

Submission: Clare County Development Plan



From Better Ennis
Submitted 16th November 2020



Better Ennis is an independent community group focussing on the impact of the built environment on public health, based in Ennis, Co. Clare.

Better Ennis welcomes the opportunity to submit ideas and feedback "on the 'big picture' strategic issues" for the future direction of the county.



Health

- We would like to see public health as a central criteria of decision-making in planning for the future of County Clare and as a priority in our County Development Plan. Public health is considerably impacted by planning and our built environment. We need to ensure that our County Development Plan has at its core the health of the individual and of the community. Economic, social, cultural and environmental choices can have either significant positive or negative impacts on our health.

- Prevention is better than cure. Health will be impacted by a lot of the key challenges identified in the Issues Paper - mobility, accessibility, reducing emissions, vibrant town centres, housing, living sustainably, accommodating an ageing population, local economy - and we should be looking at preventative health as much as reactive health services.

Our collective physical, mental and social health is impacted by our planning process, legacy issues such as car-centric development has severe and negative consequences to our health and we will need to 'retrofit' solutions to this as we progress as a county.

- Air quality is a particular issue in Ennis town. We would like a strategy for the County to tackle both solid fuel burning (including initiatives to encourage merchants not to choose to sell smoky coal) and traffic emissions. We would like to see real-time, air quality monitoring in every town in the county, in multiple locations including areas that have high volumes of motorised traffic and that this data is made available to the public in real-time.

- Water quality is an issue with County Clare and we would like to see this addressed as a key issue in the County Development Plan - sewage treatments in all villages and towns, clean drinking water, clean bathing water.

Compact Growth & Housing

“Regenerate and develop existing built-up areas attractive and viable alternatives to greenfield development” - RSES Key Principles

- In order to ensure that we are achieving compact growth and reversing the decline in population we need to improve the liveability of our current urban centres. The RSES states that “Equally the focus must be on ensuring a balanced approach and realising the much-underutilised potential in wider rural towns and dispersed communities. There is a key focus on strengthening our smaller towns and villages as well as rural areas.” We would like to see a focus in the County Development Plan on getting people back living in town and village centres.

The COVID-19 pandemic, changes in mobility patterns and the growth in remote working is a unique opportunity to draw people back living in town centres - improving access to services, improving safety (real and perceived) on the streets, bringing back a sense of vibrancy to our town and village centres. We would like to see both ‘carrot and stick’ approaches taken to revitalise our urban centres to avoid buildings falling in to disrepair and dereliction.

- The RSES also indicates that to achieve compact growth, that regions should “Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling, identify brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets” and the MASP “highlights the need to increase residential density in Limerick City and Shannon through a range of measures including, reductions in vacancy, re-use of existing buildings, infill and site-based regeneration.”

We believe the proposed Northern Distributor Road in the current draft LSMATS is at odds with ensuring the compact growth required, given the existing potential already within the urban centres of the area (not just in Limerick City, but in the Limerick-Shannon Metropolitan Area and throughout the County of Clare) and is a poor use of land resources and should not be adopted into the County Development Plan.

- We believe that in order for Clare to contribute to the development of the Mid-West Region, it needs to work closely with its neighbouring counties, and those all along the West Coast. Counties and towns need to come together, not in competition with each other, but rather to ensure that proper connectivity, infrastructure and investment is made for balanced regional development, to avoid the continued tilting of the island of Ireland towards the Greater Dublin Area.

- Single one -off housing should be discouraged as it will only serve to compound problems of social isolation, healthy living, impact on the environment, access to public services, and undermine the resilience of a population in the face of adverse weather events or other emergency crises e.g. pandemic.

Sustainable Mobility and Accessibility

- We hope that sustainable mobility and accessibility is integral to all planning decisions - not solely from a transport infrastructure point of view but the actual siting of housing, services, amenities.

- Active travel networks cannot be simply a series of disjointed components of footpaths and cycle lanes - every town in County Clare needs to have high-quality, inclusive active travel network. These networks need to be direct, cohesive, comfortable, safe and attractive to achieve adequate modal share. All

towns and villages need to have an active travel network between anywhere and everywhere - not simply where there is 'available space' on a road, but rather than space is made for healthy modes of travel, and this is prioritised over private motor traffic.

- We need to ensure that active travel and public transport (including multi-modal) is the mode of choice for the majority of journeys in the county. We need to make sure it is the most convenient, the most competitive, the most attractive between all origin and destinations, and has priority over private motor traffic. This is vital to achieve modal shift, to reduce traffic congestion and emissions, to decrease car centric lifestyles for the health of the population and also to provide equity of access to education, employment, services regardless of socio-economic background, gender, ability.

- The active travel network (including bike parking) needs to accommodate all types of bikes, including trikes, hand cycles, cargo bikes. Public transport in the County needs to be fully inclusive and adhere to Universal Design standards, including stops, shelters, stations, bathrooms as well as the bus and rail fleet.

- The problem of poor permeability in existing housing estates, public-owned centres e.g. hospitals, campuses, and business parks needs to be addressed in order to enhance active travel networks.

- The County Development Plan needs to demonstrate a clear strategy to reducing private car dependency in the region and for sustainable transport connectively within and beyond it, for example, we would like to see the inclusion of a rail spur from the main Galway to Limerick line to service Shannon Town, Industrial Estate and Airport. Frequent direct rail services need to run between Shannon, Limerick, Ennis and beyond to Galway, Dublin, Cork and Waterford.

- We would like to see the County Development Plan include a strategy to achieve an efficient, joined-up thinking approach to sustainable transport across the county, including ticketing, multi-modal opportunities with bike and ebike shared schemes, on-demand feeder electric shuttles in both urban and rural areas, and bus and rail connections outside the area. We need to reduce car dependency, in particular for the high number of private car short journey trips and the majority of town (core) centre on-street car parking should be removed with the exception of disabled car parking spaces.

- As adopted in many cities internationally and in line with the UN General Assembly endorsement of 30kmh urban defaults, we would call for a 30km/hr default speed limit applied to all built up areas to help reduce fatalities, injuries and to provide better conditions for those embracing active travel in the area.

Economic, Enterprise & Retail

- In order to revitalise our city, town and village cores and address high vacancy rates, we need to encourage people back to living in town centres - this adds to vibrancy of a town and improves the real and perceived sense of safety on our streets. We would like to see the County Development Plan recognise the need for high quality urban design and architectural expertise being required in terms of housing design, conservation, public realm, streetscapes.

- Pandemic and recession aside, the current biggest challenge to town centre shopping is online shopping. We need to improve the experience of our town and village centres so that people will enjoy spending time there. People attract people and we need to ensure that our town and village centres are places that are healthy, calm, stress-free environments. Inclusive, public spaces and active travel networks also provide opportunities for more social interaction leading to better social cohesion and advanced social capital.

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- We would like to see the County Development Plan outline how town and village centres should be viewed as stopping points, meeting points, places for social interaction - that our streets should be multi-functional and welcome everyone of all ages, genders and abilities. We would like to see a development plan that discourages town core centres being used simply as thoroughfares and discourages on-street car parking and through traffic which blocks both movement of people and visual access to shops and streets.
 - With the collapse in the aviation industry as a result of the COVID-19 pandemic, we would like to see the Clare County Development Plan focus on ferry, rail, Greenway and Blueway connections to develop Sustainable Tourism offerings in the Mid-West. Greenways need to be designed with a view to providing local community utility use for nearby towns and villages, in addition to tourist and recreational use. We need joined up thinking around international arrivals on ferries, bus and train connections, passenger and bike capacity on public transport, bike and boat rental, town and village accommodation.
 - We would like to see a Regional Freight Rail Strategy included in the County Development Plan acknowledging the potential of connecting up Foynes port with the Limerick-Shannon-Ennis area, and rail connections with Dublin, Cork, Galway and the Western Rail Corridor.

Community Engagement & Transparency

- Given the frequent difficulties with improving permeability and roll-out of active travel interventions due to lack of community engagement, we would like to see the establishment of a Citizen Engagement Office with a particular focus on continuous community engagement so that planning and development plans can be discussed, public realm and active travel interventions can be trialled, evaluated and improved on an ongoing basis.

Climate & Sustainability

- RSES itself is now outdated in referencing the Climate Act of 2015 and Climate Action Plan of 2019, and not aligned with the revised and more ambitious national targets as outlined in the Programme for Government and international EU targets. We would like to see the County Development Plan ensure that the County is contributing to successfully achieving climate action targets - both national, EU and under the Paris Agreement.

- As outlined in the RSES, “between 2006 and 2016 the highest rates of population increase were in commuter areas near to Cork and Limerick Cities and in areas close to other larger settlements. Population decline was also experienced, primarily in rural and peripheral areas, with the largest decreases recorded in areas of Clare, Kerry, Limerick and Cork.”

In order to ensure that we are achieving compact growth and reversing the decline in population we need to improve the liveability of our current urban centres. The RSES states that “Equally the focus must be on ensuring a balanced approach and realising the much-underutilised potential in wider rural towns and dispersed communities. There is a key focus on strengthening our smaller towns and villages as well as rural areas.” This further negates the need for the Northern Distributor Road and the proposed SDZ development if we are to strengthen our smaller towns and villages in County Limerick and County Clare.

- The RSES indicates that to achieve compact growth, that regions should “Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling, identify brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets” and the MASP “highlights the need to increase residential density in Limerick City and Shannon through a range of measures including, reductions in vacancy, re-use of existing buildings, infill and site-based regeneration.”

We believe the proposed Northern Distributor Road in LSMATS is at odds with this approach and not required, given the existing potential already within the urban centres of the area and is a poor use of land resources and should not be adopted into the Clare County Development Plan.

Vision & Brand

- We do not believe that the development of a unique identity is a key challenge for the County Development Plan. We feel that Clare has its own unique environment, traditions and sense of place and that these should be encouraged and supported from the ground up, rather than as a top-down branding exercise. If we can build and improve people's health, wellbeing and quality of life, people will enjoy living and working here, more people will be attracted to the area to live, to set up business, or to visit.
- We believe that the current vision is now outdated. We would like to see a new vision focussing on quality of life and health for all people living or working in the County, setting out a belief in the value of community building among people already here and people new to the County. We would like our new vision to acknowledge that our unique environment, natural and built heritage has intrinsic cultural and societal value as well as its tourist and economic value.

