

Submission no: 163

Development Plan Review.

Planning Department.

Clare County Council.

New Road.

Ennis.

Co. Clare. V95 DXP2



16<sup>th</sup> November 2020

Re: Clare County Council Development Plan 2022 – 2028

Dear Sir,

I am pleased to have the opportunity to contribute to the discussion of the future of County Clare. This beautiful county has been my home for the last 18 years and I really cherish it. My comments below on the forward plan for the county will contain a blend of strategic thoughts and suggestions for practical implementations.

It is becoming very evident that our health, wellbeing, wealth and future prosperity, and probable long-term survival, are dependent on our ability to look after our environment, its resilience, biodiversity and our capacity to live within the planetary boundaries. It is essential that any plan and actions we take have the effect of addressing the climate and biodiversity emergencies that our planet faces. Reading the council's flip book for the development plan I felt that the magnitude of these emergencies was not adequately reflected in the language or the ambition of the ideas presented. 'Business as usual' is not an option, in fact it is a very, very long way off what we need to do to put ourselves in a position to survive and thrive in this county into the future. Our actions here do have effects globally, so we must 'think global, act local'.

Whilst it is acknowledged that the Council have put sustainable development as a responsibility on all its Directorates, I do worry that this dilutes the responsibility, and drive, to truly embed sustainability into the Council's work. I believe it is essential that the Council has a Directorate with a Senior Executive Scientist / Officer who has the responsibility, accountability and resources to promote, support, monitor and report on the progress of the Council and County in its journey to excellence in sustainable living and environmental protection.

Thinking about monitoring and reporting, I really believe we need measures reported which are not solely focussed on the economic development of the county, but also monitor our progress towards a sustainable, environmentally protective, socially and culturally inclusive place to live, work and thrive. Such metrics would also help our planners in strengthening the resolve to take the wider context of environmental and social good as a priority when determining planning decisions, as the value of such decisions could be evaluated in the round, not just on development / economic grounds.

In relation to housing, it will become increasingly vital to ensure that the housing stock is built or retrofitted for energy efficiency and low carbon living;

- Housing development must be integrated with an expanded public transport network, schools, services such as post-office;

- Good provision of social and green space for community wellbeing and engagement for all ages, especially adolescent and seniors.
- Developments should look to incorporate renewable energy micro-grids or district heating schemes and increase the provision of fast charging for electric vehicles.
- Provision of fast reliable broadband and internet connection.

The way in which so many of us now work in the COVID-19 environment, from home and utilising broad band services and internet connection, does open a window on how the working environment may look for many in the future. However, there will always be the need to travel for so many reasons; it is imperative that our transport network evolves rapidly into a much more sustainable and low-carbon system. A key goal must be to dramatically reduce the number and impact of fossil-fuelled vehicles on the county's roads. Many strands contribute to this goal, some ideas;

- increasing the number, connectivity and safety of cycleways both on and off-road throughout the county, especially on rural roads where public transport is currently limited if even available;
- extending the public transport network into more rural villages and utilising smaller electric vehicles;
- providing park-and-ride facilities at outskirts of the larger urban/municipal areas and key industrial estates.

All development on floodplains must be stopped and real effort is put into reclaiming flood plains and wetlands for its natural function of flood water storage, as this contributes significantly to flood protection. Adequate sewerage provision is essential for any housing / urban development. Whilst sewerage is a responsibility of Irish Water, the Council must have good dialog with Irish Water to ensure that the infrastructure is properly designed, installed and integrated with the existing systems, and has adequate capacity for growth over the long term. One of the greatest strains on the sewerage network is surface water run-off during rainfall events getting into the system. The Council have responsibility for so much paved area (roads, pavements, carparks and the like) and, importantly, the adjacent soft ground of verges, hedgerows, banks and so on. These soft ground areas can, and should, be managed as water catchment and retention areas slowing the flow of run-off both into the rivers and, unintentionally, into the sewerage system.

I do worry to see so much hard flood protection being constructed, both on our rivers and on the coast. There may be areas where this is essential, however, it inevitably leads to problems elsewhere, either in terms of changing the shape of flood waves in our river systems and exacerbating flooding downstream, or by enhancing erosion of natural 'soft' landscape features which provide habitats and often natural flood protection. I really want to see the Council re-evaluating its currently quite traditional hard engineering approach to flood protection and looking to other soft engineering options.

Hard engineering infrastructure projects do require environmental impact assessments, and these should not be a weak concession to environmental protection, but the backbone and minimum basis of the environmental protection measures required. Where expert advice on environmental or heritage matters is presented it is of equal weight to the economic matters, if not a greater influence as a healthy, sustainably diverse environment is required and underpins all other development.

We are currently in a global biodiversity crisis and our beautiful county is not immune from the actions which are driving it. Strategies and actions to address the biodiversity emergency have to be taken now, at all scales and the Council has a huge role in how it manages the land it is responsible for and how it promotes and leads town, business, school and individual actions.

- It is essential that *all* council owned, or managed land is managed with biodiversity and environmental protection first and foremost in mind.
- The elimination of pesticide spraying, with the exception for invasive species such as Japanese knotweed or giant hogweed, is essential;
- promoting planting for pollinators, native tree species planting, meadow mowing regimes and the like are all significantly undermined and devalued by the continued use of severe pesticides from an environmental perspective. Many pesticides also raise public health concerns and the levels of some hazardous chemicals and pesticides are showing worrying trends in the EPA monitoring data around the country; not a trend County Clare should join in with.

Agriculture is a very substantial part of the landscape and economy of County Clare, it should be protected and supported to become a viable, indeed thriving, livelihood. Our farmers should be supported to become stewards of the environment, rather than being put into the position of needing to over-exploit their land to make ends meet. As our knowledge and understanding of the environmental impacts of agriculture, particularly intensive agriculture, become apparent it is imperative that the agricultural industry is supported by local infrastructure, services and regulations to significantly reduce those impacts whilst maintaining and improving farm livelihoods. ([https://ec.europa.eu/food/farm2fork\\_en](https://ec.europa.eu/food/farm2fork_en)). The water quality impacts of agriculture are really putting Ireland's compliance with several EU Directives at substantial risk and we must change direction;

- Slurry spreading is a useful addition of organic matter to agricultural land, however too much, and / or the wrong time, or in an inefficient way increases environmental problems for water quality and greenhouse gas emissions. Council support and encouragement for the provision of anaerobic digestors for clusters of farms with surplus slurry could generate an environmentally safe route for excess slurry disposal, a source of biogas for renewable energy / input into the gas network and hence a source of additional farm income. ([http://www.cre.ie/web/wp-content/uploads/2018/03/Guidelines-for-Anaerobic-Digestion-in-Ireland\\_Final.pdf](http://www.cre.ie/web/wp-content/uploads/2018/03/Guidelines-for-Anaerobic-Digestion-in-Ireland_Final.pdf)).
- Restricting livestock access to rivers is also required to help improve the water quality.
- As mentioned previously the drainage and improvement of wetlands is not helping our natural catchment flood control and retention; guidance and enforcement for maintaining these essential areas is really needed.
- The huge improvement in farm plastics recover and recycling is to be applauded, and it must be maintained and expanded. Plastic contamination of our soils has been recognised as an important, long lasting and intractable issue; avoidance is imperative. (<https://ieep.eu/uploads/articles/attachments/3a12ecc3-7d09-4e41-b67c-b8350b5ae619/Plastic%20pollution%20in%20soil.pdf?v=63695425214>)
- The EPA water quality report or 2013 to 2018 highlights serious issues with nutrients (nitrate and phosphate) and hazardous substances, such as pesticides in many rivers around Ireland, and County Clare is included in these deteriorating trends. Cessation of pesticide and herbicide use, except for licenced control of invasive species, is essential to protect the health and quality of our food, our wildlife and our environment and its diversity. (<https://www.epa.ie/pubs/reports/water/waterqua/waterqualityinireland2013-2018.html>)
- Promotion of regenerative agriculture and organic agriculture within County Clare would help recognise and increase the value of the farm products. Supporting local farmers markets, local farm co-operatives and the slow-food movement within County Clare are all positive mechanisms to increase the value directly to the farm and improve their livelihoods as well as the quality of the environment and life within the county.

Waste management is becoming an increasing pressure on our land and resources. One emerging direction that I would like the County Council to pursue as an opportunity for environmental improvement and job creation is that of circular economy innovation. The potential for repair and upcycling cafes or centres across the county is there as the Rediscovery Centre at Ballymun shows. <http://www.rediscoverycentre.ie/about-us/> I believe there are wider opportunities in this area and innovative business and education ideas should be supported and promoted by the Council.

Litter, including marine litter on the county's beaches, is an ongoing area of concern, particularly with the amount of plastic being discarded. The widespread provision of waste recycling facilities is essential as is public awareness and education campaigns as to the environmental impacts and actions that individuals can take. Where community groups do undertake environmental clean-up activities, such as beach clean-ups the council must provide facilities to assist with the removal and disposal of the collected debris.

What makes County Clare a great place to live and to visit is that it is wonderfully endowed with many beautiful landscapes and habitats. Consequently, it is essential that significant and ongoing efforts are made to really protect, conserve and maintain our natural habitats;

- Habitat protection must be a priority especially wetlands, woodland, hedges, coastal dunes and marsh land. The planning function has a key role here in the sensitive forward-thinking protection of these areas, as do the operational functions of the County Council; just as an example whilst hedge trimming is essential for road safety, the timing and how it is undertaken can have a huge detrimental effect on the hedgerow ecosystem, its' wildlife (particularly nesting birds), diversity, the propagation of invasive species and the visual / amenity impact of the hedgerow and the mature trees within it. Removing potentially dangerous branches from mature hedgerow trees should be done by trained tree-surgeons with safety and the long term environmental function and amenity of the trees in mind.
- Irish Seed Savers based in Scariff is a nationally treasure which we, as a county, are lucky and proud to host, and it is an organisation whose work will only become more vital as time progresses and so requires more support and promotion to maintain it.
- Forestry development must only be permitted with a full evaluation and protection measures implemented for the biodiversity, water quality and social impacts.
- The current preference for larger areas of non-native softwoods monocultures should be reversed and promotion of forestry areas as a much more mixed crop, including native wood land, small stands of commercial softwoods blended with public access and activities such as hiking, mountain biking and activity trails, (Delamere forest in Cheshire UK is an example of diversification of such forestry economic activity, <https://www.forestryengland.uk/delamere-forest>).

Tourism is a keystone industry for County Clare, and one that depends heavily on our fabulous natural environment and landscapes as well as good infrastructure and transport links. Besides protection of those landscapes and habitats providing sensitive access to them to educate and encourage visitors is needed. A few implementation suggestions:

- promote a sailing / marina trail along the coast as a marine parallel to the Wild Atlantic Way, (an example would be the west of Scotland whiskey trail <https://www.visitscotland.com/see-do/active/sailing/west-coast-itinerary/>);
- improving the number and condition off-road cycle ways and walking trails with safe, secure and non-obstructive parking at trail heads.

- For cultural activities structured outdoor spaces such as an amphitheatre (with good access infrastructure) could be developed, that could be used for formal and informal gatherings or performances (Minack Theatre in Cornwall is my inspiration here, <https://www.minack.com/minack-theatre>).
- Similarly on a cultural theme, County Clare has a wealth of talented visual artists, formally and informally trained, provision of more public gallery space, open at times that will be accessible to tourists and the working population would be an asset. Whilst the gallery space in our public libraries is good their opening hours can limit access.

Thank you for the opportunity to input to the forward planning issues for County Clare. I hope my comments will be of use, and that they resonate and reinforce with those of others to help illuminate the direction this beautiful county should go in the years ahead.

Best Regards

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