



SUBMISSION TO CLARE COUNTY COUNCIL in respect of Clare's Local Authority Climate Action Plan

Clare Public Participation Network – Environmental College
& Clare Environmental Network

23rd June 2023

Abstract

Submission for consideration in response to the public consultation on
Clare County Council's Local Authority Climate Action Plan (LACAP)

CLARE PUBLIC PARTICIPATION NETWORK

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Clare PPN is a network of 394 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. Clare PPN’s website is www.clareppn.ie and we are on Twitter @clare_ppn and facebook.com/clareppn/

Clare Environmental Network (CEN) 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.

INTRODUCTION

We welcome this opportunity to provide input towards the draft of Clare’s Local Authority Climate Action Plan (LACAP). This submission draws from ongoing consultation between members of Clare PPN’s Environmental College and Clare Environmental Network (CEN).

The urgent need for radical and transformative action to avert a global catastrophe is rapidly becoming more apparent. In a new study, published this week (22nd June, 2023) in the ‘Nature Sustainability’ journal, scientists warn that more than a fifth of ecosystems worldwide, including the Amazon rainforest, are at risk of a catastrophic breakdown within a human lifetime.¹

This study bears out the warnings made last year in the Intergovernmental Panel on Climate Change’s (IPCC) Sixth Assessment report, that 3.3–3.6 billion people – or half of the world’s people – are “highly vulnerable” to serious impacts from the climate crisis; a billion people in coastal areas face inundation; mass die-offs of species including trees and coral have already begun; and close to a tenth of the world’s farmland is set to become unsuitable for agriculture.

The authors make clear that climate change is already causing dangerous and widespread disruption to human well-being and the health of the planet and that exceeding 1.5 degrees Celsius of warming over pre-industrial levels will result in

1 <https://www.nature.com/articles/s41893-023-01157-x>

unavoidable extreme impacts. The report shortens the timelines relating to the action required to prevent the most catastrophic climate breakdown.²

The IPCC report reiterates the need for decisive, systemic climate action from national and local governments, concluding that: “The cumulative scientific evidence is unequivocal: Climate change is a threat to human well-being and planetary health. Any further delay in concerted anticipatory global action on adaptation and mitigation will miss a brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all.”³

Clare LACAP

Here in Clare, the County Council’s ‘Summary Report’, which aims to open stakeholder dialogue on the development of the LACAP, sets out the Council’s “leadership and influencing role to drive climate action amongst the local community” (page 6), while on page 7, under the heading ‘Vision’, it states:

“The most effective way of reaching our goals is to make sure ‘everyone rows in the same direction’, and this destination is summarised in a unified vision of the future that supports ambitious climate action. Given the wide role that Clare County Council has, it is important to have a unifying vision which reflects a desired and shared perspective of the future in a climate resilient and climate neutral society.”⁴

While Clare PPN/CEN welcomes these aspirations, we are of the view that Clare County Council is – in certain respects – effectively rowing in the opposite direction to “ambitious climate action” or to a “climate neutral society”. For example, the Clare County Development Plan (CDP) 2023-2029 commits to building an enormous data centre near Ennis that includes what is effectively a large gas-burning power station and which would result in a significant rise in Ireland’s greenhouse gas emissions.

Similarly, an objective contained in the CDP 2023-2029 is to facilitate the “expansion of the Natural Gas infrastructure throughout the County”, which also runs counter to the goals and objectives of climate action and decarbonisation.

As Clare County Council embarks on its programme to encourage climate action by local communities, it should begin by dropping its plans to build or facilitate a data centre and by cancelling its commitment to facilitate more gas infrastructure.

There are many other actions the Council can take, both in terms of its own organisation and in terms of community climate action it can promote and facilitate. This submission recommends numerous such actions.

2 <https://www.ipcc.ch/report/ar6/wg2/>

3 <https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/>

4 <https://yoursay.clarecoco.ie/2357/widgets/48243/documents/595>

This submission is informed by the following policy or strategy documents:

- Clare County Development Plan 2023-2029
- Regional Spatial & Economic Strategy for the Southern Region
- National Planning Framework
- Project Ireland 2040
- National Development Plan 2018-2027
- Clare Co Council LECP 2016-2021
- Clare Co Council Climate Adaptation Strategy

GENERAL SUBMISSION

Clare PPN/CEN recommends the following general actions as part of the Clare LACAP:

- a) Clare Co Council, in line with national government, should declare and use the terms ‘Climate and Biodiversity Emergencies’. Our environmental member groups and Clare Environmental Network are concerned that Clare Co Council policy documents do not adequately reflect the seriousness of the situation we are in. Clare PPN calls on Clare County Council to declare a climate and biodiversity emergency and to use that wording in this LACAP.
- b) The establishment of a Climate Change and Biodiversity Strategic Policy Committee which will work to help inform strategy and to advise on environmental sustainability issues in general as well as informing the development and updating of the Local Authority Climate Action Plan.

Ennis Data Centre

Clare PPN/CEN notes that for the past several years, the proposed data centre in Ennis has been heavily promoted and advocated for by Clare County Council, which took the unusual step of amending the Clare County Development Plan 2017-2022 to incorporate the proposed facility and rezone the necessary lands. In the interim it has become clear that for reasons of carbon emissions, energy security and sustainable local development that a project of the size and scale proposed which is reliant on fossil fuels is contrary to the interests and wellbeing of the people of Clare.

The proposal is utterly incompatible with the goal outlined in the Clare LACAP of: “Influencing sectors, business, communities, and individuals in the delivery of local climate action.” It is also incompatible with the Clare CDP 2023-2029, the Clare Local Economic and Community Plan and the Clare Renewable Energy Strategy, concerning the need to reduce energy use and greenhouse gas emissions.

The proposed data centre would:

- significantly increase Ireland’s greenhouse gas emissions, both through the burning of fossil gas on site to generate electricity and through the huge consumption of electricity from the national grid;
- increase the risk of electricity blackouts nationally due to this extra strain on the grid;
- increase Ireland’s reliance on imported gas, at a time when global events clearly demonstrate an urgent need to reduce our dependence on imported fossil fuels;
- divert huge volumes of treated water away from domestic and other users in Clare.

According to details set out in the planning application for the facility, which was lodged with Clare County Council in July 2021, it would involve:

- an electricity load of 200MW, the equivalent electricity consumption of all the homes in Clare, Limerick and Kerry combined;
- huge gas turbines generating 120MW of electricity - effectively a large fossil fuel-burning power station within the data centre;
- a draw of 80MW of electricity from the national grid;
- the consumption of up to 1,000,000 litres of treated water per day in hot weather.⁵

In September 2021, the Council responded to the developer, with a Request for Further Information (RFI). This RFI, among other suggestions, noted that excess heat from the proposal “may provide an opportunity for the provision of a district heating system” for the local area. While this is a useful suggestion, and while it is important to avail of any opportunity to use excess heat from new industrial facilities for district heating, this modification to the proposal would represent only a relatively minor tweaking of the overall climate impact of this data centre.

The Council’s response did not challenge the fundamental problems posed by the proposed data centre, namely that it will, if built, result in a dramatic increase in the burning of fossil fuels and an increase in Ireland’s greenhouse gas emissions;

⁵ <https://www.eplanning.ie/ClareCC/AppFileRefDetails/21757/0>

cause significant air pollution in the local area; and will consume vast quantities of treated water - an increasingly scarce resource.

Clare PPN/CEN recommend that Clare's LACAP:

- - include a commitment not to build, promote or support data centres in Co Clare
- - stipulate that no new industrial developments that increase the burning of fossil fuels be permitted in Clare;
- - stipulate that no developments be allowed that will result in a significant increase in consumption of electricity/fossil fuels.

Fossil fuel infrastructure

Climate scientists, including the IPCC, have warned that humanity must rapidly shift away from burning fossil fuels - including fossil gas - in order to avert catastrophic climate breakdown.⁶

Clare PPN/CEN notes that the new Clare CDP 2023-2029 includes an objective "to facilitate the delivery and expansion of the Natural Gas infrastructure throughout the County for both domestic and business/industry use..."

This objective is counter-productive to the requirement to reduce fossil fuel burning and runs counter to the objectives set out in various Council policy documents to facilitate the transition to a low-carbon economy.

Clare PPN/CEN recommend:

- the inclusion in the Clare LACAP of a commitment to ban all new investment in fossil fuels or in fossil fuel infrastructure.

Just Transition

The concept of a Just Transition, which was included in Ireland's Climate Law enacted in 2021, refers to ensuring that the transition to a low-carbon society and economy is inclusive, protects jobs and communities and delivers new opportunities for all. Just Transition is an essential part of building and sustaining public support for vital climate action. The radical changes required as part of climate action must take into account fairness for all people and put this at the heart of all decisions.

- Clare PPN/CEN recommend that the Clare LACAP should include:
 - A commitment to ensure a Just Transition for workers and communities across Clare;

⁶ <https://www.ipcc.ch/report/ar6/wg2/>

- A commitment to regular, comprehensive and meaningful consultations with people from all walks of life in Clare to listen to ideas and to people's varied needs, and to make democratic decisions for every community within the county.
- A commitment regarding Moneypoint power station to work with all resources available to Clare Co Council for a Just Transition for those who work there.

Clare PPN/CEN further note that Clare residents are particularly affected by measures to reduce carbon emissions in comparison to other counties – the dependency on cars or vans for transport is more than 10% higher than the national average and the dependency on oil-fired central heating almost 20% higher than average. To facilitate a just transition these factors will need to be taken into account. Carbon taxes and increasing prices for oil and gas are likely to exacerbate these existing inequalities in the county, and measures to mitigate the effects of this, including through retrofitting and provision of public transport, are immediately necessary.

Mining

Clare PPN/CEN are very concerned at growing pressure in recent years to facilitate and promote mining activity in Co Clare. The push for more mining across Ireland is partly due to a demand for metals and mineral resulting from the quest to decarbonise society and to develop the 'green economy'. However, mining for precious metals is among the most destructive industries in the world and – from a climate perspective – mining is highly fossil fuel intensive and is a significant emitter of greenhouse gases.

As well as its climate impact, mining displaces communities, contaminates drinking water, scars the landscape, has a negative impact on small-scale farming, fishing and eco-tourism and often poses a threat to existing employment in the area. Mining is associated with the largest amount of toxic waste produced by any industry, which can cause severe ecological damage and pose threats to surrounding communities. Chemicals used include mercury and cyanide.

- Clare PPN/CEN recommend:
 - the inclusion in the Clare LACAP of a commitment not to permit mining in Co Clare.

Retrofitting

Reducing energy consumption through energy efficiency is a key element of effective climate action, as outlined, for example, in the Climate Action Plan 2021.⁷ Retrofitting Clare's older housing stock is a highly effective way of improving energy

⁷ <https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/>

efficiency and reducing the county's greenhouse gas emissions. Furthermore, providing grants to make retrofitting accessible to those on lower incomes is an essential element of a just transition. The Regional Spatial & Economic Strategy (RSES) for the Southern Regional Assembly (RPO 160 Future proofing and Retrofitting) strongly supports the retrofitting or improvement in energy efficiency of all residential, public, industrial and agricultural building stock.

- Clare PPN/CEN recommend that the Clare LACAP includes:
 - Measurable targets for retrofitting work on Clare County Council's own buildings.
 - A commitment to seek any available funding to make retrofitting of houses accessible to those at lower income levels. Grant schemes currently available are only relevant if a person has sufficient wealth or access to credit to avail of them in the first place. Clare PPN/CEN considers that as part of the Local Authority's ambitions to boost employment, to cut carbon emissions and improve air quality that a fully subsidised Local Authority-led scheme for retrofitting of houses could be viable.

Rights of Nature

Protection of biodiversity and of Clare's ecological health needs to be a priority alongside reducing carbon emissions. In the race to decarbonise, there is a danger of causing further and accelerated destruction of the natural world in the name of addressing climate change.

Clare PPN's Environmental College has previously proposed that Clare County Council's actions be guided by a 'Rights of Nature' (RoN) approach. This approach proposes a way to rethink our relationship with nature, in which humans are connected to and dependent on the natural environment and in which both humans and nature have equal and intrinsic rights to exist, regenerate, evolve and thrive.

The RoN approach aims to provide guarantees for the protection of life on earth through our current legal and political system. Taking a RoN approach will help to shift from the Council's current extractive approach to our environment to more of a custodianship approach that can create a circular, sustainable, regenerative economy and society.

- Clare PPN/CEN recommend:
 - that a Rights of Nature approach is enshrined in Clare's LACAP and that actions in the LACAP are informed by this approach.

Economic growth vs degrowth

Many of Clare PPN's member groups and CEN members advocate the economic philosophy of 'degrowth'. According to the degrowth principles, as outlined in a 2022 article in the scientific journal 'Nature', wealthy countries can create prosperity while using fewer materials and energy if they abandon economic growth as an objective:

“Wealthy economies should abandon growth of gross domestic product (GDP) as a goal, scale down destructive and unnecessary forms of production to reduce energy and material use, and focus economic activity around securing human needs and well-being. This approach, which has gained traction in recent years, can enable rapid decarbonization and stop ecological breakdown while improving social outcomes.”⁸

The current economic model of neoliberal capitalism depends on perpetual economic growth, which is not compatible with a planet of finite resources. Clare PPN/CEN recommends that Clare Co Council, when drafting policy and planning climate action, considers the principles of degrowth, which advocates using less to reverse the trend of rising emissions.

ENERGY

A. Clare PPN/CEN note the reduced use of Moneypoint power station in 2019 and its contribution to reducing overall carbon emissions. Clare PPN/CEN note the following from the Southern Assembly RSES: “the conversion of Moneypoint electricity station by 2025 from burning fossil fuels as part of the transition to a low-carbon and climate resilient society. The RSES recognises the importance of Moneypoint as producer of 25% of national energy and its potential as a deep water port.” We call for Clare LACAP to note this commitment to ending fossil fuel burning at Moneypoint and to commit to working with all resources available to Clare Co Council for a ‘just transition’ for those who work there.

B. Clare PPN/CEN recommend that the Clare LACAP includes a commitment that there will be no new investment in fossil fuels or in fossil fuel infrastructure.

C. Clare PPN/CEN recommend that the Clare LACAP includes commitments to collaborate with industry, construction and education providers to develop apprenticeship schemes in the County which would aim at the ‘green economy’. These could include apprenticeship programmes targeted at ensuring Clare has an available workforce skilled in retrofitting, solar panel installation, wetland sewage systems and willow production. Clare PPN/CEN would like to see such apprenticeship schemes targeted at communities where there is underemployment.

D. Clare PPN/CEN recommends that the Clare LACAP should include goals and a commitment to support community micro-generation of energy and to support and resource communities in skills needed to maintain community ownership and management of these energy projects.

⁸ <https://www.nature.com/articles/d41586-022-04412-x>

E. Clare PPN/CEN recommend that Clare LACAP detail a commitment to the use of substations and decentralised energy generation to avoid energy loss during or as a result of transport.

F. Clare PPN/CEN note that the Southern Regional Assembly RSES (RPO 160 future proofing and retrofitting) strongly supports the retrofitting or improvement in energy efficiency of all residential, public, industrial, and agricultural building stock. Clare PPN/CEN recommend that Clare LACAP includes measurable targets for such work on the Local Authority's own buildings and a commitment to seek any available funding to make retrofitting of houses accessible to those at lower income levels. Grant schemes currently available are only relevant if a person has sufficient wealth or access to credit to avail of them in the first place. Clare PPN/CEN considers that as part of the Council's ambitions to boost employment, to cut carbon emissions and improve air quality that a fully subsidised, Local Authority-led scheme for retrofitting of houses could be viable.

G. Clare PPN/CEN note the considerable issues with the release of methane from agricultural practices in Ireland, including in Clare, and recommend that the Clare LACAP include a commitment to research, support and pilot projects in anaerobic digestion in the short term. These projects should be done with open, participative community consultation and on brownfield sites where environmental impact will be lowest.

H. Clare PPN/ CEN note considerable discontent amongst its membership at the manner in which Wind Energy projects have been rolled out in Clare. We recommend that the Clare LACAP would require all such private operators or State-led projects in wind, offshore wind and wave, solar energy, anaerobic or biomass energy production to consult widely with communities and to demonstrate how they have done so and how they have addressed concerns effectively in advance of any permission being granted.

I. Clare PPN/CEN consider that there is a necessity for more focus on educational initiatives around energy generation and usage in the county and would like to see actions included in the Clare LACAP around information-sharing events and roadshows on providing for the future energy needs of the county. We consider that there is huge opportunity and necessity for public engagement, information sharing, consultation and participatory decision-making.

TRAVEL, TRANSPORT AND HOUSING

A crucial element of climate action is the provision of public transport that works for people. This is especially true in a predominantly rural county such as Clare.

A. The Clare LACAP should include a commitment to set up a task force on public transport in the county with the aim of ensuring all existing services work together in co-ordinated schedules and include more and more regular stops between key regional points such as Shannon Airport, Galway and Limerick, and that public

transport, cycling and walking become viable options for the majority of the population in the county. This task force should be established in the short term and have community representation as well as representation from transport authorities and local providers.

B. Clare PPN/CEN note that the Northern Distributor Road has been prioritised in, for example, the Regional Spatial & Economic Strategy. From an environmental perspective this project does not reflect good, future-proofed planning as it will serve to increase car dependency and act against the principles of compact urban growth. Clare PPN/CEN further note that the development of an urban rail system in Limerick, with stops at Moyross and potentially at UL, has been discussed in the context of the Limerick Shannon Metropolitan Area Transport Strategy and that, combined with further stops in Clare and a direct connection to a new rail spur to Shannon, this would be a preferable option.

C. Clare PPN/CEN recommends that the Clare LACAP includes a commitment to give serious consideration to the construction of a rail spur to Shannon Town and Airport/Industrial Estate from the Galway-Limerick Line. This would be a crucial piece of infrastructure and would assist with the development of the region, the desirability of Shannon as a place to work, live and commute to.

D. Clare PPN/CEN suggest that the Clare LACAP should set annual targets to increase passenger load per vehicle and to decrease the total number of vehicles on the road through a combination of public transport, car sharing, electric vehicles and autonomous vehicles. They recommend that community car schemes such as Go Car are trialled in urban areas of Clare.

E. While Clare PPN/CEN recognise that efficient, effective public transport and compact growth should be prioritised due to their benefits for carbon emissions, air quality and lifestyle, we also call on the Clare LACAP to make extensive provision for electric car and public transport vehicle charging stations on the existing road networks in the county.

F. The Clare LACAP should commit to all new public transport offerings using zero or low emission vehicles with universal accessibility for those with disabilities.

G. School bus services should be expanded and subsidised to ensure they become the dominant form of motorised transport to and from schools where active travel methods are not feasible.

H. The Clare LACAP should include measures to pedestrianise town centres, with exceptions being made for public transport vehicles which minimise the use of private cars. Clare PPN/CEN note that all pedestrianisation projects should be planned in consultation with disabled people and those with reduced mobility to ensure access for these groups is preserved and, where possible, enhanced. Clare PPN/CEN note that electric, low-powered 'micro cars' are used safely in cycle lanes in many European cities and that these should be an option for transport within urban areas for people with reduced mobility.

I. Clare LACAP should include an action and a timeline to begin a process of upgrading or providing footpaths on all roads, with provision both for walking and for people with disabilities to access them.

J. Clare LACAP should include commitments to establish park-and-ride facilities in commuter settlements in Clare with links to public transport.

K. Clare LACAP should ensure that actions regarding the provisions of specific bicycle/walking/horse transport lanes, separate from roads, are included in any long-term transport strategy. It is not necessary nor always preferable for alternative forms of transport to follow the same routes as those developed for motor vehicles.

L. Clare LACAP should include commitments to plan for, promote and support safe cycling in the county, including by resourcing and supporting bicycle rejuvenation and loan schemes.

M. The Clare LACAP should include measures to promote local and micro food production, including mandating green areas for drainage and possible food production in house plans, encouraging and supporting community gardens in public spaces and including provision for them in all new housing estate applications.

N. In respect to housing, Clare PPN/CEN recommend that Clare LACAP commits to updating its planning processes to ensure that all new buildings are required to include provisions for ensuring water harvesting and grey water systems in housing plans. We call on Clare Co Council to promote and extend the opportunities available for retrofitting houses for energy efficiency. Clare PPN notes there are further opportunities in this field for the establishment of apprenticeships in the area of retrofitting and solar panel fitting to create sustainable work and livelihoods for people in Clare and recommend that these opportunities are investigated with an opportunity for LCETB, LIT, LEO etc to lead in training and skills in such areas.

O. Clare PPN/CEN recommend that Clare LACAP include clean air targets and support measures to reduce and then cease the use of fossil/carbon-emitting fuels in urban housing estates and individual houses, while protecting residents from fuel poverty.

AIR POLLUTION AND WASTE

A. As noted under 'Energy', Clare PPN/CEN call on the Local Authority to ensure Clare LACAP includes a commitment to ambitious schemes to ensure retrofitting of public, industrial and residential buildings.

B. Clare LACAP should seek to expand the existing 'Bike to Work' schemes to include electric bicycles and other transport technologies that would reduce the use of privately owned cars. While this is a national programme, our group members

saw opportunities for this to be piloted at a local level, particularly in line with plans for extensive greenways and cycleways in the county.

C. Clare PPN/CEN would like to see Clare LACAP make significant commitments in terms of waste reduction and management. These could include the Council taking waste services back into direct operation.

D. Clare PPN/CEN recommends that the Council undertake a county-wide programme of well-managed compost bins in public areas. This programme should include promotion and training in their use and management. Clare Co Council has the ability to lead the way in this regard and such a project would have a variety of benefits in minimising waste and methane emissions, in supplying organic fertiliser for council owned landscapes and in reducing the costs of waste disposal for householders. It would also provide employment opportunities in the training, management and sale of compost, should it be rolled out successfully.

E. It is recommended that as part of a waste management programme under Clare LACAP that a Clare-specific report on “how waste is currently being disposed of” by private operators and by the authority itself should be commissioned. This report will demonstrate whether opportunities exist to repurpose, recycle and minimise waste in County Clare and will establish whether Clare Co Council or other operators can create the conditions for this to happen.

F. Clare LACAP should commit to the publication in January each year of a schedule of collections/ collection days for:

- Large household Items
- Paint/Chemicals/Hazardous/Waste
- Electrical Goods

The needs of communities living in poverty and without transport should be taken into account in such plans.

G. Clare PPN/CEN recommend that Clare LACAP include a commitment to roll out ‘Zero Waste Strategies’ in the County and to seek buy in from State bodies, industry, farmers and retail outlets. As part of the commitment to Zero Waste, Clare Co Council could:

- Pilot an award scheme for Clare’s first zero-waste community.
- Begin to pilot and implement ‘Community Responsibility Plans’ for refuse with communities being challenged and supported to produce zero waste.
- Commit Clare Co Council to the installation of public drinking water fountains/ bottle filling stations at convenient locations in all urban settlements and ensure that they are installed in all local authority buildings.
- Include a commitment by Clare Co Council to pilot compost toilets in national park, forest and other outdoor amenity settings and lead by

example. Work to ensure that planning permission is available for use of compost toilets in suitable privately-owned premises or homes.

- Clare Co Council itself as part of zero waste could commit (post-Covid-19) to using no plastic bottles/disposable coffee cups or food implements at any Council organised event or in its day-to-day work.

H. Clare PPN and CEN both noted that as well as the health promotional aspects associated with breastfeeding babies, that it is sustainable, reduces dairy consumption and minimises energy use. Organisations who support women to breastfeed should be supported by Clare Co Council. Clare PPN/CEN recognise that breastfeeding is not possible or not the choice for some mothers and this should be respected. We suggest that Clare Co Council should, in the Clare LACAP, declare itself and all of its offices to be breastfeeding friendly zones and lead by example.

COMMUNITY RESILIENCE, HEALTH AND WELLBEING, AWARENESS RAISING AND EDUCATION

A. Clare PPN/CEN note that Clare LACAP should commit Clare Co Council to establishing Community Emergency plans for each settlement area in the county. Following the Covid-19 response, Clare PPN/CEN suggest that the LA should lead on drawing up such plans. These plans would include named volunteers in each area who have agreed to take responsibility for certain aspects of the situation and should include the provision of local access to emergency, food, water and medical supplies, local access to shelter in a community or council owned building in the event that frontline services are unable to reach people.

Clare LACAP should include a commitment to plan, resource and train people for this purpose immediately, particularly in areas deemed to be at severe risk of flooding or other isolating events which may prevent access. It is envisaged that these actions should make use of existing community groups and structures and text alert schemes/WhatsApp groups. The establishment of these groups and structures would provide an opportunity for training in emergency responses, first aid and sustainable practices to be rolled out simultaneously, and Clare PPN/CEN consider this a valuable opportunity which should be taken up by the local authority.

Clare PPN/CEN also call for Clare LACAP to include an action, with the consent of those involved, to identify community members who may be more vulnerable to such situations, including Traveller community members in temporary dwellings, holiday makers in mobile homes, elderly or isolated communities and people with disabilities, and - with their permission - to organise the addition of their names, addresses and contact numbers to locally held emergency response plans. These lists should be updated regularly and be restricted for emergency use only.

B. CEN/Clare PPN note that one of the impacts of the climate crisis is an increase in migration. It is extremely likely that internal displacement will be a feature of the Climate Emergency within County Clare, and Clare LACAP should include provisions to predict, monitor and plan for this.

Secondly, the Climate Emergency has already increased migration from inhospitable parts of our planet: Clare Co Council should include provisions for the speedy integration and support for migrants into County Clare. It is in the interests of their human rights, as well as to the benefit of the whole community and its resilience and cohesion that these methods of accommodating migrants are changed and people are not placed in institutional settings where they are excluded from proper integration with the community and the community does not have the benefits of their skills and capacity.

C. Clare LACAP should include commitments and actions to support communities with regard to rainwater harvesting and micro energy generation with a view to increasing community resilience.

D. Clare LACAP should include an explicit recognition that young people are at the heart of campaigning for sustainable lifestyles and climate action, and a commitment to ensure that it establishes systems whereby their views, expertise and leadership are taken into account in all actions. Clare PPN suggests that any new climate-related committee within Clare County Council should have a portion of its seats ring-fenced for secondary school-aged people or that it be required to set up processes to consult with them directly. This could be a pilot project and it would help combat cynicism and put young people at the heart of decision-making.

E. Clare PPN and CEN recommend that Clare LACAP includes measures to promote the climate crisis as a mainstream issue and would like to see Clare Co Council's media personnel, and its staff working on climate, environment and heritage fully supported in publicising these issues through local media, the Council website and social media.

F. Clare PPN and CEN recommend that Clare LACAP includes a commitment to establishing a climate award scheme as part of its awareness-raising toolkit, where groups who have innovated or demonstrated exceptional sustainable practice can be nominated for an award, thereby creating publicity for the practices as well as encouragement for groups.

WATER MANAGEMENT, FLOODING AND MARINE

A. Clare PPN/CEN recommend that the Clare LACAP includes actions designed to restore bogs, peatlands and wetlands to their natural functions - flood water storage and as carbon sinks. This in particular should be taken into account when planning for renewable energy infrastructure and forestry. What may appear to be 'non-productive land' may be providing a vital function.

B. In respect of housing, Clare PPN/CEN recommend that Clare LACAP includes an action for the planning department to require plans for houses to include green spaces that will absorb rainfall and that the use of patios and paved areas is minimised, except where necessary for safety and access.

C. Clare LACAP should include a commitment to work closely with organisations such as Teagasc in order to ensure that training and support for changed practices in farming are available. Clare PPN also notes the existence of the organisation Talamh Beo which may be available to provide training or public seminars in respect of food sovereignty and sustainable food producing practices.

LAND USE, SOIL HEALTH, FOOD SECURITY & PRODUCTION

A. Clare LACAP should commit to encouraging diversification of farming towards sustainable practices which can assist farmers and rural communities in achieving good livelihoods in Clare - supports, training, and grant-aiding sustainable agriculture start-ups or change of use will be necessary.

B. Clare LACAP should consider food security from the following perspectives - (i) local access to food in emergency situations and (ii) ensuring that diverse, local, sustainably farmed food becomes a key aim of policy in the area of farming and land use, with less invasive and intensive models being piloted to allow for maximum recovery of soil. Our attendees considered that Clare LACAP should include commitments to working towards food independence and that an evaluation of the nutrition requirements of the current and projected population and the food production capacity of the county would be the most useful starting point for such initiatives.

C. Clare PPN/CEN consider that Clare LACAP should include commitments to raise awareness and provide education in the County regarding regenerative forms of agriculture such as agro-forestry and holistic livestock management (zero carbon beef) and investigate actions such as the establishment of a mobile abattoir for Clare which could visit farms, to reduce travel and trauma and stress hormones in the meat and to ensure meat is available for local consumption. This might also help farmers by providing another option in respect to the monopoly held by the meat factories on beef prices.

D. Clare LACAP should include clear commitments that Clare Co Council will engage constructively in consultations with farmers and their organisations including Talamh Beo, the IFA, Macra and the new Beef Plan Movement regarding the need for changes to farming practices around beef production, dairy production, hedgerow and habitat protection, waste disposal and pesticide use. Clare PPN/CEN recognise that the farming community will be vital in ensuring that

Ireland and Clare are resilient to Climate and Biodiversity Emergency and recommend that processes are established to ensure that respectful communication can happen. Clare PPN is itself taking steps in this regard.

E. Clare LACAP could include actions to reinvigorate the reputation of County Clare as a ‘Slow Food’ production region. This would help to promote sustainable farming methods, lifestyles and attract high value tourism to the region. Community and private enterprises such as Moy Farm, Seedsavers, Wild Foods, Jim Cronin’s Organic Farm and various restaurants, cafes and farmers markets are already engaged in this effort and so committing in Clare LACAP to supporting them through promotion and opportunity would deliver a tangible benefit for all.

F. Clare PPN/CEN understand that agricultural policy is not part of the remit of Clare Co Council, however its responsibility for planning land use and introducing bye-laws mean that Clare Co Council can have significant impacts on practices in the County. Clare PPN/CEN recommend that Clare LACAP should outline a strategy to incentivise farmers and landowners in Clare with regard to allowing wildflowers and weeds to grow and to know the benefits of doing so. As noted elsewhere, this can be part of complementary green economy projects which may assist farmers in securing a diversified and environmentally sustainable livelihood.

G. While promoting silviculture and agroforestry, Clare LACAP should include actions to reduce and remove incentives in Clare for Sitka or monocrop, non-native evergreen species forestry plantations. Clare PPN/CEN recommend that Clare LACAP should steer any forestry policy in the county away from dependence on monocultures such as Sitka Spruce and promote the growth of native, mixed woodland wherever possible. It should recognise the value of bog, wetland and ‘marginal’ or poor quality farming land being important as carbon stores and habitats for biodiversity.

WORK & ECONOMY

A: Clare PPN/CEN note and commend the provision of digital hubs and the proposal to increase the number of these over the coming years. Clare PPN/CEN also note that Clare Co Council has successfully managed to allow home working amongst its staff as well as holding virtual meetings. Clare PPN/CEN would like to see the Clare LACAP include a commitment from the Local Authority that it will encourage staff who can and wish to work remotely to do so. This will reduce emissions from commuting and help to establish a decentralised workforce, as well as with rural development and the dispersal of economic activity in the county. Clare PPN/CEN note the significance of the availability of high-speed broadband to ensure that the option of remote, home or decentralised work practices remain viable. Clare PPN/CEN consider that a commitment to ensuring quality access to in-home broadband be a priority in the Clare LACAP.

B: Clare PPN considers that Clare Co Council should expand its apprenticeship programmes as widely as is possible. Given the range of the Local Authorities activities it has the capacity to provide apprenticeships within a variety of trades and in so doing would assist the skills base and sustainable employment pathways in the county.

CONCLUSION

In light of the dire warnings from climate scientists about the implications for life on earth of exceeding 1.5 degrees of warming compared to pre-industrial levels, it is vital that Clare Council does everything possible to reduce greenhouse gas emissions and to help communities mitigate, prepare for and adapt to the effects of climate change.

Clare PPN/CEN welcome this opportunity to make submissions in respect of the Draft Clare LACAP 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.

We wish to state in conclusion our commitment to working collaboratively towards the goal of climate action that is both effective and fair and that seeks to include and consider every member of the population in Clare and the future generations to come. Member groups of Clare PPN's Environmental College and of Clare Environmental Network would be happy to meet with Clare Co Council to discuss any aspect of this submission.

Any queries in relation to this submission can be directed to Sarah Clancy, Clare PPN Co-ordinator, for the attention of the Secretariat of Clare PPN:

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