



Clare Green Party

Submission - Draft Clare County Development Plan 2023-2029

The Clare Green Party welcomes the commitment to climate control measures in Goal I of the draft Clare County Development Plan 2023-2029. We support the objective to meet the aims of Climate Action Plan 2021, and the commitment to renewable energy. We welcome the development of Ennis as a 10 minute town and as Ireland's first Climate Adaptive Town.

Targets are specified for some of the goals and objectives in the draft Plan, as required by Section 15 of Planning Act. In some instances, these targets are extremely ambitious, such as with respect to renewable energy. While ambition is welcomed, we encourage that all targets are realistic and that measures to attain them are identified.

There are a number of goals and objectives where targets have not been set, or are not specific. We strongly encourage targets that can be readily monitored, particularly for those actions where the council has direct control. These include travel and mobility, public realm and local authority housing. Consequently, our submission concentrates on these aspects and the climate/environment related issues as follows:

- 1. Travel and Mobility**
- 2. Public realm including community/culture education and recreation**
- 3. Housing**
- 4. Ennis Municipal Area / Ennis 2040**
- 5. Clare Renewable Energy Strategy**
- 6. Air Quality**
- 7. Light Pollution**

Successful attainment of targets in these areas will help to achieve many of the key goals, including climate resilience, strong economic growth, quality of life, community strengthening – all contributing to making County Clare a more vibrant and attractive place to live and visit.

1. Travel and Mobility

Very few specific projects or targets are identified in Volumes 1, 3, 5 and 10 in relation to Travel and Mobility contrary to the Guidelines. Specific actions and targets to integrate in the Plan are proposed below:

General

- Specify desired modal shift in transport (Strategic Environmental Objective CC1 & CC2)
- Specify target for reduction in number of two car households in Clare

- Commit to providing clear guidelines on how to effect the behavioural change to meet objective CDP 2.1(c) and to enable people to make the necessary changes. For example: awareness campaigns in schools, public notices on social media, information evenings, sports clubs etc.

Within urban areas

- Specify target length of unbroken pathway / cycleway between all places of interest (schools, town centre etc.) and main residential areas. Where possible, specify route.
- Specify number of permeability access points to be created between existing housing areas and other developments/shopping areas/schools/places of interest. Where possible, specify locations.
- Provide safe pedestrian crossing and/or traffic lights at all roundabouts in urban areas.
- Assign priority for pedestrians at all exits from housing developments, public buildings and retail areas
- Specify maximum distance between safe crossing points on major roads/streets.
- Give priority at traffic lights to pedestrians, with maximum of 30 seconds wait time
- Reduce speed limit in built up and residential areas to 30 km/hour
- Provide electric vehicle charging facilities in all car parks, public buildings and recreational areas
- Specify number and indicative locations of short term car rental park places to be established in town centre and residential locations

Additional targets that apply to Ennis

- Make proposed shuttle bus free and frequent and establish a target usage level
- Specify number / location of park and stride infrastructure
- In Ennis, the medieval structure is well designed for pedestrian access and the centre already has many key features of a 10 minute town. Focus active travel improvements on access to the town centre and on cross connectivity between suburban areas.

Rural areas / interconnectivity

- Ensure West Clare Railway Greenway also provides links to residential areas to maximise use for commuting as well as leisure (obgV3(a)13)
- Identify quiet routes between places of interest using back roads as Active Travel Routes. Develop these as routes for cycling/walking with speed limits, resident only access etc.
- In the west of county, combine Active Travel Routes with the WCR Greenway to provide a number of loops and interconnections and create a comprehensive network for commuting and leisure (e.g. Miltown to Ennis, Kilrush to Ennis, Lissycasey to Inagh)
- Develop and promote rural public transport / local link and establish mix of alternatives such as shared taxi/car share/short duration car hire.
- Implement measures to increase usage of local link buses and establish a target usage level.

2. Public realm including community/culture education and recreation/biodiversity

We support the aims of Goal X and related goals to enhance quality of life while having regard to environmental responsibilities and propose the following specific targets:

- Specify target number of projects /successful outcomes for green infrastructure projects (CDP 15.30), including increased play areas, green areas etc.
- Provide funding to local resident groups for rewilding in housing developments
- Ensure continuous safe pedestrian/cycling access from residential areas to main recreational areas such as Ballybeg Woods and Lees Road. In particular, prioritise pedestrian/cycling access from Gort Road which is extremely dangerous at Droichead na Gabhar
- Utilise Rocky Road more fully as a public amenity and pedestrian/cycling route
- Ensure that all pedestrian/cycling routes are as pleasant as possible to maximise use. This often means moving away from main roads
- Provide meeting places for community groups, with indicative target number and locations
- Assign locations in specified urban areas for allotments and/or community gardens, potentially following the successful model in Shannon
- Continue to build on the Ennis win in Tidy Towns in biodiversity and cease use of herbicides and insecticides by the County Council within the period of the Plan
- Eliminate the use of Round-Up/glyphosate within the Burren National Park (CDP 15.23)

3. Housing

We support the aims of Goals VI, XVI, XVII and welcome the move towards compact growth of towns and villages. We propose the following targets:

- Specify number of unused commercial spaces and derelict buildings in town centre to be brought back into use
- Specify number of thermal upgrades of public authority homes
- Establish target for repurposing pockets of open space within existing residential area (area or number) (CDP5.16)

4. Ennis Municipal Area / Ennis 2040

Volume 3(a) refers to transformational sites (TS) identified in the Ennis 2040 plan. Some specific comments are as follow:

TS9, proposed data centre. Volume 3(a) section 2.14 specifies elements that any development proposal must include. Although 14 elements are listed, including an Air Quality Impact Assessment, there is no reference to a climate impact assessment. A climate impact assessment should be included as that is likely to be the greatest impact of the proposed development.

The proposed development has an energy requirement of 200MW (80MW from the grid in phase 1 and gas generation of 120MW in phase 2). This is not consistent with Ennis becoming Ireland's first climate adaptive town (Goal V3(a) 14). The renewable element of the grid cannot be considered "available" for the data centre as that is already required for the existing residential and commercial load to meet the existing target. For the data centre to proceed in a climate neutral way, it should be

required to provide additional renewable energy to meet its demand. The projected increase in electric cars and electric home heating is likely to provide sufficient flexible demand to help stabilise the grid.

TS6 – proposed wetlands and enterprise centre

We welcome the proposed access to the extensive wetlands, which offer a wonderful natural amenity within the town and agree that it provides great opportunities for active travel connectivity between the north and south of the town, while mitigating flood risk to the town.

We have some concerns that the proposed enterprise/warehousing area could encroach on the natural amenity and wetlands area. Depending on the location, it could also interfere with the exceptional view of Clare Abbey on the entrance to Ennis. We also note that the proposed enterprise development potentially contradicts Vol 10(b)II goal CC4 – “No loss of wetlands, bogs, fens, marshes, or other carbon sinks across the county through reclamation, infilling or development.”

Consequently we suggest that an existing brownfield sites is preferable for the proposed enterprise/warehouse centre.

TS 3 - the post office field

We recognise that development of the post office field as a nature facility would be an asset to residents and visitors to Ennis. We also recognise that it is an exceptional natural area to have in a town centre and are concerned that increased access could result in degradation. We ask the Council to take every measure possible to maintain the field as it is, with only boardwalks in the main area as proposed, and to protect the wildlife from dogs and visitors.

Proposed transformational project

We propose an additional transformational project to develop a centre of excellence for renewable energy and/or housing upgrades. This would provide skilled employment while also contributing to the county and national goal of reduced greenhouse gas emissions.

5. Clare Renewable Energy Strategy

We welcome the council’s ambitious targets for renewable energy. We note in volume 5 that for the target of 550MW for onshore wind energy by 2022, only 153 MW was installed. The target for 2030 is 550MW. We suggest that the reasons that the previous target was not met should be examined and justification given that the current target is feasible.

We recognise that it is extremely challenging to meet the proposed targets for all renewable energy, (solar, biomass etc.) and encourage the Council to ensure that firm actions are identified in order to bring this to reality.

We note with concern that the proposed data centre would result in an additional demand of 200MW. This is not consistent with the low carbon goals stated throughout the draft Plan.

6. Air quality

Volume 10b(ii)/Section 3.4 on air quality refers to the air quality as “good”, which is to be expected in a rural environment. Nevertheless, the air quality in Ennis is among the worst of urban towns in Ireland. Since the start of the year, the average PM2.5 concentration to mid-March is 23 µg/m³. The annual mean limit is 20 µg/m³.

Exposure to high levels of air pollution are known to impact respiratory and cardiovascular health and environmental exposure to particulate matter is estimated to cause 1300 premature deaths every year in Ireland.

The CDP should acknowledge the elevated levels in Ennis. The Plan should aim to identify the source of the elevated emissions and take appropriate action. As there is limited public knowledge of the poor air quality in Ennis, targeted awareness- raising campaigns highlighting the air quality, its effects, as well as what can be done by all citizens to improve it should also be included. Accelerating the thermal upgrade of housing will result in an associated reduction in pollutant emissions.

There is no information available on the air pollution due to traffic in Ennis. It is recommended that a traffic monitor be installed at a suitable location, such as the Mill Road. If Ennis becomes a 10 minute town as planned, this monitor can provide evidence of the substantial associated improvement in air quality and beneficial impact on health.

A potential goal is to comply with the more stringent WHO criteria, as Dublin has recently set.

7. Light Pollution

Include reference to the impact of light pollution on human health and nature and take actions to reduce it.

The retrofitting of light emitting diode (LED) lighting has brought the necessary advantage of being more energy efficient. However it has increased levels of light pollution due to its high levels of blue rich light or high colour correlated temperatures (CCT). This blue rich light is shown to increase glare, impact on human vision and circadian rhythms and disrupt biodiversity and natural habitats.

CDP policy should restrict the installation of LEDs in residential areas, streets and public spaces to warmer colour LED luminaries (≤ 3000K CCT) to minimise adverse impacts. The council should also consider having regard to the Guidance Note GN01/21 the Reduction of Obtrusive Light – Institute of Light Professionals (2021) [<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>] in the assessment of development proposals. All new public lighting schemes should incorporate ‘trimming and dimming’ controls

The Council should consider the introduction of a Dark Sky policy for rural areas of the county - <https://www.darksky.ie/policy/>

Thank you for the opportunity to provide input.

Submitted by Bridget Ginnity on behalf of Clare Green Party
26/03/22, by email