



Clare Public Participation Network
Clonroad Business Park
Clonroad
Ennis
Co. Clare
086-1617375

www.clareppn.ie

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

February 24th 2021

Clare PPN (CPPN) is a network of 302 community, voluntary, environmental and social inclusion groups from Clare. It exists to facilitate the formal participation by the community sector in Clare Co Co'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 Co Co 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 <https://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 in relation to Irish Water's public consultation on its first National Water Resources Draft Framework Plan (NWRDFP) for its environmental college and Clare Environmental Network on February 22nd 202. This submission is the result of that workshop and previous work done by the above groups in relation to consultations on the management of water and catchment areas.

We welcome this opportunity to provide input to Irish Water's Consultation and recognise the substantial work including case studies, video guides etc done by Irish Water in preparation for this public consultation.

This submission is informed by the following policy or strategy documents

[Regional Spatial & Economic Strategy for the Southern Region](#)
[National Planning Framework Project Ireland 2040](#)
[National Development Plan 2018-2027](#)
[Water Framework Directive](#)
[River Basin Management Plan 2018- 2021](#)

Our workshop participants wanted to make the following points for consideration at this stage of the consultation and they look forward to continuing to participate as the regional management plans are developed.

1. Climate Crisis:

Clare PPN note that Clare is one of the Counties most likely to be affected by sea level rises and flooding from extreme weather events. Our participants noted that a 25-year resource management plan needs to take concrete account of our warming climate. They have noted that this Water Resource Framework Plan will run until 2046. **The most favourable outlooks and action plans expect that at current temperature rise rates we will reach 1.5 degrees of global warming between 2030 and 2052.** The UN has noted that current commitments on emissions are not sufficient to keep warming temperatures below a 2 degree increase. Our members would like to see this situation and its potential for impacting our current and future water sources given a more prominent position in the NWRDF and included as a risk category in every assessment of options.

2. **Published baseline and annual usage statistics.**

In support of the proper planning for management of water resources Clare PPN would like to see Irish Water publish annual usage statistics that would be available to assist people in planning, prioritising, and conserving water. This usage would need to be broken down regionally but also on a sector and activity basis to include industry, technology including data centres, commerce, private, public service and public buildings, agriculture broken down into grain, dairy, beef, biofuels, other livestock etc.

3. Bi- annual Public Review

In relation to the above and to other aspects of the NWRDF, our participants would like to see a commitment to a bi-annual review with public participation of both the framework and the various regional and implementation plans which devolve from it. This would be essential to ensure flexibility and renewed risk assessment in the face of an uncertain climate and changing weather patterns. Clare PPN participants noted that the SEA contains clear objectives and targets however we were unable to establish where accountability for monitoring these lies. We request that Irish water revert to us on this issue.

4. Democratic Oversight and Public Ownership of Water Resources

Clare PPN's participants favour and call for a guaranteed public ownership of all significant national water resources and would like to see this commitment made in this 25 year plan. We have noted the transfer of responsibility from Local and National Government to Irish Water and are concerned at the lack of democratic oversight that this circumstance creates despite this and other public consultations. Our concerns relate to the management of an essential natural resource and whilst our members will advocate through other channels on this issue we also strongly request that Irish Water itself seeks to raise and address this issue itself. Further discussion on how this could be achieved is necessary but taking into account and as noted in Irish Water's Non-technical summary there appears to be no legislative framework in Ireland which sets the standards for the development of this plan and that is something that we consider essential.

5. Options Assessment Process:

Clare PPN's workshop participants wanted to raise two issues in relation to the proposed options assessment process as detailed in the Draft Framework- the first of those is that our members wish that an outline of what weighting would be given to each criteria at '**Approach Development: Stage 7 : Testing a range of approaches**' should be included in the framework as it is not possible to evaluate whether the assessment process will serve society unless it is clear which criteria will be prioritised. The second issue they wished to have addressed in the framework is that the social and community impacts of all options need to be front and centre of considerations –while they accept that to a certain extent this is dealt with in the SEA and AA they would like to see it included as a defined step in the options assessment process. Our members are concerned that the framework as currently constructed is oriented towards providing solutions to supply in the areas of greatest population, and whilst this is understandable, there is also a need to include balanced regional and rural development in this plan.

6. Local Task Force

Clare PPN has become extremely concerned that access to both water and waste water treatment services is adversely affecting rural development in County Clare. This is a situation exacerbated since the transfer of management of water resources from Local Authorities to Irish Water. As it currently stands, land now zoned for development will lose its designation if Irish Water does not propose to provide infrastructure within the life of each successive County Development Plan. As previously mentioned there is no democratic oversight or accountability process for our members, elected councillors or Local Authority so that they can ensure that developments necessary to prevent rural depopulation and to promote rural economic and social development in the county are prioritised. Clare PPN strongly considers that an intervention by national government is necessary on these grounds and we further propose that Irish Water could itself set up a structure whereby it puts in place local task forces and works with them to establish the priorities for the County to ensure the best outcomes. Clare PPN notes too that as a national body the system of priorities which Irish Water establishes for itself may be extremely damaging for areas with low populations, and we recommend that below certain levels of population (eg. areas with a population less than 1,000 people) that local solutions, supported by Irish Water should be facilitated. Clare PPN notes that several areas of Clare are frequently under boil water notices and indeed supply interruptions. Our concern is that in this framework the priority of tackling larger infrastructural projects may mean that interim, temporary, or short term measures which are necessary for the sustainability of rural communities and businesses may be overlooked and cause damage to our communities. We suggest that an inclusion of a commitment to provide local small scale remedies is at least noted in this NWRDF.

7. Grey Water/Rainwater Harvesting

We note a concerning lack of reference in the draft framework to either grey water usage or rainwater harvesting. As noted above a Water Resources Management Plan needs to ensure the most efficient use of available resources and we consider that education and action plans around both of the above issues are essential for this plan in its aims to 'Use Less, Lose Less and Supply Smarter'.

8. Quick Wins – Lose Less

Our participants were concerned at the level of leakage of treated potable water that continues to be an issue in Ireland. We recognise the infrastructure deficits that exist and indeed recognise and commend the fact that Irish Water has overseen a reduction from 47% to 43% since. Our participants have noted that there are rapidly advancing technologies around pipe maintenance and leakage which do not always necessitate replacement or excavation of existing pipeworks. Our group also noted the historically low interest rates available

for borrowing at the moment and note that this makes it an opportune time for investment in infrastructure. They would like to see Irish Water outlining what they termed a 'quick win' strategy which evaluated which repairs, either small, medium or at infrastructure level were possible to deliver in the short term and what the benefits of these might be for the overall water distribution networks. They called on Irish Water in this respect to take what remedial action is feasible on a cost benefit analysis basis as soon as is possible even if these are temporary leakage prevention measures which will need to be replaced in the longer term with durable sustainable solutions.

9. Geographical Coherence

Finally, our participants were concerned with the geographical regional divisions as identified in the NWRDF. They noted that the county of Clare will be split into two separate regions and considered that this could cause difficulty in the preparation of County Development Plans and other such county or regional based planning structures such as the Regional Economic and Spatial Strategy. Clare PPN recognises that water sources span county boundaries, however given that most democratic structures operate within County Boundaries we see this as being likely to cause competition for water investment between neighbouring counties rather than collaboration. Clare PPN would request that the regions should be mapped on existing regional planning divisions such as those used by the Southern Regional Assembly.

Clare PPN /CEN welcome the opportunity to make this submission in respect of the National Water Resources Draft Framework Plan 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 and look forward to engaging further in the process.

Your sincerely on behalf of Clare PPN,
Dr Tracy Watson,
Clare PPN Secretariat Member
Sarah Clancy,
Clare PPN Coordinator