

Submission No: 025



An Taisce

The National Trust for Ireland



Clare Association of An Taisce



Forward Planning

Clare County Council,

New Road,

ENNIS, Co.Clare

9th November 2020

Dear Planning Office,

We welcome the opportunity to review the issues paper for the new Development Plan 2023-2029. We wish to make the following comments, which we request the Planning Authority (PA) take into consideration in the drafting, finalisation, and adoption of the CCDP, including the accompanying Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

Our submission relates to the Natural Environment and the Biodiversity Emergency as well as Climate Action.

Within the period of this forthcoming Development Plan and beyond there needs to be a great change in the way we live our lives. For instance Diesel, Petrol and Oil will no longer be used for our transport or for the warming of our homes. Gas and Electricity produced by renewal sources will be used the coal and especially peat will no longer be used as they are the most polluting and biggest Carbon emitters.

on behalf of Clare Association


Amy Wise

The below ideas should be considered:

Climate action

The PA must ensure that the planning, development and design of our towns, cities and schools encourages a shift from car-orientated urban patterns to walkable, cycleable, and transit-orientated development patterns.

The CCDP should include strong, enforceable policies that would promote compact towns and cities where distances between origins and destinations are shorter and with walking, cycling and public transport prioritised. This reshaping of our built environment will also help reverse inactivity levels in Ireland.

The CCDP must include policies to provide alternatives to unsustainable, urban generated dispersed one off housing, including for example, a serviced site policy.

- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
- No more commuter distances where only the car can be used. Your planning applications need to be change as soon as possible to allow this transition.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks in rural areas to avoid commuting to towns and cities.
- A local transport plan must be prepared alongside the CCDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.

In a recent questionnaire on Wellbeing" in Clare by the PPN the most important item mentioned by those in Rural Areas was the need for a rural transport system.

Water

The CCDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plans are achieved.

The CCDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).

Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government sets out the "Combined Approach" and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present.

The CCDP must include policies to provide alternatives to unsustainable urban-generated

dispersed one-off, including, for example, a serviced site policy.

The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.

The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be mandatory for all new development proposals.

Natural Environment

- The CCDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- Seek to promote biodiversity through pollinator-friendly planting and maintenance where possible for land and areas in its control, including in graveyards.
- The 14 points of the EU Biodiversity Strategy 2030 should be fully incorporated into the CCDP. The Farm to Fork policy recommendations should also be incorporated.
- The most significant demesnes and designed landscape in the county should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.
- Control the use where possible of chemicals for pest control and harmful fertilizers and weed killers.

Summary

To accomplish these goals, the CCDP should include strong and enforceable policies to promote compact towns where distances between origins and destinations are shorter and where walking, cycling and public transport are prioritised. This will help ensure the efficient delivery of services and infrastructure, enhance social capital, create compact and walkable communities, and protect the natural environment. The CCDP must also align with regional and national plans and strategies such as the Smarter Travel framework in order to implement such policies.

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