



SUBMISSION TO CLARE COUNTY COUNCIL Draft County Development Plan 2023-2029

Clare Public Participation Network Social Inclusion College

Abstract

Submission on issues of social inclusion for consideration in response to the public consultation on the Draft Clare County Development Plan 2023-2029

CLARE PUBLIC PARTICIPATION NETWORK
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Information on Clare PPN:

Clare PPN is a network of 342 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three ‘Colleges’ which gather the member groups in terms of their interests and activities – these are environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision-making structures and to serve as a support and information sharing network for 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.

This submission was compiled by those members of Clare PPN's Social Inclusion College who participated in our consultations, meetings and discussions regarding the County Development Planning process.

Previous Submission:

In November 2020 members of Clare PPN Social Inclusion College made a very comprehensive submission to Clare County Council, into the pre-drafting of the County Development Plan with reference to the Regional Spatial & Economic Strategy for the Southern Region, National Planning Framework Project Ireland 2040, National Development Plan 2018-2027, Local Economic and Community Plan 2016-2021, Sustainable, Inclusive and Empowered Communities, National Traveller & Roma Strategy and the Catherine Day Report on Ending Direct Provision. Everything submitted therein still applies and can be accessed at this link:

<https://clareppn.ie/wp-content/uploads/2020/11/Clare-PPN-Social-Inclusion-Submission-to-Clare-County-Development-Plan-2022-2028-November-2020.pdf>

The Sustainable Development Goals

In September 2015, the 2030 Agenda for Sustainable Development was adopted by all 193 Members States of the UN. This framework is made up of 17 Sustainable Development Goals (SDGs) which cover the social, economic and environmental requirements for a sustainable future

Clare PPN's Strategic Plan 2022-2026 is informed by the Strategic Development Goals and we would like to remind local and national governmental bodies of their social, economic and environmental obligations as signatories. Clare PPN's Strategic Plan can be accessed here:

<https://clareppn.ie/wp-content/uploads/2022/01/Strategic-plan-2022-2026.pdf>

‘As a universal goal, social inclusion aims to achieve an inclusive society that entails respect for human rights, cultural diversity and democratic governance, and upholds principles of equality and equity. As a process, it enables all citizens’ participation in decision-making activities that affect their lives.’ – GSRDC.org

Within the context of this social inclusion submission to the Draft County Development Plan, Clare PPN believes that the Goals are inextricably linked in achieving these aims and should be referenced and integrated throughout the Plan.

THE GLOBAL GOALS

For Sustainable Development



Clare PPN Wellbeing Vision Statement for County Clare:

Clare is 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 can 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.

Commencing in 2020 Clare PPN undertook a consultative project to develop a Wellbeing Vision for County Clare and each of its municipal districts. These wellbeing visions set out aspirations and desires for the future of County Clare. **We would like Clare County Council to consider the key aspirations in these vision statements when finalising the Draft County Development Plan.** The Wellbeing Visions for each area can be read here: [Wellbeing Statements | Clare PPN](#)

‘Inclusivity’ has been named as one of the Five Strategic Development Plan Principles in the Draft County Development Plan, therefore Clare PPN Social Inclusion College welcomes the opportunity to make the following further submission.

Chapter One: Socio Economic Rights and Anti- Poverty:

Clare PPN’s submission is informed by the International Covenant on Economic Social and Cultural Rights and our understanding that socio-economic rights *‘are those human rights relating to the workplace, social security, family life, participation in cultural life, and access to housing, food, water, health care and education’* and that the Local Authority under the Public Sector Equality and Human Rights Duty has an obligation to protect and progressively realise the human rights of those to whom they provide services to and employ.

Clare PPN Social Inclusion College would like to request that the draft county development plan written statement at Chapter 1, 1.5 under the heading ‘A vision for County Clare is amended to include a statement committing the Local Authority to ‘A County that is committed to **reducing poverty and deprivation** within its population through all its actions and strategies and through proactive collaboration with other organisations in the county’

Chapter Two - Climate Action

Clare PPN welcomes the inclusion of an entire chapter on climate action for the first time in the Draft Clare County Development Plan. Our Environmental College members have made a separate submission on the environmental aspects of the Draft County Development Plan and we do not propose to repeat those here except as they relate to issues of social inclusion, socio economic rights, and sustainable livelihoods in the county. We note however that the aspirations of the chapter on Climate Action are contradicted by other actions and proposals within the Draft CDP and we call on Clare Co Co to address this before adoption of the plan. The coming decade, which this draft plan relates to is a time of make or break in regard to Climate Action. In 2030 one year after the term of the plan Ireland is due to have reduced its carbon emissions by 51% the scale of this change for a county like Clare is immense and this plan needs to reflect that.

We feel that there is a lack of consideration in the chapter regarding how actions impact the lives of marginalised communities and those facing exclusion and/or poverty in Clare. We note current severe increases in energy costs including electricity, petrol, diesel, gas and home heating oil. There is evidence readily available from the CSO and other sources that Clare is an outlier in its dependence on oil fired central heating and on private cars for public transport. Clare PPN social inclusion college is currently working on an Anti-Poverty Strategy for Clare and some of the information gathered so far has demonstrated that 51% fewer people in Clare are able to use public transport than the national average, 59.1% of households in Clare are dependent on oil fired central heating, again this is almost 19% higher than the national average. Areas of Clare experience severe water pollution, including from

farming, forestry and untreated sewage, there are issues in particular areas of the county with poor air quality, access to medical services and hospitals is inferior to other regional centres. The Draft County Development Plan does not in our view include measures around infrastructure and service provision, nor around economic developments which will address the above issues and unless action is taken the population of Clare will continue to experience inferior services and opportunities than are available elsewhere in Ireland. We note from other projects that the NDP and the RESS all take a regional approach to planning and we consider that Clare is poorly served by this approach as it occludes the accurate information needed for planning at a local level.

It is noted that *2.1 Strategic Aims* makes no reference to climate/carbon proofing existing buildings including local authority housing. While a future focus is beneficial there are numerous existing buildings that need significant investment to bring to a suitable standard.

In the Paris Agreement named in *2.3.1 International Context* it states that the Parties to the Agreement emphasise *‘the intrinsic relationship that climate change actions, responses and impacts have with equitable access to sustainable development and eradication of poverty’*. Article 2 again specifies that the Agreement is to be implemented *‘in the context of sustainable development and efforts to eradicate poverty’*.

In the Eurostat Report *‘State of the Energy Union Report 2021’* it was noted that 31 million EU citizens (roughly 7%) live in energy poverty and struggle to keep their homes, and the European Commission recommends *‘moving away from fossil fuels as a way of eradicating fuel poverty’*. Given the current geo-political crisis and our dependence on imported fossil fuels this is increasingly urgent.

- Clare PPN recommends the inclusion of social inclusion representatives on the Adaptation Steering Committee outlined in *2.6.1 Local Adaptation and Business Operations*
- Clare PPN recommends that the Smarter Travel document mentioned in *2.6.2 Infrastructure and the Built Environment* which is currently under review is applied to Clare in a way that promotes universal access to public transport
- Clare PPN recommends that Clare County Council adopt a **living wage policy** and that all economic development, businesses and projects which are supported in any way by the Local Authority must have as a requirement that employees of all ages are paid the living wage in any given year. The living wage is the minimum hourly rate at which a person employed full time with no dependents can be expected to provide for themselves. It is currently set at €12.90. For more information on the living wage see [Living Wage for Ireland](#)
- Clare PPN recommends the insertion of *2.10 Climate Justice* which will commit to protecting marginalised communities by;
 - providing enough good quality affordable housing
 - facilitating the development of renewable energy to cushion energy price fluctuations and to employ local people in areas that have historic under/seasonal employment

- ensuring that climate adaptation/mitigations actions do not further marginalise communities and prevent participation
- removing financial barriers that prevent retrofitting homes that require it, especially in rural communities
- targeting recruitment for renewable energy apprenticeships towards socio-economic communities with few employment opportunities.

Chapter Five Written Statement / Volume 8 - Housing Strategy

Clare PPN Social Inclusion college considers that the draft county development plan in its written statement and housing strategy severely underestimates current and projected housing need in the County even solely on the basis of the figures used in both documents of the projected population increase predicted by 2031. Basically the housing strategy fails to meet the housing need it has itself estimated: household size in Ireland is 2.73 people and the estimates used in the DCDP housing strategy predict a population increase of between 15,000 and 18,000 by 2031 a figure which would require 5,494 homes or dwellings for the lower number and 6593 for the higher figure. These predictions also do not take into account the fact that there are already as of December 2021 almost 3,000 people on the social housing waiting lists in Clare which using the same average household size would require 1300 dwellings. Even using the lower figures from the above would indicate that 6794 dwellings are needed to provide for the population before 2031 and 5,284 by 2029 when the plan ends, however logically going on the current timeline for planning and construction, for a dwelling to be available in 2031 it would have to be planned for in advance of the 2029 conclusion of this County Development Plan. Under the NPF Clare County Council have been allocated a **housing supply target of 4500** units which will be applied throughout the County Development Plan. Even by the most conservative estimates this figure underestimates need by 784 dwellings in 2029. Clare PPN Social Inclusion College are concerned that the draft county development plan does not appear to aim to address social housing waiting lists or to make any interventions in the levels of HAP scheme housing in the county. Clare PPN social inclusion college note that house and apartment prices in Clare have risen by 17.5 percent in 2021, rents by 15.7 % and land prices by 96% in two years to 2021. Along with increases in other household costs (which have a disproportionately severe effect on people in Clare as was detailed under our comments on Climate Action), the current situation looks extremely likely to increase the number of people who require housing supports in the county. We note too that in recent days we have seen nearly 1000 people displaced from the conflict in Ukraine placed in accommodation in Clare and that there are approximately 500 people living in Direct Provision in County Clare and that national policy as per the White Paper on ending Direct Provision details that own door accommodation will become the standard for accommodating international protection applicants. **We do not consider the housing strategy for this draft county development plan to be adequate to meet the projected housing needs in the county.**

Clare PPN understands the constraints posed by national policy on Local Authorities however it considers that the following actions can be taken:

- That in advance of adoption of this County Development Plan that Clare County Council engage with national government and seek an increase in their housing supply targets of at least 1500 units to allow for growth, relocation, migration and addressing the housing needs of those on the housing waiting list.
- That Clare Co Co use this current County Development Plan to really take on dereliction in the county and to seek resources, funding, staff and community support to develop an extensive programme under the Town Centre First Policy that brings 1000 dwellings back into use.
- That it maintains a comprehensive vacant sites and vacant properties register. That all penalties and taxes relating to these are collected in a timely and proactive fashion.
- That Clare County Council where necessary looks at purchasing derelict town centre properties if necessary by using its compulsory purchase powers when it is in the benefit of the wider community.
- That Clare County Council collaborate with Training and Educational Institutes in the county to ensure that a skilled work force of tradespeople, retrofitters and builders are available in the County. Clare Co Co currently only hosts 3 apprentices and this figure could be greatly expanded.
- Clare County Council should work with approved housing bodies including CENA to develop high quality sustainable energy efficient homes for the population including all demographics.

Clare PPN considers it a missed opportunity that consultants KPMG were engaged to do the housing strategy for County Clare, we feel strongly that this strategy needed to be done in consultation with communities in the county. Further to this we note that some of their projections included in the draft county development plan are already demonstrably unreflective of reality and should be corrected in advance of adoption of this plan (house and rent price increases for example). In particular we consider that basing estimates for income growth for the population of Clare on national GDP growth is an unsound basis for making any projections as to the future affordability of housing in the County.

Article 19 of the United Nations Convention in the Rights of Persons with Disabilities (UNCRPD) titled 'Living independently and being included in the community recognises *'the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community'*.

- Clare PPN recommends that universal access to public transport is integral to the provision of housing as outlined in 5.2.10 *Housing for People with Disabilities*. This is vital to ensure full participation in employment, healthcare and leisure activities as described in the UNCRPD (Article 19)

5.2.4 *Emergency Accommodation* must acknowledge that there are a number of those experiencing homelessness who to have difficulty engaging with the Homeless Action Team for various reasons.

- Clare PPN recommends long-term sheltered housing for those who for whatever reason are unable to manage own-door accommodation.
- Clare PPN requests that any mother under the age of eighteen presenting to the Homeless Action Team be facilitated and taken care of with her child/children
- Clare PPN requests that the Homeless Action Team is trained on domestic violence and coercive control so that women and children are fully supported by service providers and not held accountable for the actions of an abusive partner
- Clare PPN requests a policy of emergency outreach and offer of accommodation to anyone on the streets or living in insecure dwellings including trailers should be instigated during red weather warnings.
- Clare PPN requests that Clare County Council should undertake to provide emergency accommodation to all those presenting in need of it irrespective of their immigration or residency status in particular with respect to members of the Roma community.

5.2.8 *Traveller Accommodation* cites the obligation under the Housing (Traveller Accommodation) Act 1998 on Clare County Council to prepare and adopt a Traveller Accommodation Programme (TAP) subject to periodic review. Clare PPN notes the following: The Draft County Development Plan for Clare proposes to rely on the Traveller Accommodation Programme 2019-2024 in regard to the zoning of land for Traveller homes- this TAP was not passed by the LTACC as should have been the case although it was passed by Clare County Council. There was no input to the TAP from the Traveller community in Clare. (See circular 35/ 2018) It is therefore of the utmost importance that a participatory Traveller Housing Needs Assessment is carried out in the county and that at review the current TAP is amended to reflect the actual community needs and that this is then reflected in the County Development Plan which will run until 2029. Development Plan Objective CDP5.10 which aims to provide Traveller accommodation in line with the current TAP is compromised unless this step is taken.

Clare PPN social inclusion college notes that members of the Traveller community are amongst the most marginalised in Ireland and that along with other organisations and services in the County that Clare County Council needs to work proactively and ambitiously on improving the circumstances in which they live. Clare PPN considers it regrettable that Clare County Council continues to engage in costly and protracted legal disputes with members of the community and would strongly recommend that a new approach that seeks to provide sufficient suitable sustainable homes for the community be taken. Clare PPN notes that the vacancy rate of 15% in Traveller Specific Schemes in the county is frequently used by Council officials to denote a lack of demand for this type of accommodation and Clare PPN Social Inclusion College would like to stress that such vacancy rates, or in fact higher figures should be expected due to the tradition and culture of nomadism and to the

practice of living in extended family groupings. Clare PPN Social Inclusion College considers that it would be better practice to plan for such levels of vacancy as a given. Clare PPN further notes that although they make up less than 1/% of the population in Clare that Travellers in 2021 were indicated by Clare County Council to comprise 50% of those presenting as homeless, whilst Travellers as a group are over-represented in the homeless population nationally the figure is 11% which indicates clearly that there is a specific problem in Clare. Clare PPN representatives have repeatedly called for a participative housing needs assessment for the Traveller Community to be conducted in Clare and in this submission we repeat that call without accurate and up to date information it is not possible to plan effectively.

It has been noted by the Clare PPN Social Inclusion Pillar that Housing Assistance Payment (HAP) has become the primary means by which local authorities provide social housing. Simultaneously, investment in direct build social housing remains insufficient. This shift towards a privatised, market-led approach is more costly in the short and long term, ensures that there is no national housing stock to meet the needs of future generations and encourages international investors to monopolise the housing market for a sure return on investment.

- Clare PPN requests that any home approved for HAP be inspected for habitation, health and safety suitability
- Clare PPN recommends that Clare County Council do everything in its power to progressively move away from subsidising the private rental market and invest in publicly owned housing stock instead including through the Town Centre Renewal Policy.
- Clare PPN requests that single occupancy units be an integral part of any local authority housing scheme and that sufficient larger house sizes be provided to cater for the wide variety of family size in the County.

It has also been noted that within one generation, an unprecedented proportion of pensioners will not have the security of their own home or a long-term council tenancy for the first time. Any policy referencing *Housing Options for Our Aging Population (2020)* needs to be cognisant of this new reality when it speaks of downsizing and adapting existing homes for older people.

- Clare PPN recommends that Clare County Council make long-term fixed tenancies for older people (that are not dependent on a private landlord) a priority

Chapter Ten – Sustainable Communities

Regarding section 10.5 *Diverse and Socially Inclusive Society*, Clare Youth Service recently made a submission as part of the Public Consultation on the next Government Policy Framework for Children and Young People in Ireland 2023-2028. In preparing for this submission the Service undertook a consultation with small groups of young people throughout the County to gather their views.

Some of the issues under the remit of Clare County Council are as follows:

‘Of significant concern is the focus on problematizing, stigmatising and labelling of young people. This is creating a further division between those who are perceived to have and those who are perceived to be under resourced. This needs to be tackled before the division becomes deeply and irredeemably entrenched. Ultimately young people who live in poverty will be ghettoised rather than have an opportunity to mix and thrive with their peers. It is worth remembering that many issues can affect all teenagers irrespective of social or economic advantage.’ Q2

‘There is a need to invest in Youth Services for all young people. All young people should be able to meet with their peers in safe spaces, accessing support from trained volunteers and staff. [...] Secure and long term commitment to investing in community based Youth Services is key to long term change.’ Q3

This speaks to a fear of ghettoization among young people and the need for community spaces to be available to them without prejudice. Often noted among young people is the lack of community space outside of sporting clubs.

- Clare PPN recommends consultation with the young people of Clare when planning recreational space for the community as a whole
- Clare PPN recommends that Clare County Council leads the way in providing traineeships within the Local Authority aimed at early school leavers.

‘There is a need for young people to feel secure and central to this is a place to call home – a home where they can be assured of a bed and even when there are difficulties a place that is theirs. The lack of a place to call home has a crippling impact on young people. There have been attempts to provide solutions in the form of Housing Hubs – shared accommodation, temporary accommodation and of course direct provision. None of these are homes. There needs to be a return to Government and Local Government building homes for people to live in. This is of critical importance. A basic but essential need to be prioritised.’ Q6

- Clare PPN asks that the voice of young people experiencing homelessness is heard when finalising Volume Eight – Clare Housing Strategy.

The report highlighted rural transport as a barrier for young people in terms of employment, education and leisure and said that more job opportunities were needed locally and regionally. Clare PPN has already made recommendations in these areas, specifically around universally accessible transport and traineeships in both the Local Authority and green energy technology.

Chapter Eighteen – Design and Placemaking

Article 28 of the United Nations Convention in the Rights of Persons with Disabilities (UNCRPD) titled *‘Adequate standard of living and social protection’* calls on signees *‘to ensure equal access by persons with disabilities to clean water services, and to ensure access to appropriate and affordable services, devices and other assistance for disability-related needs’*

This relates not only to housing and medical care but also community facilities that facilitate full participation of people with disabilities. One important infrastructural innovation, currently under public consultation and that has been very successful in the United Kingdom is ‘Changing Places’. In Ireland there are only 15 Changing Places compared to 1,500 in the United Kingdom, (40 in Northern Ireland). Clare PPN disability member groups feel that the recent redevelopment of toilet facilities in Tim Smyth Park in Ennis was a missed opportunity in this regard.

- Clare PPN recommends that Clare County Council makes a concerted effort to install a Changing Places facility in the largest urban area in each municipal district (Ennis, Shannon, Kilrush and Killaloe) as a minimum.

Thank you for taking the time to consider this submission and the Secretariat of Clare PPN welcome any queries in relation to it.

Warm Regards,

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on behalf of Clare PPN Social Inclusion College

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