

Submission no: 064



SUBMISSION IN RESPECT OF CLARE COUNTY DEVELOPMENT PLAN 2022-2028

CLARE PUBLIC PARTICIPATION NETWORK
& CLARE ENVIRONMENTAL NETWORK

Abstract

Submission on environmental issues for consideration at the pre-draft stage of Clare County Council's County Development Plan 2022-2028.
November 12th 2020

Submitted on behalf of Clare PPN Secretariat



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Clare Public Participation Network/Clare Environmental Network Submission to Clare County Council in respect of the pre-drafting of the Clare County Development Plan 2022-2028

November 12th, 2020

Clare PPN (CPPN) is a network of 289 community, voluntary, environmental and social inclusion groups from Clare. It exists to facilitate the formal participation by the community sector in Clare County Council's policy making structures and to support communication and information sharing in the community and voluntary sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat. Clare PPN's website is www.clareppn.ie and we are on Twitter @clare_ppn and facebook.com/clareppn/

Clare Environmental Network is both a member group of Clare PPN and a network of environmental groups, individuals and organisations in the County. It exists to facilitate those working on diverse aspects of Climate and Biodiversity Emergency mitigation, environmental sustainability, biodiversity enhancement, sustainable farming and tourism to communicate and collaborate with each other.

Clare PPN hosted a consultation workshop for its Environmental College and Clare Environmental Network on November 2nd 2020 in relation to Clare County Council's Pre-Draft Consultation on the County Development Plan 2022-2028. This submission is the result of that workshop and previous work by the above groups.

We welcome this opportunity to provide input on the Pre-draft of the County Development Plan 2022-2028 (CDP).

This submission is informed by the following policy or strategy documents:

[Climate Action Bill 2020](#)

[Clare Co Co Strategic Issues Paper](#)

[Regional Spatial & Economic Strategy for the Southern Region](#)

[National Planning Framework Project Ireland 2040](#)

[National Development Plan 2018-2027](#)

[Clare Co Co LECP 2016-2021](#)

[Clare Co Co Climate Adaptation Strategy](#)

In relation to the **Climate Action and Low Carbon Development (Amendment) Bill** which is, at this date, still undergoing pre-legislative scrutiny, CPPN/CEN note that, should this Bill be enacted, considerable responsibility for both Climate Adaptation and Climate Mitigation will be allocated to Local Authorities, including the responsibility for making a five-year Climate Action Plan within 18 months of its enactment. CPPN/CEN consider it necessary that the CDP 2022-2028 should refer to and make firm commitments to secure the necessary resources to meet these obligations which will very likely be in force before the adoption of this CDP.

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General Submission

Humanity faces an unprecedented global emergency in the form of the climate and biodiversity crises. Scientists have forecast that if global temperatures reach 2 degrees Celsius above pre-industrial levels, the consequences will be catastrophic, with higher temperatures making huge areas of the world uninhabitable; ecosystem collapse disrupting our food supplies; and sea level rises and more extreme weather events that will have unimaginable social and economic costs. In September 2020, [UN Secretary General António Guterres warned there is “no time to delay”](#) if the world is to slow the trend of the devastating impacts of climate breakdown.

Within Ireland, Clare is one of the counties at greatest risk from the effects of climate breakdown, including storms, flooding and sea level rise, as outlined by Prof John Sweeney in his address to Clare County Council in March 2020.

Ireland’s carbon emissions are [among the highest per capita in the EU, at an average of 13 tonnes per person](#), and our record in reducing emissions has been very poor. In 2005, the EU set Ireland a target to achieve an overall 20% cut in emissions by 2020. However, according to the Environmental Protection Agency, Ireland has achieved no more than a 1% overall cut during that 15-year period.

Meanwhile, a [major report on biodiversity and ecosystems published in May 2020](#) found the natural world is declining globally “at rates unprecedented in human history – and the rate of species extinctions is accelerating, with grave impacts on people around the world now likely”. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report warned that about one million species face extinction in the coming decades, and that “this loss is a direct result of human activity and constitutes a direct threat to human well-being”.

Clare County Council can and should take a proactive and ambitious approach to helping communities prepare for, adapt to and mitigate the effects of climate change and biodiversity loss. There is, of course, an environmental case to be made for this, but also there are undeniable and urgent social and economic reasons to put climate action front and centre of the new County Development Plan 2022-2028. We look forward to your consideration of our submission and hope that the wide-ranging expertise of the members and individuals who contributed to this submission is valued and respected by Clare County Council.

CPPN/CEN recommend that Clare Co Co use up-to-date, existing sources to conduct, commission or compile inventories or audits of the following in advance of preparing the CDP 2022-2028:

- Land use and ownership
- Forestry and tree audit
- Biodiversity audit including listing of vulnerable protected areas
- Water catchment and water bodies audit
- Air quality audit – and information on pollutants
- Energy efficiency audit of Co Clare’s private and public housing stock
- Energy efficiency audit of all industrial, commercial and publicly owned buildings in Clare.
- Soil type and quality audit
- Food security audit

Clare PPN/CEN would like to request on behalf of those consulted that the following general actions are taken as part of the CDP 2022-2028 process.

a) Clare Co Co, in line with national government, should declare and use the terms ‘**Climate and Biodiversity Emergencies**’. Our environmental member groups, Clare Environmental Network and the individuals who attended our consultation workshop are concerned that Clare Co Co policy documents do not adequately reflect the seriousness of the situation we are in. Clare PPN calls on Clare Co Co to declare a climate and biodiversity emergency and to use that wording in this County Development Plan.

b) Biodiversity – include in the CDP 2022-2028 a **definition of biodiversity** and ensure that where it is referenced a full understanding of the importance of biodiversity for human existence and sustaining life on earth is taken into consideration. We note that biodiversity is most frequently referred to in Clare Co Co documents as relating to tourism or amenity value or in connection with built heritage – this misrepresents the seriousness of the consequences of biodiversity loss and we would like to see this corrected in all documents and fed through to the actions of Clare Co Co.

c) Clare PPN calls for Clare Co Co to establish and fully staff a **Climate and Biodiversity Action Directorate**. This ‘Directorate’ will need to be resourced and staffed with people with the competencies to commission or carry out audits of land usage, marine area usage, biodiversity, soil, water & air quality, energy and emissions for the county and following these audits, consult widely and draw up plans for the usage, conservation and/or development of each in line with the forthcoming Climate Action Bill. Clare Co Co has correctly noted in previous responses to Clare PPN that Climate Change is a cross-cutting concern which is relevant to the work of each of its four existing directorates (Rural Development, Social Development, Economic Development, Physical Development). However, our members note that this approach means there is no directorate or staff team dedicated to climate action and the protection and restoration of biodiversity. CPPN/CEN have made a submission to the Joint Oireachtas Committee on Climate Action requesting that funding for the above be ring-fenced and provided to each Local Authority. Our members note that, at a minimum, four full-time staff would be needed to provide such a directorate in our Local Authority, with one being at a minimum of a Local Authority Grade 8 (Senior Executive Officer). CPPN/CEN further recommends that at least one full time person in these new directorates would be tasked with community engagement and with ensuring opportunities for effective and timely participation in environmental planning are promoted and supported.

d) Clare PPN requests that a **biodiversity officer** be appointed in a full-time permanent role to ensure that awareness of the importance of protecting biodiversity is mainstreamed and incorporated into all policies and actions and that they are available to provide training and research on the subject.

e) Clare PPN calls for the establishment of a **Climate Change and Biodiversity Strategic Policy Committee** which will work to help inform strategy and to advise on environmental sustainability issues in general as well as informing the creation of the Local Authority Climate Action Plan.

1. Vision Statement

Clare PPN proposes the following vision statement for the CDP 2022-2028. This proposal was gathered from the key concerns and hopes expressed by the following groups of PPN stakeholders: the Environmental College and Clare Environmental Network, Clare PPN Social Inclusion College, 156 individual respondents to Clare PPN’s Wellbeing Vision Survey, 34 representatives of member groups who participated in Clare PPN’s Municipal District Meetings, 21 member group representatives who gave views at Clare PPN’s County Plenary Meeting and the Clare PPN Secretariat.

‘The Vision for County Clare 2022-2028’

A county that values, protects and restores its unique landscape, environment and biodiversity, where sustainable livelihoods are prioritised for this and future generations and where citizens, migrants, ethnic minorities and people of all abilities, age groups and genders are able to reach their potential in an atmosphere of support, respect and inclusion, and where Local Government is open, transparent, accountable and committed to reducing poverty and marginalisation within the County; our vision is for a County to be part of and a County to be proud of.

2. Energy

A. CPPN/CEN note the reduced use of Moneypoint in 2019 and its contribution to reducing overall carbon emissions. CPPN/CEN note the following from the Southern Assembly RSES: “the conversion of Moneypoint electricity station by 2025 from burning fossil fuels as part of the transition to a low-carbon and climate-resilient society. The RSES recognises the importance of Moneypoint as producer of 25% of national energy and its potential as a deep water port.”

We call for CDP 2022-2028 to note this commitment to ending fossil fuel burning at Moneypoint and to commit to working with all resources available to Clare Co Co for a ‘just transition’ for those who work there. CPPN/CEN notes that, although a Taskforce was set up in the County to help oversee the transition, this Taskforce has not yet met (as of September 2020). CPPN/CEN note the efforts made by West Clare Municipal District Councillors to promote Sustainable Energy Communities and ask the Local Authority to lend its weight and resources to this and similar initiatives which seek to ensure that there will be sustainable employment opportunities for those affected by the closure.

B. CPPN/CEN request that the 2022-2028 CDP includes a statement saying there will be **no new** investment in fossil fuels or in fossil fuel infrastructure. They further request that Ireland’s commitment to banning fracking be repeated in this CDP but with an additional commitment that ‘no shale or fracked gas’ shall be imported and no planning permission will be granted in Clare to any projects seeking to import such gas. CPPN/CEN note that lapsed planning permission for the proposed Shannon LNG terminal was quashed in the High Court on November 10th, however we would like to see a commitment by the Local Authority made in the CDP that it will object to any future such planning applications for the Shannon Estuary. CPPN/CEN note that such a commitment would be in line with the current Programme for Government which has said the development of such terminals does not ‘make sense’ as Ireland moves towards carbon neutrality.

C. CPPN/CEN request that the CDP 2022 -2028 includes commitments to collaborate with industry, construction and education providers to develop apprenticeship schemes in the County which would aim at the 'green economy'. These could include apprenticeship programmes targeted at ensuring Clare has an available workforce skilled in retrofitting, solar panel installation, biomass energy production, wetland sewage systems and willow production. CPPN/CEN would like to see such apprenticeship schemes targeted at communities where there is underemployment.

D. CPPN/CEN recommends that the CDP 2022-2028 should include goals and a commitment to support community micro-generation of energy and to support and resource communities in skills needed to maintain community ownership and management of these energy projects.

E. CPPN/CEN recommend that CDP 2022-2028 detail a commitment to the use of substations and decentralised energy generation to avoid energy loss during or as a result of transport.

F. CPPN/CEN note that the Southern Regional Assembly RSES (RPO 160 future proofing and retrofitting) strongly supports the retrofitting or improvement in energy efficiency of all residential, public, industrial, and agricultural building stock. CPPN/CEN recommend that CDP 2022-2028 includes measurable targets for such work on the Local Authority's own buildings and a commitment to seek any available funding to make retrofitting of houses accessible to those at lower income levels. Grant schemes currently available are only relevant if a person has sufficient wealth or access to credit to avail of them in the first place. CPPN/CEN considers that as part of the Local Authority's ambitions to boost employment, to cut carbon emissions and improve air quality that a fully subsidised Local Authority-led scheme for retrofitting of houses could be viable.

G. CPPN/CEN note the considerable issues with the release of methane from agricultural practices in Ireland including in Clare and request that the CDP 2022-2028 include a commitment to research, support and pilot projects in anaerobic digestion in the short term as detailed in the Clare Renewable Energy Strategy 2017-2023.

H. These projects should be done with open, participative community consultation and on brownfield sites where environmental impact will be lowest.

I. Clare PPN/ CEN note considerable discontent amongst its membership at the manner in which Wind Energy projects are being rolled out in Clare, we request that the CDP 2022-2028 would require all such private operators or State-led projects in wind, offshore wind and wave, solar energy, anaerobic or biomass energy production to consult widely with communities and to demonstrate how they have done so and how they have addressed concerns effectively in advance of any permission being granted. CPPN/CEN note that the failure to undertake proper environmental planning has resulted in fines of €5 million to date at nearby Derrybrien in South Galway.

J. CPPN/CEN request that the CDP 2022-2028 would specifically address the proposals for data centres in Clare given that this is one of the LA's strategic objectives. CPPN/CEN requests that this CDP 2022-2028 commits to conducting a cost benefit analysis on whether or not seeking tenants to establish data centres in Clare is in fact the best use of land and resources for a sustainable future. We note that the possibility of the data centre/data centres functioning as 'economic drivers' and providing employment are the chief reasons put forward for pursuing this goal by the Local Authority. CPPN/CEN would like their capacity to fulfil these functions to be demonstrated in evidence before such projects go ahead. CPPN/CEN further note that data centres have an extremely high energy consumption footprint and as such will impact on Clare's Carbon Budget, and on the environment. CPPN/CEN would like there to be conditions attached to any such planning which would mandate that a data centre must generate its own electricity, be carbon neutral, and include in its plans a commitment to redistribute the heat resources generated for local use. Clare PPN notes that data centres are considered Strategic Infrastructure and so considers that it is of the utmost importance that the Local Authority clearly establishes the benefits of such projects and gains local support for them before proceeding as the opportunities for local engagement in the planning process are restricted.

K. CPPN/CEN consider that there is a necessity for more focus on educational initiatives around energy generation and usage in the county and would like to see commitments included in the CDP for information sharing events and roadshows on providing for the future energy needs of the county. CPPN/CEN note and commend Clare Co Co for its recent Local Authority Housing Information Events. We consider that there is huge opportunity and necessity for public engagement, information sharing, consultation and participatory decision making and that these approaches should become the bedrock on which ambitious plans for Clare are built.

L. Clare PPN/CEN note that there may be possibilities for energy generation from biomass, and solutions to issues with sewage treatment through the use of wetland willow sewage systems. CPPN/CEN would like to see studies of and pilot projects of such systems commissioned, trialled and reported on by the Local Authority. We seek a commitment to this in the CDP.

3. Air Pollution and Waste

A. As noted under 2. Energy, CDP 2022-2028 should include a commitment regarding Moneypoint to prioritise immediately a just transition for the workers, and should include a requirement for Moneypoint to immediately cease coal burning, should it not already have done so by the date of adoption of CDP 2022-2028.

B. CDP 2022-2028 should include a provision indicating that Clare Co Co will object or propose amendments to plans or existing infrastructure or industry in neighbouring areas where it is likely or possible that there will be a detrimental effect in Clare, e.g. Irish Cement/Aughinish Alumina.

C. As noted under 5. Travel, Transport, Housing, CPPN/CEN recommend the establishment of a Local Transport Taskforce.

D. Shannon Airport should be restricted to civilian flights only. War is a chief contributor to CO₂ emissions and in particular the US Military is the largest institutional consumer of oil in the world. CDP 2022-2028 should commit to sourcing other forms of funding for Shannon International Airport as a strategic transport asset in the region and should be cognisant of the fact that continued extensive military use of the airport impacts on Ireland's carbon emissions and our subsequent obligatory purchase of carbon credits at a cost to the taxpayer.

E. CDP 2022-2028 should introduce proper transparent measures to monitor air quality and report publicly on this on a six-monthly basis. For example, there are increasing reports from Clare residents of airborne red toxic waste dust blowing over the county from the Alumina plant at Aughinish. The waste is a significant health hazard when it is breathed in – or enters water supplies.

F. As noted under 1. Energy, CPPN/CEN Call on the Local Authority to ensure CDP 2022-2028 make a commitment to ambitious schemes to ensure retrofitting of public, industrial and residential buildings.

G. CDP 2022-2028 should seek to expand the existing 'bike to work' schemes to include electric bicycles and other transport technologies which would reduce the use of privately owned cars. Whilst this is a national programme, our group members saw opportunities for this to be piloted at a local level, particularly in line with plans for extensive greenways and cycle-ways in the County.

H. CPPN/CEN would like to see CDP 2022-2028 make significant commitments in terms of waste reduction and management. Some members noted that they would like to see the LA take waste services back into direct operation by Local Authorities. It should be noted that whilst this option was suggested by several people at our workshop, the opposing view was also put forward by one individual who wished to see the current system with private operators properly regulated and with suppliers tendering for complete 'routes' rather than the current situation of several companies collecting in one area.

I. CPPN/CEN recommends that the LA undertake a county wide programme of provision of well managed compost bins in public areas. This programme should include promotion and training in their use and management. Clare Co Co has the ability to lead the way in this regard and such a project would have a variety of benefits in minimising waste and methane emissions, in supplying organic fertiliser for council owned landscapes and in reducing the costs of waste disposal for householders. It would also provide employment opportunities in the training, management and sale of compost should it be rolled out successfully.

J. It is recommended that as part of a waste management programme under CDP 2022-2028 that a Clare-specific report on "how waste is currently being disposed of" by private operators and by the authority itself should be commissioned. This report will demonstrate whether opportunities exist to repurpose, recycle and minimise waste in County Clare and will establish whether Clare Co Co or other operators can create the conditions for this to happen.

K. CDP 2022-2028 should commit to the publication in January each year of a schedule of collections/ collection days for:

- Large household Items
- Paint/Chemicals/Hazardous/Waste
- Electrical Goods

The needs of communities living in poverty and without transport should be taken into account in such plans.

L. CPPN/CEN recommend that CDP 2022-2028 include a commitment to roll out 'Zero Waste Strategies' in the County and to seek buy in from State bodies, industry, farmers and retail outlets. As part of the commitment to Zero Waste, Clare Co Co could:

- Pilot an award scheme for Clare's first zero-waste community.
- Begin to pilot and implement 'Community Responsibility Plans' for refuse with communities being challenged and supported to produce zero waste.
- Commit Clare Co Co to the installation of public drinking water fountains/ bottle filling stations at convenient locations in all urban settlements and ensure that they are installed in all local authority buildings.
- Include a commitment by Clare Co Co to pilot compost toilets in national park, forest and other outdoor amenity settings and lead by example. Work to ensure that planning permission is available for use of compost toilets in suitable privately-owned premises or homes.
- Clare Co Co itself as part of zero waste could commit (post-Covid-19) to using no plastic bottles/disposable coffee cups or food implements at any Council-organised event or in its day-to-day work.

M. Clare PPN and CEN both noted that as well as the health promotional aspects associated with breastfeeding babies, that it is sustainable, reduces dairy consumption and minimises energy use. Both organisations consider that this should be noted and organisations who support women to breastfeed should be supported. To our knowledge La Leche League, which is hosted in Clare by Clare Women's Network, is the only organisation offering support to new mothers and we think initiatives to support those who choose to breastfeed should be mainstreamed and promoted by Clare Co Co. Clare PPN/CEN recognise that breastfeeding is not possible or not the choice for some mothers and this should be respected. We suggest that Clare Co Co should declare itself and all of its offices to be breastfeeding friendly zones in its CDP 2022-2028 and lead by example.

4. Community Resilience, Health and Wellbeing, Awareness Raising and Education

A. CPPN/CEN note that CDP 2022-2028 should commit Clare Co Co to establish Community Emergency plans for each settlement area in the county. Following the Covid-19 response, CPPN/CEN suggest that the LA should lead on drawing up such plans. These plans would include named volunteers in each area who have agreed to take responsibility for certain aspects of the situation and should include the provision of local access to emergency, food, water and medical supplies, local access to shelter in a community or council owned building in the event that front line services are unable to reach people. CDP 2022-2028 should include a commitment to plan, resource and train people for this purpose immediately, particularly in areas deemed to be at severe risk of flooding or other isolating events which may prevent access. It is envisaged that these actions should make use of existing community groups and structures and text alert schemes/WhatsApp groups. The establishment of these groups and structures would provide an opportunity for training in emergency responses, first aid and sustainable practices to be rolled out simultaneously, and CPPN/CEN consider this a valuable opportunity which should be taken up by the local authority. CPPN/CEN also call for CDP 2022-2028 to include an action, with the consent of those involved, to identify community members who may be more vulnerable to such situations including Traveller community members in temporary dwellings, holiday makers in mobile homes, elderly or isolated communities and people with disabilities, and – with their permission – to organise the addition of their names, addresses and contact numbers to locally held emergency response plans. These lists should be updated regularly and can be restricted for emergency use only.

B. CEN/Clare PPN note that one of the impacts of the Climate and Biodiversity Emergency is an increase in migration. It is extremely likely that internal displacement will be a feature of the Climate and Biodiversity Emergency within County Clare and CDP 2022-2028 should include provisions to predict, monitor and plan for this. Secondly, the Climate and Biodiversity Emergency has already increased migration from inhospitable parts of our planet: CDP 2022-2028 should include provisions for the speedy integration and support for migrants into County Clare. Currently there are approximately 400 international protection applicants in Clare in either Direct Provision Centres or emergency accommodation. It is in the interests of their human rights, as well as to the benefit of the whole community and its resilience and cohesion that these methods of accommodating migrants are changed and people are not placed in institutional settings where they are excluded from proper integration with the community and the community does not have the benefits of their skills and capacity. CPPN/CEN note firstly that the current Programme for Government includes a commitment to end the practice of Direct Provision accommodation for international protection applicants and secondly that the recently published Government commissioned Advisory Group ‘Catherine

Day' Report on Ending Direct Provision recommends a transfer of responsibility for accommodating International Protection Applicants to Local Authorities by 2023. This CDP should take account of this in its resource planning.

C. CDP 2022-2028 should include commitments and actions to support communities with regard to rainwater harvesting and micro energy generation with a view to increasing community resilience.

D. CDP 2022-2028 should include an explicit recognition that young people are at the heart of campaigning for sustainable lifestyles and action on the Climate and Biodiversity Emergency and a commitment to ensure that it establishes systems whereby their views, expertise and leadership are taken into account in all actions. Clare PPN suggests that any new Climate and Biodiversity Emergency and Biodiversity Committee should have a portion of its seats ring-fenced for secondary-school-aged young people or that it be required to set up processes to consult with them directly. This could be a pilot project and it would help combat cynicism and put young people at the heart of decision-making.

E. Clare PPN and CEN wish to see commitments in CDP 2022-2028 that climate breakdown becomes a mainstream issue and would like to see Clare Co Co's media personnel, its environmental officer and its heritage officer supported fully in publicising these issues through local media, www.clarecoco.ie and social media.

F. Clare PPN and CEN recommend that CDP 2022-2028 includes a commitment to establishing a climate award scheme as part of its awareness raising toolkit, where groups who have innovated or demonstrated exceptional sustainable practice can be nominated for an award and so creating publicity for the practices as well as encouragement for groups.

5. Water Quality, Management, Flooding and Marine

A. CDP 2022-2028 should include provisions for local authority and community input in the strategic and environmentally sustainable management of water resources in the County.

B. CPPN/CEN note the responsibility of Irish Water for some of the below actions, however the protection of water sources in County Clare is of strategic importance for the sustainable development of County Clare and is crucial on a number of levels, from access to clean drinking water to the protection of natural habitats and biodiversity, as well as amenity value and in the prevention of disease. CPPN/CEN would like to see CDP 2022-2028 include explicit commitments to protect, restore and improve all inland and coastal waters, groundwaters and associated wetlands and to prevent any further deterioration as a result of any activities or developments undertaken or permitted by Clare Co Co (as per EU Water Framework Directive).

C. CPPN/CEN commend the work of the Local Authority Water Community Officers and note that these officers have both a large remit and large territories to cover. We suggest that their work would be hugely supported by the establishment of a Climate and Biodiversity Action Directorate in each Local Authority Area with whom they could work closely.

D. CPPN/CEN call on Clare Co Co to commence monitoring all raw water sources in Clare, including those used to supply privately run Group Water Schemes. CPPN/CEN draw attention to the strategic importance of these schemes which, as well as supplying private residences, also supply vital local businesses. CPPN/CEN note that there is both a public health and an environmental interest in monitoring water source quality in Clare and that a properly resourced Local Authority is better positioned to carry out such monitoring regularly and to a consistent standard than are diverse voluntary committees and boards of management.

E. At our consultation, a strong preference was expressed that the proposed diversion of the River Shannon be prevented. They drew attention to the levels of leakage within our national water network and recommended that these be addressed before any scheme such as the Shannon diversion be progressed. It was also noted that water security will be threatened due to incidences of flooding, groundwater pollution and drought and considered plans to divert the Shannon as risky under those circumstances as it serves a large catchment area.

F. CPPN/CEN call on Clare Co Co to take the lead in ensuring that attention and resources are directed towards ending all releases of untreated sewage/wastewater into water bodies in Clare. A report from the Environmental Protection Agency on 12th November 2020 revealed that planned works to upgrade wastewater infrastructure have been delayed in five Clare towns and villages where raw sewage is released into the environment each day. CPPN/CEN recommend that a timeline is put in place with Irish Water for such works to be carried out and that Councillors, community groups and the general public are informed of this timeline and kept up to date on all developments, progress and delays.

G. CPPN/CEN requests that the same inter-agency/community approach detailed above is taken, with Clare Co Co leading initiatives to ensure that areas which are suffering poor drinking water quality and interruptions to service are prioritised by Irish Water and that a timeline for any works required is put in place and regular updates on developments, progress and any delays are provided to all stakeholders.

H. CPPN/CEN were asked to note that several participants in our consultation workshops noted that expensive protection projects for the Shannon banks may not be good use of resources and that the preferred course of action might be to plan for the expected flooding of land and to allow it to happen, having established a compensation and preparation plan for those affected. Clare PPN/CEN recommend that a cost benefit analysis of such approaches is carried out with and for the communities in Clare likely to be affected. CPPN/CEN wish to see an action included on the effects of invasive species on our water resources and wildlife and suggest that an action to monitor and assess this be included in CDP 2022-2028.

I. CEN/Clare PPN request that CDP 2022-2028 includes actions designed to restore bogs, peatlands and wetlands to their natural functions – flood water storage. This in particular should be taken into account when planning for renewable energy infrastructure and forestry. What may appear to be ‘non-productive land’ may be providing a vital function.

J. CEN/Clare PPN suggests that a river bank management plan is drafted for the county. This should include an analysis of the current ownership and condition of river banks, a detailing of areas prone to flooding as well as an inventory of actions to prevent or plan for flooding – such as the planting of native tree or bush cover etc. CEN/Clare PPN would like to see actions to increase farmland buffer strips alongside rivers and contour lines for tree planting in all long-term land use strategies. These may also provide green infrastructure for wellbeing and leisure use, including cycle-ways and greenways and blueways.

K. In respect of housing, CPPN/CEN recommend that CDP 2022-2028 includes an action for the planning department to require plans for houses to include green spaces that will absorb rainfall and that the use of patios and paved areas is minimised, except where necessary for safety and access.

L. As detailed under heading 7. Biodiversity, Land Use, Soil Health, Food Security & Production, CPPN/CEN request that a total ban on glyphosate/pesticides is enacted across the county, with any continued usage being subject to emergency licences. A collection and disposal scheme for glyphosate and pesticides should be commenced alongside this.

M. As submitted under heading 2. Air Pollution and Waste, CDP 2022-2028 should, in the interest of water quality and marine life, support any moves to ban single-use plastic, with exceptions made which will ensure the continued availability of items such as plastic straws for disabled people who may require these as necessities rather than as options. CDP 2022-2028 should indicate that Clare Co Co intends to implement and enforce any national legislation to this end.

N. CDP 2022-2028 should, as suggested under 3. Air Pollution and Waste, include a commitment to researching and piloting sustainable drainage systems with a view to their wider use in the County.

O. CDP 2022-2028 should include notice that Clare Co Co intends to enforce existing regulations regarding the spreading of slurry. As noted under 2. Energy, CPPN/CEN call for CDP 2022-2028 to include commitments to enabling the research and piloting of anaerobic digestion systems on brownfield sites with community consent.

P. CDP 2022-2028 should include a commitment to work closely with organisations such as Teagasc in order to ensure that training and support for changed practices in farming are available. Clare PPN also notes the existence of the organisation Talamh Beo which may be available to provide training or public seminars in respect of food sovereignty and sustainable food producing practices.

6. Travel, Transport and Housing

A. The CDP 2022-2028 should include commitments to set up a task force on public transport in the county with the aim of ensuring all existing services work together in coordinated schedules and include more and more regular stops between key regional points such as Shannon Airport, Galway and Limerick, and that public transport, cycling and walking become viable options for the majority of the population in the county. This task force should be established in the short term and have community representation as well as representation from transport authorities and local providers. Clare PPN and our member groups feel very strongly that Clare Bus can be part of this strategy and that their experience in tailoring services to local needs should be availed of.

B. CPPN/CEN note the prioritising of the Northern Distributor Road in the RSES. A portion of our members have noted that from an environmental perspective this project does not reflect good future-proofed planning as it will serve to increase car dependency and act against the principles of compact urban growth. CPPN/CEN further note that the development of an urban rail system in Limerick with stops at Moyross and potentially at UL has been discussed in the context of the Limerick Shannon Metropolitan Area Transport Strategy and that, combined with further stops in Clare and a direct connection to a new rail spur to Shannon, this would be a preferable option.

C. CPPN/CEN call on Clare Co Co to advocate strongly and make provisions within CDP 2022-2028 for the construction of a rail spur to Shannon Town and Airport/Industrial Estate from the Galway-Limerick Line. This would be a crucial piece of infrastructure and would assist with the development of the region, the desirability of Shannon as a place to work, live and commute to. CPPN/CEN note that funding for a new study into this proposal was announced on November 10th 2020 by Minister for Transport Eamon Ryan, along with a support package of €31 million for Shannon and Cork International Airport.

D. CPPN/CEN suggest that CDP 2022-2028 or a Clare County Transport Plan to be overseen by the Transport Taskforce should set annual targets to increase passenger load per vehicle and to decrease the total number of vehicles on the road with a combination of electric vehicles, autonomous vehicles, public transport and car sharing. They recommend that community car schemes such as Go Car are trialled in urban areas of Clare.

E. While CPPN/CEN recognise that efficient, effective public transport and compact growth should be prioritised due to their benefits for carbon emissions, air quality and lifestyle, we also call on Clare Co Co to make extensive provision for electric car and public transport vehicle charging stations on the existing road networks in the county as part of its CDP 2022-2028.

F. CDP 2022-2028 should commit to advocating that all new public transport offerings should be provided using zero or low emission vehicles with universal accessibility for those with disabilities.

G. School bus services should be expanded and subsidised to ensure that they become the dominant form of motorised transport to and from schools.

H. CDP 2022-2028 should include measures to pedestrianise town centres with exceptions being made for public transport vehicles which minimise the use of private cars. CPPN/CEN note that all pedestrianisation projects should be done in consultation with disabled people and those with reduced mobility to ensure access for these groups of people is preserved and, where possible, enhanced. CPPN/CEN note that electric low-powered 'micro cars' are used safely in cycle lanes in many European cities and that these should be an option for transport within urban areas for people with reduced mobility.

I. Several attendees of our workshop requested that CDP 2022-2028 should include an action and a timeline to begin a process of upgrading or providing footpaths on all roads with provision both for walking and for people with disabilities to access them.

J. CDP 2022-2028 should include commitments to establish park and ride facilities in commuter settlements in Clare with links to public transport.

K. CDP 2022-2028 should plan for Clare Co Co's provision of infrastructure for recycling of Electric Vehicle batteries and the development of a regulated market for their end of life when they can be repurposed for other uses such as in conjunction with wind energy. Should this require a national legislative basis, Clare Co Co should seek a commitment to this from national government.

L. CDP 2022-2028 should ensure that actions regarding the provisions of specific bicycle/walking/horse transport lanes, separate from roads, are included in any long-term transport strategy. It is not necessary nor always preferable for alternative forms of transport to follow the same routes as those developed for motor vehicles.

M. CDP 2022-2028 should include commitments to plan for, promote and support safe cycling in the county, including by resourcing and supporting bicycle rejuvenation and loan schemes.

N. CDP 2022-2028 should include commitments to further develop tourism-related shuttle services in an extended group of villages and on a variety of routes with a view to ensuring that coach tours eventually use these services too. This is already in action at Bru Na Boinne and serves to protect the monuments and their surroundings from tour buses and noise pollution. In Clare it would provide a boost to local villages to have these services departing and returning from them rather than a tourist centre or hub.

O. CDP 2022-2028 should include measures to promote local and micro food production – including mandating green areas for drainage and possible food production in house plans, encouraging and supporting community gardens in public spaces and including provision for them in all new housing estate applications.

P. In respect to housing, Clare PPN/CEN request that CDP 2022-2028 commits to updating its planning processes to ensure that all new buildings are required to include provisions for ensuring water harvesting and grey water systems in housing plans. As noted under 2. Energy, we call on Clare Co Co to promote and extend the opportunities available for retro-fitting houses for energy efficiency. Clare PPN notes that there are further opportunities in this field for the establishment of apprenticeships in the area of retrofitting and solar panel fitting to create sustainable work and livelihoods for people in Clare and recommend that these opportunities are investigated with an opportunity for LCETB, LIT, LEO etc to lead in training and skills in such areas.

Q. CPPN/CEN recommend that CDP 2022-2028 should include clean air targets and support measures to reduce and then cease the use of fossil/carbon-emitting fuels in urban housing estates and individual houses, while protecting residents from fuel poverty.

7. Biodiversity, Land Use, Soil Health, Food Security & Production

A. As noted in the introduction to this submission, CPPN/CEN consider that a Biodiversity Audit and a Land Use Audit, both of which can either be compiled from existing up to date sources or, if such sources are not available, can be commissioned by Clare Co Co are essential precursors to the drafting of CDP 2022-2028.

B. As previously noted, CPPN/CEN would like Clare Co Co to adopt a definition of biodiversity to ensure that, where it is referenced, a full understanding of the importance of biodiversity for human existence and sustaining life on earth is taken into consideration.

C. CDP 2022-2028 should commit to recognising Seedsavers as a significant national resource for biodiversity and should make a commitment to supporting the organisation and assuring that it has sufficient funding to operate sustainably, independently and without fear for its future. Seedsavers should be viewed as a national resource and biodiversity asset as well as part of our natural heritage.

D. The organisation CELT (Centre for Environmental Living and Training) should be supported in its environmental training initiatives, both through funding and through use of the organisation by Clare Co Co itself, especially training in sustainable woodlands and agroforestry.

E. Glyphosates and other non-organic sprays/pesticides/herbicides should be prohibited and replaced with sustainable methods and an awareness-raising programme. CDP 2022-2028 should plan for this development.

F. CPPN/CEN see considerable opportunity for Clare to embark on a process to become an 'Organic County' and consider that CDP 2022-2028 could include commitments to making this a reality. CPPN/CEN note that such a strategy can provide environmental, health, tourism, lifestyle and economic benefits for the County. Clare Co Co could make its own commitments in this regard to the land under its stewardship. As noted above, it could begin by banning non-organic chemical usage, except with licence for invasive species and as noted under 3. Air Pollution and Waste, there are opportunities for a county-wide roll out of composting stations in public places.

G. CDP 2022-2028 could also include commitments to reinvigorate the reputation of County Clare as a 'Slow Food' production region. This would help to promote sustainable farming methods, lifestyles and attract high value tourism to the region. Community and private enterprises such as Moy Farm, Seedsavers, Wild Foods, Jim Cronin's Organic Farm and various restaurants, cafes and farmers markets are already engaged in this effort and so committing in CDP 2022-2028 to supporting them through promotion and opportunity would deliver a tangible benefit for all.

H. CDP 2022-2028 should indicate that Clare Co Co is committed to reducing sewage and slurry pollution, with particular attention to that which may include antibiotics, chemicals and pharmaceuticals. Please note previous recommendations with regard to researching and piloting anaerobic digestion on brownfield sites with community consent as a means of generating energy and of reducing slurry spreading.

I. CPPN/CEN understand that agricultural policy is not part of the remit of Clare Co Co, however its responsibility for planning land use and introducing bye-laws mean that Clare Co Co can have significant impacts on practices in the County. CPPN/CEN recommend that CDP 2022-2028 should outline a strategy to incentivise farmers and landowners in Clare with regard to allowing wildflowers and weeds to grow and to know the benefits of doing so. As noted elsewhere, this can be part of complementary green economy projects which may assist farmers in securing a diversified and environmentally sustainable livelihood.

J. CDP 2022-2028 should support and prioritise regenerative agriculture.

K. CDP 2022-2028 should commit to encouraging diversification of farming towards sustainable practices which can assist farmers and rural communities in achieving good livelihoods in Clare – supports, training, and grant-aiding sustainable agriculture start-ups or change of use will be necessary.

L. CDP 2022-2028 should include a commitment to education, incentive and finally sanctions regarding plastic waste, including the pollution of trees/hedgerows by farmer plastics such as silage wrapping.

M. CDP 2022-2028 should consider food security from the following perspectives – (i) local access to food in emergency situations and (ii) ensuring that diverse, local, sustainably farmed food becomes a key aim of policy in the area of farming and land use, with less invasive and intensive models being piloted to allow for maximum recovery of soil. Our attendees considered that CDP 2022-2028 should include commitments to working towards food independence and that an evaluation of the nutrition requirements of the current and projected population and the food production capacity of the county would be the most useful starting point for such initiatives.

N. CPPN/CEN consider that CDP 2022-2028 should include commitments to raise awareness and provide education in the County regarding regenerative forms of agriculture such as agro forestry, and holistic livestock management (zero carbon beef) and investigate actions such as the establishment of a mobile abattoir for Clare which could visit farms, to reduce travel and trauma and stress hormones in the meat and to ensure meat is available for local consumption. This might also help farmers by providing another option in respect to the monopoly held by the meat factories on beef prices.

O. In the above regard CDP 2022-2028 should include clear commitments that Clare Co Co will engage constructively in consultations with farmers and their organisations including Talamh Beo, the IFA, Macra and the new Beef Plan Movement regarding the need for changes to farming practices around beef production, dairy production, hedgerow and habitat protection, waste disposal and pesticide use. CPPN/CEN recognise that the farming community will be vital in ensuring that Ireland and Clare are resilient to Climate and Biodiversity Emergency and recommend that processes are established to ensure that respectful communication can happen.

P. While promoting silviculture and agroforestry, CDP 2022-2028 should include actions to reduce and remove incentives in Clare for Sitka or mono-crop, non-native evergreen species forestry plantations. CPPN/CEN recommend that CDP 2022-2028 should steer any forestry policy in the county away from dependence on monocultures such as Sitka Spruce and promote the growth of native, mixed woodland wherever possible. It should recognise the value of bog, wetland and 'marginal' or poor quality farming land being important as carbon stores and habitats for biodiversity.

Q. Clare Co Co should include in CDP 2022-2028 a commitment to make provisions in its land use planning and in all developments for wildlife corridors and hedgerows.

R. CDP 2022-2028 should include a commitment to use qualified tree surgeons to prune or manage trees on public land. This is another area which might be suitable for apprenticeships and sustainable job creation opportunities. A commitment to organise and run training programmes in hedgerow management should also be included.

S. CDP 2022-2028 should include commitments that the timing of hedgerow cutting will be scheduled by the local authority to have the lowest impact on nesting and biodiversity.

T. CDP 2022-2028 should seek to prohibit clear felling in forestry and to promote continuous cover forestry.

U. CDP 2022-2028 should include actions aimed at investigating the possibility for diversification within the forestry and wood product industry in a sustainable fashion.

V. CPPN/CEN call on Clare Co Co to commit to compensating for any loss of biodiversity caused by development activities by planting more native trees or 'rewilding' available council land – or any available land.

W. CDP 2022-2028 should commit to introducing byelaws banning ecocide in Clare. Ecocide is the deliberate destruction of the natural environment. The provision should include the activities of the local authority as well as community and business interests in Clare.

X. CDP 2022-2028 should include a commitment to respect and implement soil protection and regeneration measures in all its planned developments and to encourage and support such measures in the wider community.

Y. CDP 2022-2028 should include a commitment for Clare Co Co not to approve plans that include risks of soil damage or contamination.

Z. CDP 2022-2028 should include a commitment to ensure that all publicly used locations in the county have segregated waste bins available and managed by Clare Co Co.

AA. CDP 2022-2028 should include commitments to diversify and build on the success of the Wild Atlantic Way in a sustainable way. Some of the suggestions regarding greenways have been mentioned before in relation to public transport and encouraging cycling, however, it bears repeating that an extensive greenway route in Clare would be an investment in the future and in sustainable tourism and transport. CEN and Clare PPN consider there are opportunities for constructing such greenways so that they and their surrounds act as hedgerows, as wildlife and pollinator corridors and as a source of diversified income to farmers and landowners. While the preference of our attendees was for public ownership of such green infrastructure, it was also considered that the option of renting 'corridors' of farmers' land should not be ruled out as it may make the project more sustainable and attractive to farmers. The Burren Way currently compensates farmers for allowing passage through their lands and this model should be investigated.

BB. Clare PPN CEN consider that CDP 2022-2028 should include a commitment to develop a sustainability, conservation and expansion plan (through strategic non-compulsory land purchase) for the Burren National Park. While this plan should include traffic management, a traffic management plan is not sufficient to protect the heritage, landscape, and biodiversity habitat that exists there. The park itself should be protected from development.

CC. As noted under various headings, CPPN/CEN recommend that commitments are made in CDP 2022-2028 to research and pilot viable options for extending use of anaerobic digestion, biomass fuels, for the extension of willow-based waste treatment, for bio-char production and any other such potentially sustainable enterprises which might assist Clare in its adaptation to the Climate and Biodiversity Emergency. It is also noted that such localised projects may be suitable for apprenticeships and rural social schemes and social enterprises. CPPN/CEN note the success of Social Farming as a model to include marginalised people in farming and community life and suggests that opportunities in the green economy be considered from a social and wellbeing perspective as well as for their environmental and economic prospects.

8. Work & Economy

CPPN/CEN have made suggestions at various points in this submission for the creation of employment opportunities within the 'Green Economy'. We wish to draw attention to the impact of the Covid-19 pandemic on work practices in the county; CPPN/CEN note and commend the provision of digital hubs and the proposal to increase the number of these over the coming years. CPPN/CEN also note that Clare Co Co has successfully managed to allow home working amongst its staff as well as holding virtual meetings. CPPN/CEN would like to see the CDP include a commitment from the Local Authority that it will encourage staff who can and wish to work remotely to do so. This will assist with emissions from commuting and in establishing a decentralised workforce, as well as with rural development and the dispersal of economic activity in the county. CPPN/CEN note the significance of the availability of high speed broadband to ensure that the option of remote, home or decentralised work practices remain viable. CPPN/CEN consider that a commitment to ensuring quality access to in-home broadband be a priority in the CDP 2022-2028.

Clare PPN/CEN welcome this opportunity to make submissions in respect of the CDP 2022-2028 and we trust that the views of our member groups and participating individuals will be given careful consideration. We welcome any queries about any aspect of this submission. We wish to state in conclusion our commitment to working collaboratively to maintain and improve the sustainability of our communities in a manner that seeks to include and consider every member of the population in Clare and the future generations to come. _____

Any queries in relation to this submission can be directed to Sarah Clancy, Clare PPN Coordinator, for the attention of the Secretariat of Clare PPN.

