



Clare Public Participation Network  
Clon Road Business Park  
Clon Road  
Ennis  
Co. Clare  
086-1617375  
[www.clareppn.ie](http://www.clareppn.ie)

March 8<sup>th</sup> 2019

Clare PPN welcomes this opportunity to make submissions on the Draft Regional Spatial and Economic Strategy for the Southern Region and thanks the Southern Assembly staff for their efforts in promoting and explaining this opportunity.

Clare PPN is a network of 275 Community and Voluntary Groups active in County Clare and is jointly funded by Clare County Council and the Department of Community and Rural Development. Clare PPN is managed independently by an elected secretariat from community groups in the county. This submission represents the views of the members of Clare PPN who chose to participate in this consultation either by survey, email, or at our focus group as well as presenting the priorities selected by our general membership as decided at our twice yearly plenary meetings of which the last was held on December 6<sup>th</sup> 2018.

It should be noted that this submission contains various points of view and perspectives. Clare PPN wishes that all would be taken into consideration in this consultation on the Draft RSES.

### **National Strategic Outcomes and the Strategic Investment Priorities**

Please note that these are listed below in order of importance to Clare PPN's respondents:

1. Transition to a Low Carbon, Climate Resilient Society
2. Strengthened Rural Communities & Economies\* (Clare PPN requests that this word order be used in the RSES)
3. Access to Quality Childcare, Health, and Education Services
4. Sustainable Management of Water, Waste and other Environmental Resources
5. Sustainable Mobility
6. Enhanced Culture, Amenity & Heritage
7. Enhanced Regional Accessibility
8. A Strong Economy supported by Enterprise, Innovation & Skills
9. High-Quality International Connectivity
10. Compact Growth

Clare PPN also suggests that the protection, enhancement and conservation of biodiversity be listed as one of the National Strategic Outcomes rather than incorporated in 'Heritage and Environmental Resources'. Clare PPN notes that it is estimated that 60% of biodiversity has already been lost and wishes to stress that the preservation of biodiversity is essential for human life. Clare PPN respondents noted that biodiversity is an area that needs to be budgeted for in national and regional planning and that compensatory measures for any damage or displacement caused by development need to become part of all strategies including this one and others which relate to it such as the NPF.

## **Environment:**

It should be noted that all our respondents agreed that transition to a low carbon and Climate Resilient Society was their number one priority and Clare PPN would like to see this prioritised and emphasised throughout the RSES. Clare PPN would like to see the term Climate Change replaced in the strategy with the words **Climate Emergency**.

Clare PPN notes that the RSES details plans for the next 12 years for the Southern Region and wishes to highlight that this is the same time span in which the UN Intergovernmental Panel on Climate Change estimates that we can act to keep global warming under 1.5C and that unless we succeed in this initiative we will be contributing to the development of unliveable conditions of extreme heat drought and flooding in many parts of the globe as well as here in the southern region of Ireland.

On this basis Clare PPN calls for the RSES to be adapted to include ambitious and urgent strategies in terms of phasing out fossil fuels, and fossil fuel infrastructure, with particular reference to the proposed LNG terminal in the Shannon Estuary which will expand the infrastructure for fracked gas in Europe and is likely to deepen our dependence on fossil fuels rather than act to diminish it. Clare PPN has adopted a motion that this development should not be given the go ahead.

Clare PPN further calls for the RSES to focus on plans for a 'just-transition' which protects the livelihoods of those likely to be affected, in particular staff at Moneypoint and those involved in farming and mono-crop forestry who may need to be diverted.

Clare PPN members wish to ensure the true cost of renewable energy is assessed before permitting developments with use of robust and proper Environmental Impact Assessments. They noted that currently Ireland is operating a flawed EIA methodology for large scale infrastructure projects. The Derrybrien case ECJ/ 215/06 against Ireland for failing to adequately transpose the EU EIA Directive remains unresolved 12 years on. This plan should insist on adopting a more rigorous EIA methodology in line with the Directive regardless of central governments tardy approach.

Further to this Clare PPN wishes to see targeted encouragement for in particular community led renewable energy projects developed in a sustainable fashion and a focus on the removal of barriers to micro generation, energy co-operatives, and collaborative sustainable energy projects. It is noted in particular that the ability to construct local energy networks and to sell surplus energy to the national grid are crucial to encouraging communities to become energy self-sufficient. Clare PPN further stresses that energy intensive development projects e.g data centres should be required as a condition of planning to provide for their own energy needs from renewable sources and that this

should be specifically noted in the RSES. Clare PPN also calls for the immediate removal on the total ban on private energy networks with the substitution of regulations for private and cooperative energy networks for which there should be a public consultation to set out the terms. This is something that Clare PPN would like to see being done within six months and considers that there are likely to be few barriers to this as such regulations are already in operation in other EU countries.

Clare PPN would like to see a specific requirement placed on the National Transport Authority that requires the use of electric powered vehicles where possible with a five year transition to an all-electric fleet supported by capital grants for vehicles and infrastructure.

Clare PPN calls for the inclusion of local environmental NGO's in the planning stages of all elements of this strategy, to access and tap into the wealth of knowledge that is available to ensure a bottom up approach is prioritised and acted upon as promised by the Sustainable Development Principles agreed at Rio in 1992, signed up to by the Irish State and by which this Strategy is informed and guided.

Clare PPN noted that on the issue of biodiversity in particular that multi annual secure state funding for the National Bio Diversity Data Centre is crucial. Clare PPN notes that it is impossible to make good policy in the absence of proper information and as such Ireland needs to resource this. Clare PPN notes that from the point of participation and behaviour change that the National Bio Diversity Data Centre is a leader through its Citizen Science initiatives.

Clare PPN welcomes the fact that the Sustainable Development Goals are incorporated as part of the Draft RSES. It notes however that member groups of Clare PPN take issue with goal number 8 which links decent work with economic growth. Clare PPN considers that this should be replaced with a commitment to circular economies and alternatives to increased production, consumption and commodification as a means of generating livelihoods and ensuring that people and communities needs are met.

Clare PPN members noted that ecological corridors are also essential connectivity objectives to enable biodiversity to survive and adapt. Linear native woodlands adjacent to railway and motorways/roads, as well as Riparian corridors of linear native woodlands alongside rivers and streams need to be included in all plans for connectivity with adequate funding as a percentage of the overall budget front loaded.

## **Water:**

Clare PPN notes the poor condition of both Ireland's water supplies and its waterways as habitats and calls for immediate action to be taken. In particular Clare PPN notes that the issue of leakage within the state owned system and calls for it to be invested in immediately and this paid for through general taxation, including taxation of multi-national companies who must be made to contribute an effective 12.5 percent corporate tax rate whilst this remains state policy.

Clare PPN members also noted that the state's provision of treated water for non-essential purposes needs to be revisited with planning, regeneration and construction methods

seeking to prevent this non-essential usage and prioritise the use of grey water for non-essential purposes. Clare PPN notes that the Southern Region has abundant sources of water which will support its population growth so long as stewardship of this natural resource is prioritized. Clare PPN members would find themselves more in favour of an urgent strategy to fix leakages in the Urban Dublin area combined with proper re-use and conservation policies rather than to see significant infrastructural investment go towards diverting regional water sources to the capital.

Clare PPN also notes considerable opportunity for households and in particular businesses to make proper use of run-off rainwater and requests that provisions and requirements and encouragement for this be included in all planning.

Clare PPN members also recommended that in regards to the protection of water that increased use of natural water treatment facilities such as reed beds, use of native woodlands to protect, and filter natural water aquifers and underground streams should be supported and that we should move away from chemical treatment of water resources especially Chlorine.

One of our members noted 'Billions of gallons of water a day flow into the seas North, South, East and West from our rivers. Why can't there be containment strategies put in places where rivers are low land, especially in places where there is a usual risk of flooding, a series of necklace reservoirs and diversions to present reservoirs could help water management. Canals already in situ could also be used to service areas in need of water. Management is the key really to the problem rather than huge expensive pipelines.'

### **People and places:**

Clare PPN welcomes the commitment to place making within the Draft RSES.

### **Housing:**

Clare PPN members have repeatedly adopted a position which favours a human rights approach to housing. Clare PPN notes that the current housing strategy for Ireland 'Rebuilding Ireland' fails to provide for adequate well-serviced secure housing for all sectors of Irish society. Clare PPN wishes to see a commitment to state owned social, affordable and cost rental housing explicitly contained within the RSES. In particular Clare PPN notes the lack of uptake on the various schemes designed to encourage private investors and property owners to regenerate derelict and unoccupied properties in town and village centres. Clare PPN considers this an essential requirement for regional development and wishes to see this RSES prioritise this as an area for direct state investment in social housing. Clare PPN notes in relation to housing that people with disabilities, and the Traveller community in particular have been failed by state provision of suitable culturally appropriate housing and living environments and wishes to see explicit and specific commitment to both communities detailed in this RSES from where it will make its way into subsequent local policies. Clare PPN's wishes to see a reorientation away from private landlords, hoteliers, direct provision and homeless hub operators when it comes to the provision of housing. Clare PPN in particular favours a cost rental model where the state builds or buys properly serviced housing and retains it in state ownership as an asset. This practice exists in many European capitals and has seen them avoid or minimize the type of crisis we are now experiencing.

Clare PPN members have noted that all new and regenerated developments should be required and resourced to be energy efficient and where possible to incorporate energy generation technology in their planning. Members also called for integration of green infrastructure into all new and regenerated developments to include adequate green spaces and use of native trees and plants for all planting schemes. Creation of community native woodlands adjacent to and wildlife corridors intimately and between housing clusters.

### **Services**

Clare PPN members call for the restoration of a 24 hour accident and emergency services in Ennis hospital and note that suggested population growth would necessitate this.

Clare PPN members also proposed the idea of a state health guarantee for regional areas which would involve areas which reached a certain level of population to be guaranteed the resources for sufficient, efficient, local health services. Clare PPN noted that regional development will be hampered if this is not provided. Clare PPN members also noted that the staffing shortages in the HSE must be rectified by both restoring salaries to nursing staff and making regional hospitals good places to work and in so doing supporting people to live and work in the area.

Clare PPN notes several small scale community led social enterprises such as community shops which have filled existing needs in communities and Clare PPN calls on this RSES to include under 'placemaking' the provision of public non-commercial spaces in which communities can engage create and thrive. Clare PPN notes the focus on Shannon as key area on which the RSES focusses and as such would like to see a commitment to support for the community there who are working to provide a heart or centre to their town within the RSES. Clare PPN would like to see social innovation supported and a recognition that communities must have spaces in which to regenerate connections, for recreation and for service provision.

### **Carework, Child Care and Personal Assistants**

Clare PPN wishes to see a commitment to decent work reflected within all of the above sectors in the region. Clare PPN considers that all of the above roles are ones that are essential to the proper functioning of community and society particularly in regional areas and yet they are poorly paid, provide little security and do not enable people to live and work in a sustainable fashion and raise families in the county. Clare PPN notes that care work has an over representation of women in the work force and that the precarious nature of this work means that those employed are frequently amongst the working poor. Clare PPN wishes to see the RSES recognise within it that decent work which is decently paid and secure delivers benefits above and beyond those provided by state welfare supports.

### **Rural Resettlement:**

One Clare PPN member noted that they wished to see a resurrection of the Rural Resettlement Scheme which previously operated in Clare. Others noted however that any relocation scheme must consider the needs of the host community, the suitability in terms of skills, interests and resources of those settling in rural areas. Projects such as Grow Remote which sought to encourage skilled people to consider working remotely were viewed more favourably.

**Disability and livelihoods:**

Clare PPN notes that recent studies demonstrated that only approximately 33% of people with disabilities were in employment. Clare PPN's members with disabilities note that in rural areas lack of transport and lack of employment can exacerbate the situation. Even though work practices are likely to change considerably in the future Clare PPN would like to see all commitments to decent work opportunities as listed in the SDGs and in the RSES explicitly include strategies for properly paid decent work to be created by and for those with disabilities along with the removal of barriers for this group of people to progress to third level education. Clare PPN considers that affirmative action is necessary in this regard and in particular the frontloading of resources now for personal assistants so that people with disabilities can develop their potential and in so doing resource themselves for the future.

**Diversity and inward migration:**

In relation to both community and economy Clare PPN notes that within County Clare there are currently two direct provision centres for international protection applicants which between them host approximately 400 people. Whilst Clare PPN notes that the human right to seek asylum must be protected for its own sake in order to respect the human rights of those involved we also note that the presence these and other diverse groups in our communities is a considerable opportunity for the region in particular given the new work permit system which allows some of those within the IP system to take up employment. Clare PPN members have repeatedly adopted a position opposing direct provision as a method of meeting the accommodation needs of international protection applicants and we consider that for whatever length of time people remain in Ireland they should be afforded the opportunity to fully participate and contribute to the communities they live in. Clare PPN considers that all plans regarding housing provision, education, health services, skills shortages, and rural depopulation should make provision for the inclusion of asylum seekers and refugees into communities whether on a temporary or long term basis. Clare PPN considers that the region can hugely benefit from the radical inclusion of international protection applicants into communities, workforces, education systems, and social activities. Clare PPN members noted that even in the area of language skills in post Brexit Europe the presence of people from a variety of countries and cultures is likely to advantage the region significantly.

**Future work and economic opportunities:**

Clare PPN members noted that they are exasperated with waiting for the provision of high speed broadband in certain areas. It was noted that in certain areas of Clare it is not even possible to get a phone signal. They identified this as a barrier to all sorts of enterprise, connectivity and creativeness. It is also a barrier for those who might wish to work remotely in Clare as well as for those who might wish for various reasons to work from their homes- all of which approaches are likely to increase in the future.

Clare PPN notes that more than ten areas in Clare fall within those classed as disadvantaged in the Pobal Deprivation Index. Clare PPN considers that the RSES as a Twelve Year Strategy has the opportunity to set out ambitious targets in which people can reach their potential for sustainable fulfilling lives. Clare PPN requests that community groups, community development organisations, and educational organisations should be resourced to sufficient levels to allow them to work with disadvantaged communities so that these communities can secure real intergenerational change for those most affected by poverty. Clare PPN notes that women and in particular single parents experience extreme disadvantage in Clare and has submitted a separate submission dealing with this issue in collaboration with Clare Women's Network. The RSES and all related national strategies must include specific measurable commitments and budgets for achieving poverty reduction and dealing with issues of addiction and social deprivation. The nature of rural and regional deprivation is particular and as such includes the farming community, those in urban areas experiencing intergenerational disadvantage, the Traveller and Roma communities, older people, single men, people with disabilities, asylum seekers, and those with mental health difficulties. For sustainable development based on the Sustainable Development Goals which Ireland has signed up to it is urgent that these groups receive specific enabling resources targeted at assisting them to participate in and contribute fully to their communities and that this is taken into account at an infrastructural and economic planning level. Clare PPN members have noted that the provision of funds and resources at the most local level is what has served them best previously.

Clare PPN members recommend that initiatives to promote the sustainable use of local resources such as natural and semi natural woodland and hedgerow management to provide biomass for local CHP energy sources with high end craft uses to sustain local meaningful employment are promoted.

Clare PPN recommends the adoption as state policy of a living wage as an alternative to the current minimum wage system. Clare PPN recommends that innovation in work and social welfare arrangements be prioritised and that welfare traps are eradicated through anti-poverty strategies.

Clare PPN considers that the Southern Region could benefit from the introduction of such schemes as Universal Basic Income so long as access to health, education and housing supports are continued. Clare PPN considers that such a scheme would improve wellbeing, remove stigma and facilitate creativity and innovation. Clare PPN considers that the time limited Back to Enterprise Allowance scheme is a good model for this and that it should be expanded to support the creation of small scale enterprises.

Clare PPN members have called for artists, musicians, creative industry workers and crafts-people to be supported within the region. It notes that these are amongst the people who make regions great places to live, and that they contribute hugely to tourism, and to a sense of community and belonging for all of those who live in the area. Clare PPN wishes to see people supported to live creative lives and that festival organisers and venues should be included as strategic assets when any community is evaluated.

### **Farming and Land Use:**

Clare PPN calls for this RSES to recognise and plan for food security, and in fact food sovereignty. The southern region includes some of the most productive and fertile land in

Website: [www.clareppn.ie](http://www.clareppn.ie) Twitter @clare\_ppn Email: [info@clareppn.ie](mailto:info@clareppn.ie) Facebook: <https://www.facebook.com/clareppn/>

Ireland however export-led intensive farming practices are in contradiction with both our commitments to reduce emissions and with sustainable land and biodiversity management. Clare PPN notes that Government policies and management of both dairy and beef farming are unsustainable. It also notes that farm incomes in Clare are frequently below minimum wage levels for those involved and that the age profile of farmers in County Clare is rising with few younger people choosing to continue. Clare PPN considers this to be a crisis situation and that an immediate strategy needs to be developed which supports farmers through a just transition, rewards them for their environmental good practice and which ensures that Ireland develops a sustainable local food production strategy to serve us into the future. Clare PPN would like to draw attention to the opportunities provided by such examples as Burren Beo, Moy Community Farm, and the new organisation Talamh Beo.

Clare PPN also calls for all state policy and funding to be diverted away from the plantation of Sitka spruce plantations which are currently over-dominating the forestry industry and are damaging for habitats and function poorly as carbon sequestration due to the type of land on which they are frequently planted. This RSES should include a commitment that this policy will be altered to favour native broadleaf species of tree and to continue with Ireland's commitment to re-forestation,

### **Tourism**

Clare PPN notes that there are ongoing consultations in the county regarding the development of tourism strategies. Clare PPN members have been to the forefront of refreshing the thinking around tourism in the County. Clare PPN calls for the RSES to engage with and strategize around tourism from the point of view of the needs of the host communities, the environment, and the local economy. Clare PPN notes that fewer high value tourists are preferable to large numbers who inconvenience local communities without providing sufficient compensation through decent work or opportunities. Clare PPN notes that its members favour

### **Transport/ Connections from Clare to elsewhere:**

Clare PPN would like to see services such as Clare Bus or others expanded in the region. Whilst we note the RSES's ambition in achieving population densities in areas which will allow walking and cycling to become real factors in the transport infrastructure. This will need to be backed up by a proper public transport system which sees regular dependable routes around the county which link with national and intercity transport and will facilitate both locals, students and visitors. It is clear to Clare PPN members that this system will need financial support and that vehicles will need to be electric and possibly mini- bus sized and be able to cater for those with disabilities however this is something that will deliver a social dividend in terms of health, wellbeing and social development and will make the county more attractive to live in.

Further to this Clare PPN would like to see a commitment to the provision of charging points for electric cars and public busses along the tourist and commuter routes in the region. Clare PPN would like to see this highlighted for action in the earliest phase of this RSES. Clare PPN notes that the transition to use of Electric Vehicles is likely to lag behind the infrastructure provision and so considers this an immediate action which can be implemented without delay

Clare PPN notes the contradictions between calls for the development of Shannon airport and the environmental commitments of the RSES. Clare PPN notes that there is a considerable skill bank in the Shannon Industrial region and hopes that the region will embrace support and resource innovation in terms of battery and partial battery powered aircraft. Clare PPN notes that at present one company predicts that it will be in a position to operate commercial short range flights within this decade with others predicting a range of 1000km as an achievable target in 2030- 2035 and this time scale falls within the scope of this RSES.

Clare PPN members have highlighted their opposition to military use of Shannon airport and have requested that it not be used for any military purposes except on the basis of a UN resolution.

In conclusion Clare PPN notes and welcomes the focus on education and enterprise development included within the Draft RSES. Clare PPN recognises that many of the suggestions, recommendations and projects listed in this submission require considerable financial investment to make them a reality, however our members consider that to really enable regional development in County Clare upfront investment is required and that it will in the long term create dividends of equality, wellbeing and sustainable living. Clare PPN is certain that when people are afforded the opportunity to live full lives and reach their potential that they will deliver benefits for the whole community, society, environment and economy.

Clare PPN looks forward to continuing to engage in this process and welcomes any communications or queries in respect of this submission.

Sarah Clancy

Clare Public Participation Network Representative Coordinator.

[admin@clareppn.ie](mailto:admin@clareppn.ie)

087 1617375