other Measures

- Re-examine the County Development Plan with a specific focus on the climate and biodiversity emergency and highlight all changes that could be adopted - and then start to adopt those as a matter of urgency.
- Eliminate the use of glyphosate and insecticides in Co. Clare by CCC, and launch a publicity campaign to encourage farmers and gardeners to avoid their use to protect pollinators and other insects.
- Explore the options for biodiversity enhancement of parks, roads, housing estates, national parks, beaches etc. There is a biodiversity plan in Co. Clare already, but it could be greatly strengthened in light of the biodiversity emergency.
- Stop the roll-out of both 5G and smart meters within Co. Clare as a biodiversity protection measure (and to protect public health) until such time as a safe alternative is available.

The points raised above are ideas which would benefit County Clare and the wider world as we face an uncertain future. I realise that many of these measures are not readily possible to incorporate into the development plan, which is more of an overarching plan for the county and will not necessarily include specific measures. However the plan should allow for these measures to be carried out in the next phase of planning for the county, and encourage them, rather than maintaining policies that sometimes actively block progressive measures. The points above are summary points only. Ongoing assessment and reorientation is needed to ensure that as new solutions come to light can be adopted quickly and seamlessly into the plan to allow the Council to react quickly and ensure that within our county we initiate a broad and effective response to the current dual emergencies of climate breakdown and species mass extinctions.

Please do not hesitate to call or email with any questions on any of the above information.

Yours sincerely,



Féidhlim Harty

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