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Submission to Clare County Council Draft Clare County Development Plan 2022-2029

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CLARE IFA EXECUTIVE

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Thomas Lane
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Employment and Economic Contribution of Agriculture in Clare

The UN estimates that the global population will reach 10 billion by 2050 and that as the population continues to grow, it will become necessary for food production and food accessibility to grow in tandem with that. Food security is a basic human right; having access to at least an adequate amount of nutritious food can in fact be seen as the most basic of all human rights. However, for hundreds of millions of people, this need or right is not being met and, usually, it's for reasons entirely outside of their control. Ireland remains among the best countries in the world in terms of food security at a time when there has been a continued rise in shortages globally.

Food Harvest 2020, Food Wise 2025 and the more recent Farm to Fork Vision for sustainable agricultural production, all outline the value of agricultural and food production to the economy. Our climate gives us a positive edge in efficient grass and crop production. This in turn creates employment in food production and associated services which are a major benefit to local people and the local economy.

According to Sustainable Food System Ireland; the Irish agriculture is dominated by family-owned farms. There are almost 140,000 farms, with an average land holding of 32.5 hectares. Pasture-based farm enterprises dominate, thanks to Ireland's rich green grass growth for 9 to 10 months a year. As a result, Irish output is dominated by dairy and livestock, especially beef. Dairy and beef account for two-thirds of gross agricultural output and similar proportions of agri-food exports. Thanks to the lifting of production quotas in 2015 and Ireland's strong capability in the dairy sector, Ireland is currently one of the world's fastest-growing dairy producers and exporters.

In 2010 the number of farms in Clare stood at 6550 with the average farm size extending to just over 32ha. The agriculture sector in Clare supports thousands of jobs in the rural economy, both directly in food and drink processing, agri-tourism, agri tech, agri-food and also in the wider agri-industry, including input suppliers, agricultural contractors, jobs in auctioneering, transport and engineering and in accountancy, legal, veterinary and other advisory services. A profile from Revenue Data¹ shows that they were 5,847 farmer cases with an income in 2018 farm income of €14,839 each. Figures supplied from the Department of Agriculture show 6,206² applicants under the basic payments scheme in 2018.

According to the 2010 Census of Agriculture, approximately 78 per cent of farms in County Clare are classified as specialist beef production which far exceeds the national average of 56 per cent. A high proportion of these cattle farmers would not be full-time farmers and would engage in off-farm employment. These farmers would contribute directly to local economies through off-farm employment. A Teagasc research paper published in 2018 by *Loughrey et al*³ titled **The Local Impact of Cattle Farming** has examined the local impact of a low income farming sector, cattle farming in a typical cattle farming county in the West of Ireland, County Clare. Their input-output analysis reveals that cattle farmers in the county purchase and sell approximately 80 per cent of their livestock within the county and rely upon Clare suppliers for almost 90 per cent of their inputs and overheads. Teagasc SMILE modelling data indicates that annual gross cattle output in 2008 stood at approximately €97 million for farming in Clare.

1. <https://www.revenue.ie/en/corporate/documents/research/farming-profile-2020.pdf>

2. Question 452 - <https://debatesarchive.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2019012900080#WRX04300>

3. <https://ageconsearch.umn.edu/record/276231/files/The%20Local%20Impact%20of%20Cattle%20Farming.pdf>

Green Infrastructure and Flood Management

Whilst we acknowledge that Green infrastructure uses nature's own capacity to absorb excess waters and can play a major role in sustainable flood risk management within the county. This does not necessitate the need to abandon arterial drainage and estuarine embankment schemes. Under Section 37 of the Arterial Drainage Act 1945, the OPW is statutorily obliged to maintain all channels, embankment and structures on which it has executed works since the 1945 Act in "proper repair and effective condition. Maintenance referred to under the Arterial Drainage Act 1945 includes:

- i. The maintenance of river channels in a condition that ensures they are free-flowing thus reducing flood risk and providing adequate outfall for land drainage.
- ii. The maintenance of river and coastal embankments, in a condition that protects benefitting land, to the extent defined in the Scheme, from risk of flooding.
- iii. The maintenance, repair, and/or replacement of all structures forming part of a Scheme, including accommodation bridges, weirs, sluice barrages, sluices, pumping stations, grids, sand traps and tidal flap gates.

Storm and flood damage have caused damage in many areas throughout the County and inflicted severe hardship to farmers and primary food production within the catchments area. Examples include: rock and debris being strewn across farmland along the Atlantic shore flood defences where barriers have been breached with seawater and vast areas of residential, business and farmland areas flooded adjacent to the River Shannon. The land and the coastal defences require remedial works which take many months and great expense to remedy. Ensuring regular maintenance and remedial works combined with assessments of flood risk management, flood prevention, protection and mitigation works are essential in reducing the risk of embankment failure under extreme conditions. Current flood defence embankments and the new construction of sustainable flood defences in coastal and estuarine areas, combined with appropriate management of water levels, works to improve the capacity of channel conveyance on the River Shannon and all rivers across the county is critical to protect people, property, farmland and the environment from high flood and storm water level. Bodies such as the Local Authority or the Office of Public Works have statutory responsibilities in relation to maintenance, repair, and/or replacement in relation for coastal arterial drainage, drainage districts and estuarine embankment/flood walls.

The current Minor Works scheme to alleviate flooding is too onerous, leading to a significant underspend in many local authority areas. Local authorities must ensure maximum annual drawdown of funds available to alleviate and remedy flooding works.

Local authorities must also undertake analysis and risk assessment works of all current flood embankments and flood prevention measures as they can become less effective over a period of time for a number of reasons such as: increased frequency of flooding due to climate change, an increase in the required standard of service or other functional requirements, and long-term deterioration from the intended condition - as constructed or maintained.

The overreliance on green infrastructure, rather than using traditional 'grey infrastructure' such as embankments and dykes to manage flood events has not worked to the degree it should. Local Authorities should ensure that lands that benefit under the arterial drainage scheme, drainage districts or embankments, permit any authoritative body that wishes to undertake works have their respective maintenance responsibility recognised, whether it's the OPW for the arterial drainage scheme and Local authorities for the drainage districts. Avoid damage to, and where possible improve, the function and quality of The original intention of Arterial Drainage Schemes and Land

Commission Embankments was to improve the agricultural productivity of poorly drained or land liable to flooding. Continuation of current maintenance activity in the Arterial Drainage Maintenance Activities 2016-2021 will have moderate positive impacts on agricultural economic activity. Confidence in the continuation of maintenance activity will allow for medium term regional economic benefits.

Clare IFA Proposal 1.(Flood Risk Management, Green Infrastructure & Biodiversity)

Add an additional objective to **CDP 2.12** Flood risk Management, Green Infrastructure & Biodiversity

Development Plan Objective: Flood Risk Management, Green Infrastructure & Biodiversity		
	Current	Proposed Amendment
CDP2.12	It is an objective of Clare County Council: a) To facilitate and implement green infrastructure developments as a means of managing flood risk and enhancing the natural environment in the Plan area in compliance with Objective CDP 3.1; and b) To avail of opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats where flood risk management measures are planned subject to the requirements of the Habitats Directive.	It is an objective of Clare County Council: a) To facilitate and implement green infrastructure developments as a means of managing flood risk and enhancing the natural environment in the Plan area in compliance with Objective CDP 3.1; and b) To avail of opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats where flood risk management measures are planned subject to the requirements of the Habitats Directive. c) To facilitate and implement ongoing repair and maintenance to grey flood and drainage infrastructure' such as embankments, dykes, channels and rivers as a means of managing flood risk and enhancing the natural environment and farmland habitats in the Plan area in compliance with Objective CDP 3.1

Community Energy, Bio-Energy & Micro-Generation

The farming community want to play an active part in the green agenda, and this commitment will also reduces cost inputs for farmers as well as helping Government deliver on the 2030 carbon reduction targets. Rural communities must be at the centre of future renewable energy developments, and as such must be provided with an opportunity to participate in and benefit from future renewable projects. Clare county council could take the lead here with the piloting of a project to provide the framework for communities to raise finance to support a renewable energy project.

Renewable energy including solar, wind, tidal and biomass provide a diversified income stream for many of our members and will support future generations to remain on the land and ensure a secure income to supplement on-farm incomes.

Clare IFA would welcome planning exemption for farmers and rural communities for small scale developments. One-stop advice clinics should be provided to assist project developers to submit successful applications.

Clare IFA propose that the areas identified as strategic in principle for wind energy in the current plan be maintained in the new CDP, with additional areas identified to ensure balanced development throughout the county.

Clare IFA Proposal 2A (Community Energy)

Development Plan Objective: Community Energy		
	Current	Proposed amendment
CDP2.16	<p>It is an objective of Clare County Council:</p> <p>a) To support and encourage the development of community owned energy initiatives at appropriate locations across the County;</p> <p>b) To support communities seeking designation as ‘Sustainable Energy Communities’; and</p> <p>c) To explore the potential of designating Shannon Town Centre as a ‘Sustainable Energy Community’ during the lifetime of the Plan.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To support and encourage the development of community owned energy initiatives at appropriate locations across the County;</p> <p>b) To support communities seeking designation as ‘Sustainable Energy Communities’; and</p> <p>c) To explore the potential of designating Shannon Town Centre as a ‘Sustainable Energy Community’ during the lifetime of the Plan.</p> <p>d) To explore and assist finance the development of community owned energy initiatives at appropriate locations across the County.</p>

Clare IFA Proposal 2B (Bio-Energy)

Development Plan Objective: Bio-Energy		
	Current	Proposed Amendment
CDP2.19	<p>It is an objective of Clare County Council:</p> <p>To facilitate and support the development of bio-energy opportunities, facilities, and associated enterprises throughout the County including on brownfield sites subject to normal planning considerations</p>	<p>It is an objective of Clare County Council:</p> <p>To facilitate and support the development of bio-energy opportunities, facilities, and associated enterprises throughout the County including on agricultural lands and brownfield sites subject to normal planning considerations</p>

Urban and Rural Settlement Strategy

It has been difficult to encourage new blood into some sectors of farming over the last number of years due in part, to the opportunities that existed outside the farm and income pressures in some sectors. It is important that every effort is made to encourage a sufficient number of these people to choose farming as a career. With this in mind, it is absolutely vital that entry into the industry is supported by our Local Authority as over zealous regulation and bureaucracy drives young farmers away from farming and rural communities.

The age profile of farmers now is one of the main reasons why workplace accidents are higher in farming than in any other industry. Unlike their parents and grandparents, who worked with one or two employees, they are generally farming alone, those who have their successor working with them, are equally anxious to have sons, daughters, niece & nephews living close to the farmyard, so that they can be quickly available in emergencies, or anytime a few more hands are needed.

Clare IFA believe that farm family members who work on the family farm should be facilitated where possible in their efforts to build a home on a site close to the farmyard, as they need to be available at all times to check on their livestock. We also contend that other family members who work in the local area should also be given priority to build their homes on their family farm if they so wish.

Emphasis should be on facilitating people to live in, and contribute to, the communities where they grew up, whether they wish to raise their families there or to retire back there. Their ancestors have lived there, and they inherit that spirit, of being custodians of their home place. Their ability to settle there enhances the quality of life of the existing community, and benefits the local economy and culture. The sustainability of our educational, commercial, sporting, social & community facilities and the sustainability of farming enterprises in this area is dependent on the facilitation of young local families to settle at home. The need for people to work from home in 2020 led, in the earlier phase, to a 65% decrease in traffic, and in the later phase, when schools returned, to a 35% decrease. The environmental and societal benefit of working at or close to home will be greatly helped by improved broadband roll-out, provision of digital services, remote working, co-working/multi-purpose spaces, something Clare County Council should be continuing to deliver.

An approach which adopts a greater degree of flexibility to allow rural landowners, extended family networks and other interested parties to develop structures on their lands should be adopted. Extended family networks are commonly the core of townland and parish activity in rural Ireland.

Whilst not being employed directly on family farms, extended family members often provide assistance at busy times of the year. Other community life such as organisation of sporting activities, community development work and social gatherings are often co-ordinated by these same people. The County Development Plan must acknowledge the importance of farming and vibrant rural communities and recognise the need for rural housing for farmers and their extended family network members who have an intrinsic link with the rural community. It is important that people who have roots in a rural community are allowed to build a home in that area. Any measures that result in young people returning to live and contribute to rural communities should be welcomed.

Clare IFA Proposal 3A & 3B.

Amend the wording of the criteria used to determine Category A-Economic Need and Category B – Social Need, in relation to the Development plan objective **CDP 4.14** in the Urban and Rural Settlement Strategy.

	Current wording	Proposed amendment 3A
CDP4.14	<p>Category A– Economic Need</p> <p>i. Such persons shall be defined as persons who by the nature of their work have a demonstrable economic need to reside permanently in the rural area close to their place of work. Such circumstances will normally encompass persons involved in fulltime farming, horticulture, forestry, bloodstock or marine-related activities as well as others who can demonstrate a genuine need, because of their occupation or business (not including bed and breakfasts) to live in a specific rural area. Similar part-time occupations can also be considered where it can be demonstrated that it is the predominant occupation and that the ancillary occupation(s) are located within a reasonable daily commuting distance from the site or alternatively may be facilitated through remote working. The applicant must not already own or have owned a house in the surrounding rural area (except in sub-category iii as set out under the Social Need criteria) and needs the dwelling for their own permanent occupation. Where a person’s economic need relates to their engagement in farming or bloodstock they shall have a minimum farm size of 12.5 hectares within the local rural area. Where this minimum requirement is not achieved favourable consideration will only be given where a business plan can satisfactorily demonstrate that the person’s predominant occupation relates to farming or bloodstock activities on their landholding and which also demonstrates the viability of the activity(s).</p>	<p>Category A– Economic Need</p> <p>Such persons shall be defined as persons who by the nature of their work or through existing and immediate family ties have a demonstrable economic need to reside permanently in the rural area close to their place of work. Such circumstances will normally encompass persons or through existing and immediate family ties, who are involved in fulltime farming, Agritecth and Agrifood sectors, horticulture, forestry, bloodstock or marine-related activities as well as others who can demonstrate a genuine need, because of their occupation or business (not including bed and breakfasts) to live in a specific rural area. Similar part-time occupations will also be considered where it can be demonstrated that either the predominant occupation or the ancillary occupation(s) are located within a reasonable daily commuting distance from the site. The applicant must not already own or have owned a house in the surrounding rural area (except in sub-category iii as set out under the Social Need criteria) and needs the dwelling for their own permanent occupation. Where a person’s economic need relates to their engagement in farming or bloodstock they shall have a minimum farm size of 3.0 hectares within the local rural area. If the applicant is engaged in pig, poultry, vegetable and fruit farming and is a registered food producer with the department of Agriculture Food & the Marine this limit will be removed. Where this minimum requirement is not achieved favourable consideration will only be given where a business plan can satisfactorily demonstrate that the person’s predominant occupation relates to, horticulture farming, Agritecth and Agrifood sectors, forestry, bloodstock activities on their landholding or marine-related activities, and which also demonstrates the viability of the activity(s).</p>

	Current	Proposed Amendment
CPD4.14	<p>Category B – Social need A person who is an intrinsic member of a local rural community who was born within the local rural area, or who is living or has lived permanently in the local rural area for a minimum of 10 years either as one continuous period or cumulatively over a number of periods prior to making the planning application and who has a demonstrable social need to live in the area. This includes returning emigrants seeking a permanent home in their local rural area who meet these criteria. It also includes persons who were born or lived in a rural area for substantial periods of their lives and where that area is now within an urban settlement boundary/zoned land. The applicant must not already own or have owned a house in the surrounding rural area (except in the exceptional circumstances as set out in sub-category iii below) and needs the dwelling for their own permanent occupation.</p>	<p>Category B – Social need A person who is an intrinsic member of a local rural community who was born within the local rural area, or who through existing and immediate family ties is living or has lived permanently in the local rural area for a minimum of 10 years either as one continuous period or cumulatively over a number of periods prior to making the planning application and who has a demonstrable social need to live in the area. This includes returning emigrants and students seeking a permanent home in their local rural area who meet these criteria. It also includes persons who were born or lived in a rural area for substantial periods of their lives and where that area is now within an urban settlement boundary/zoned land. The applicant must not already own or have owned a house in the surrounding rural area (except in the exceptional circumstances as set out in sub-category iii below) and needs the dwelling for their own permanent occupation.</p>

Agricultural Development

Agriculture remains a highly important part of the local economy and the sector will be one of the main drivers of economic growth and employment creation in the coming years. Employment opportunities can be created through agricultural development/diversification to supplement farm incomes, to regenerate the rural economy and to sustain rural communities.

The agricultural sector will continue to innovate and adapt to the challenges posed by modernisation, restructuring, market development and the increasing importance of environmental issues. An economically efficient agricultural and food sector, together with forestry, sensitive exploitation of natural resources and diversification into alternative on-farm and off-farm activities, are essential components for the development of the rural economy.

Clare IFA proposal 4

Development Plan Objective: Agricultural Developments		
	Current	Proposed Amendment
CDP6.20	<p>It is an objective of Clare County Council:</p> <p>a) To support and encourage the development of alternative farm enterprise, agri-tourism projects and farm shops on agricultural lands which are complementary to the agricultural operation on the farm and the biodiversity supported by the farm, subject to compliance with appropriate planning, environmental and services requirements; and</p> <p>b) To support and encourage the re-use of redundant farm buildings of vernacular importance for appropriate agritourism enterprises subject to compliance with appropriate planning and services requirements.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To support and encourage the development of alternative farm enterprise, agri-tourism projects and farm shops on agricultural lands which are complementary to the agricultural operation on the farm and the biodiversity supported by the farm, subject to compliance with appropriate planning, environmental and services requirements; and</p> <p>b) To support and encourage the re-use of redundant farm buildings of vernacular importance for appropriate agritourism enterprises subject to compliance with appropriate planning and services requirements.</p> <p>c) Protect good quality agricultural lands from development which could be accommodated elsewhere and that would undermine the future agricultural productivity of the lands or irreversibly harm the commercial viability of existing or adjoining agricultural land</p> <p>d) Facilitate the sustainable modernisation of agriculture and to encourage best practice in the design and construction of new agricultural buildings and installations to protect the environment, natural and built heritage and residential amenity.</p>

The Food Industry

Food production is a growing industry in County Clare, with businesses ranging from largescale catering operations to an extensive network of artisan food producers. There is significant potential to grow this industry, particularly in terms of the development and production of new products. To support growth in this industry, Local Enterprise Office Clare encourages and supports the development of networks within the food industry throughout the County.

The agri-food industry, and in particular local food production, has an important role to play in ensuring sustainability and resilience. Local food production in Clare can provide both local employment and a better product for the consumer. Diversification into alternative on-farm and off-farm activities such as the Artisan food and drinks sector is also playing an increasingly important role in the economy of the county, particularly in rural areas. Local Country Markets are also making an important contribution to the food sector and local economy with markets held throughout the county on a weekly basis.

Clare IFA proposal 5

Development Plan Objective: The Food Industry		
	Current	Proposed
CDP6.21	<p>It is an objective of Clare County Council:</p> <p>a) To encourage and support the development of food networks throughout the County in order to support the expansion of the food industry.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To encourage and support the development of food networks throughout the County in order to support the expansion of the food industry.</p> <p>b) Support and facilitate the implementation of the strategic objectives of Food Vision 2030 – A World Leader in Sustainable Food Systems to sustainably develop the agricultural and food sectors that contribute enormously to the economic development of rural areas</p> <p>c) To support and facilitate the development of food-hubs as a contributor to the growth of the indigenous food industry in Clare, supporting local producers and locally sourced ingredients producers.</p> <p>d) Engage and collaborate with key stakeholders, relevant agencies, sectoral representatives and local communities to develop the agri-food sector in Clare, to promote and showcase the agri-food sector, and to ensure that the economic potential of the sector is secured for the benefit of the local and national economy.</p> <p>e) Support and promote the hosting of markets (including farmers markets) in towns/villages throughout the county.</p>

Rural Development and Natural Resources

The agriculture sector is of significant importance to the economy in Co. Clare with in excess of 6,500 farm family holdings and a farmland area of almost 218,000 hectares. There are 3,423 people employed directly in the agriculture, forestry and fishing sectors, which accounts for approximately 13% of total employment in the County. Agriculture in Clare supports thousands of jobs in the rural economy: both directly in food and drink processing and also indirectly in the wider agricultural industry.

A trend of unequal development exists between urban and rural areas. Economic activity is stronger in urban than rural areas. Rural areas face a series of challenges, such as concentration of landownership or aging of rural population. The non-replacement of retiring farmers will pose certain problems in the future. Reduced workforce, increased isolation in rural areas, disappearance of small family farms, land abandonment, age profile of farmers, and the location of off-farm employment all would provide particular barriers for rural Clare.

Successful Farm generational renewal has many obstacles such as access to land, land mobility and land restructuring, access to finance and credit, access to knowledge, access to new digital technologies and advice. These could equally be shared with the wider rural population. Ensuring the adequate provision of basic services in rural areas, would be a precondition for social sustainability and the viability of rural areas.

CLARE IFA proposal 6

Addition of 1 line to the strategic Aims under Chapter 8 Rural Development and Natural resources

Strategic Aims (8.1)

Current	To reinforce the vitality and future of rural villages and settlements and to recognise the roles that they play in the wider social and economic context;
	To encourage and support the social and economic development of rural parts of the County;
	To support local rural economies and communities and facilitate the diversification of local rural enterprises and work practices;
	To ensure that key assets of rural areas such as the natural and built environment are protected and enhanced, and that rural areas with resources such as renewable energy, water sources, and aggregates are sustainably developed;
	To harness a pride of place among rural communities and to assist rural communities to promote their cultural and natural resources;
Proposed addition	To maintain and support into the future the County's rural/coastal communities including the traditional family farm;

CLARE IFA Proposal 7

Amendment to plan Objective CDP 8.3

Development Plan Objective: Alternative Farm Enterprises		
	Current	Proposed Amendment
CDP8.3	<p>It is an objective of Clare County Council:</p> <p>To assist the sustainable development of the rural economy through the facilitation and encouragement of:</p> <p>i) Alternative farm enterprises, agri-tourism projects and farm shops;</p> <p>ii) The re-use of redundant farm buildings of vernacular importance for appropriate agri-tourism enterprises, subject to compliance with appropriate planning, environmental and services requirements and the appropriate maintenance and protection of Clare's natural landscapes and built heritage which are vital to rural tourism and ensure development is in compliance with the environmental requirements of Objective CDP3.1; and</p> <p>iii) Farm-based renewable energy technologies such as bioenergy and anaerobic digestion, in compliance with relevant environmental legislation.</p>	<p>It is an objective of Clare County Council:</p> <p>To assist the sustainable development of the rural economy through the facilitation and encouragement of:</p> <p>i) Alternative farm enterprises, agri-tourism, agri-tech, agri-food, primary food processing projects and farm shops;</p> <p>ii) The re-use of redundant farm buildings of vernacular importance for appropriate agri-tourism enterprises, subject to compliance with appropriate planning, environmental and services requirements and the appropriate maintenance and protection of Clare's natural landscapes and built heritage which are vital to rural tourism and ensure development is in compliance with the environmental requirements of Objective CDP3.1; and</p> <p>iii) Farm-based renewable energy technologies such as bioenergy and anaerobic digestion, in compliance with relevant environmental legislation.</p>

CLARE IFA Proposal 8

Amendment to plan Objective CDP 8.4

Development Plan Objective: Agriculture		
	Current	Proposed Amendment
CDP8.4	<p>It is an objective of Clare County Council:</p> <p>a) To facilitate proposals for sustainable and economically efficient agricultural and horticultural development whilst maintaining and protecting the environment, the natural landscape and built heritage;</p> <p>b) To encourage the linking of agricultural production with added value enterprise and the diversification of rural enterprises;</p> <p>c) To support the development of rural/farmers markets and the development of food-based enterprises and tourism activities; and</p> <p>d) To support the on-going growth and development of the artisan food sector in the County.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To facilitate proposals for sustainable and economically efficient agricultural and horticultural development whilst maintaining and protecting the environment, the natural landscape and built heritage;</p> <p>b) To encourage the linking of agricultural production with added value enterprise and the diversification of rural enterprises;</p> <p>c) To support the development of rural/farmers markets and the development of food-based enterprises and tourism activities; and</p> <p>d) To support the on-going growth and development of the artisan food sector in the County.</p> <p>e) To maintain and support into the future the County's rural/coastal communities including the traditional family farm;</p> <p>f) Protect good quality agricultural lands from large scale development which could be accommodated elsewhere and that would undermine the future agricultural productivity of the lands or irreversibly harm the commercial viability of existing or adjoining agricultural land.</p>

CLARE IFA Proposal 9

Amendment to plan Objective CDP 8.5

Development Plan Objective: Rural Services		
	Current	Proposed Amendment
CDP8.5	<p>It is an objective of Clare County Council:</p> <p>a) To encourage the development and facilitate the retention, where possible, of local services and shops in rural areas; and</p> <p>b) To facilitate the redevelopment of existing services as other enterprises within the countryside where necessary</p>	<p>It is an objective of Clare County Council:</p> <p>a) To encourage the development and facilitate the retention, where possible, of local services and shops in rural areas; and</p> <p>b) To facilitate the redevelopment of existing services as other enterprises within the countryside where necessary</p> <p>c) Support farm shops in rural areas where it is ancillary to an existing farm complex.</p> <p>d) Facilitate and support sustainable employment initiatives and the development of value-added opportunities linked to food, horticulture and agriculture and also support the development of village shops in villages and small village settlements where the scale of the development is compatible with the rural character of the area.</p> <p>e) Facilitate, support and encourage community-owned and managed shops and local services.</p>

CLARE IFA Proposal 10

Amendment to plan Objective CDP 10.11

Development Plan Objective: Recreational Routes		
	Current	Proposed Amendment
CDP10.11	<p>It is an objective of Clare County Council:</p> <p>a) To support the maintenance of existing off-road walking and cycling trails and support investment in the sustainable development of walking and cycling facilities, greenway and blueway corridors within the County and region extending into and between our County's settlements;</p> <p>b) To support and facilitate the development of the West Clare Railway Greenway and necessary supporting infrastructure;</p> <p>c) To promote the development of regional-scale off-road cycling trails and associated facilities in the Cratloe Woods area;</p> <p>d) To ensure that any proposed development for off-road walking and cycling are based on rigorous site/route selection studies, take into consideration the safe and adequate provision of access, set-down and parking areas, and where appropriate that natural borders/buffers are included as an integral component of the design;</p> <p>e) To complete heritage audits and improve heritage interpretation along walking and cycling routes in the County;</p> <p>f) To encourage and support the development of ancillary businesses such as bike hire and repair, outdoor clothing sales, drying rooms for walkers, surfers and others as well as businesses offering walking and cycling tours subject to normal planning considerations;</p> <p>g) To ensure that the development of any off-road walking and cycling routes, blueways and peatways is informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and any impacts that may arise from increased visitor pressures; and</p> <p>h) To ensure that all cycle routes adhere to the principles contained within the national policy document <i>Smarter Travel: A Sustainable Transport Future</i>, and the <i>National Cycle Policy Framework</i> or any updated/amended guidance document and that integration between routes is achieved where appropriate.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To support the maintenance of existing off-road walking and cycling trails and support investment in the sustainable development of walking and cycling facilities, greenway and blueway corridors within the County and region extending into and between our County's settlements;</p> <p>b) To support and facilitate the development of the West Clare Railway Greenway and necessary supporting infrastructure;</p> <p>c) To promote the development of regional-scale off-road cycling trails and associated facilities in the Cratloe Woods area;</p> <p>d) To ensure that any proposed development for off-road walking and cycling are based on rigorous site/route selection studies, take into consideration the safe and adequate provision of access, set-down and parking areas, and where appropriate that natural borders/buffers are included as an integral component of the design;</p> <p>e) To complete heritage audits and improve heritage interpretation along walking and cycling routes in the County;</p> <p>f) To encourage and support the development of ancillary businesses such as bike hire and repair, outdoor clothing sales, drying rooms for walkers, surfers and others as well as businesses offering walking and cycling tours subject to normal planning considerations;</p> <p>g) To ensure that the development of any off-road walking and cycling routes, blueways and peatways is informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and any impacts that may arise from increased visitor pressures; and</p> <p>h) To ensure that all cycle routes adhere to the principles contained within the national policy document <i>Smarter Travel: A Sustainable Transport Future</i>, and the <i>National Cycle Policy Framework</i> or any updated/amended guidance document and that integration between routes is achieved where appropriate.</p> <p>i) To ensure the procedures and practices contained within the Code of Best Practice (TII agreement) for National & Regional Greenways are carried out for all greenway and blueway corridors within the county.</p>

Countryside Recreation

As increasing numbers of people seek the beauty and exhilaration of outdoor travel and recreation, our collective mark on the environment and its natural processes increases. Litter, water pollution, disturbance of vegetation, wildlife, livestock and other people are all indicators of the need to develop a national ethic that protects both natural and cultural heritage. Techniques designed to minimise the environmental and social impacts in these areas are incorporated in and promoted by the national Leave No Trace education programme

CLARE IFA Proposal 11

Amendment to plan Objective CDP 10.12

Development Plan Objective: Countryside Recreation		
	Current	Proposed Amendment
CDP10.12	<p>It is an objective of Clare County Council:</p> <p>a) To support the diversification of the rural economy through the development of the recreational potential of the countryside, in accordance with the Comhairle na Tuaithe: <i>National Countryside Recreation Strategy</i> and the Walks Scheme and subject to compliance with Objective CDP3.1; and</p> <p>b) To promote and support access to rural areas including upland areas, forestry, coastal areas and the development of existing walking routes, pilgrim paths, mountain trails and nature trails in conjunction with other public bodies, representative agencies and community groups</p>	<p>It is an objective of Clare County Council:</p> <p>a) To support the diversification of the rural economy through the development of the recreational potential of the countryside, in accordance with the Comhairle na Tuaithe: <i>National Countryside Recreation Strategy</i> and the Walks Scheme and subject to compliance with Objective CDP3.1; and</p> <p>b) To promote and support access to rural areas including upland areas, forestry, coastal areas and the development of existing walking routes, pilgrim paths, mountain trails and nature trails in conjunction with other public bodies, representative agencies and community groups</p> <p>c) To support and promote the Leave No Trace Outdoor Ethics Education Programme designed to promote and inspire responsible outdoor recreation through education, research and partnerships</p>

Access onto National Roads (Proposal No 12)

Clare IFA proposes that consideration shall be given to the need of farm families to live on the family holding as a functional need to live at land adjoining which require direct access onto national roads. Consideration also needs to be given for farm infrastructure and animal husbandry requirements which require direct access onto national roads

CLARE IFA Proposal 13

Amendment to plan Objective CDP 11.5

Development Plan Objective: Walking and Cycling		
	Current	Proposed Amendment
CDP11.5	<p>It is an objective of Clare County Council:</p> <p>a) To require walkability and accessibility to be a central consideration in the planning and design of all new developments, transport infrastructure and public transport services;</p> <p>b) To facilitate and support the delivery of a safe, accessible and convenient cycle network and environment across the County and in the Limerick-Shannon Metropolitan Area as set out in the Cycle Network Plans;</p> <p>c) To support the development and enhancement of long distance cycling routes in County Clare, in accordance with the <i>Strategy for the Future Development of National and Regional Greenways</i>;</p> <p>d) To safeguard, where feasible, the route of the old West Clare Railway which has not been affected by existing development and to encourage its use for recreational purposes and/or as part of a tourist attraction. Exceptions to this include short sections within the curtilage of residential or commercial property;</p> <p>e) To support the development of cycle-lanes in urban areas linking residential areas to town centres, employment centres and school locations;</p> <p>f) To support the development of new accessible walking routes and trails throughout the County;</p> <p>g) To support the enhancement of permeability, footpaths and the provision of safe crossing points in the towns and villages of the County;</p> <p>h) To support the creation of a safer environment for cyclists and signposted 'quiet routes' off the arterial roads which include speed limit reviews and junction redesigns where appropriate;</p> <p>i) To require significant walking and cycling route proposals to provide a Quality Audit, as referred to in the <i>DesignManual for Urban Roads and Streets</i>; and</p> <p>j) To ensure the development, enhancement, safeguarding of all walking and cycling routes are in compliance with the environmental requirements of Objective CDP3.1.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To require walkability and accessibility to be a central consideration in the planning and design of all new developments, transport infrastructure and public transport services;</p> <p>b) To facilitate and support the delivery of a safe, accessible and convenient cycle network and environment across the County and in the Limerick-Shannon Metropolitan Area as set out in the Cycle Network Plans;</p> <p>c) To support the development and enhancement of long distance cycling routes in County Clare, in accordance with the <i>Strategy for the Future Development of National and Regional Greenways</i>;</p> <p>d) To safeguard, where feasible, the route of the old West Clare Railway or other alternative less intrusive routes which has not been affected by existing development including good quality agricultural lands and to encourage its use for recreational purposes and/or as part of a tourist attraction. Exceptions to this include short sections within the curtilage of residential or commercial property and land used for commercial food production</p> <p>e) To support the development of cycle-lanes in urban areas linking residential areas to town centres, employment centres and school locations;</p> <p>f) To support the development of new accessible walking routes and trails throughout the County;</p> <p>g) To support the enhancement of permeability, footpaths and the provision of safe crossing points in the towns and villages of the County;</p> <p>h) To support the creation of a safer environment for cyclists and signposted 'quiet routes' off the arterial roads which include speed limit reviews and junction redesigns where appropriate;</p> <p>i) To require significant walking and cycling route proposals to provide a Quality Audit, as referred to in the <i>DesignManual for Urban Roads and Streets</i>; and</p> <p>j) To ensure the development, enhancement, safeguarding of all walking and cycling routes are in compliance with the environmental requirements of Objective CDP3.1.</p> <p>i) To ensure the procedures and practices contained within the Code of Best Practice for National & Regional Greenways are carried out for all greenway and blueway corridors within the county</p>

CLARE IFA Proposal 14

Amendment to plan Objective CDP 13.11

Development Plan Objective; Coastal Erosion and Flooding		
	Current	Proposed Amendment
CDP13.11	<p>It is an objective of Clare County Council:</p> <p>a) To engage with the OPW so it develops appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks;</p> <p>b) To have regard to the <i>Clare County Strategic Flood Risk Assessment, CFRAM Flood Risk Management Plans</i>, the OPW <i>Coast Protection Strategy Study</i>, and any updated version/more detailed local studies, in the assessment of development applications in coastal areas;</p> <p>c) To permit developments only where the Council is satisfied that they will not be at risk from coastal erosion or inundation in the future;</p> <p>d) To permit developments only where the Council is satisfied that it will not result in an increase in coastal erosion or increase the risk of inundation, either at the subject site or at another location in the vicinity;</p> <p>e) To only permit development outside the boundaries of existing settlements where such development can be adequately defended over the lifetime of the development without the need to construct additional or new coastal defences;</p> <p>f) To support and facilitate the carrying out of coastal defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk from coastal flooding;</p> <p>g) To ensure full compliance with the requirements of the <i>Habitats Directive, Water Framework Directive</i> and overarching environmental Objective CDP3.1 of this plan with regard to development in the coastal area;</p> <p>h) To have regard to any future adopted Integrated Coastal Zone Management Plan for the coastal and estuarine areas of the County, undertaken in accordance with the <i>Habitats and SEA Directive</i>.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To engage with the OPW so it develops appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks;</p> <p>b) To have regard to the <i>Clare County Strategic Flood Risk Assessment, CFRAM Flood Risk Management Plans</i>, the OPW <i>Coast Protection Strategy Study</i>, and any updated version/more detailed local studies, in the assessment of development applications in coastal areas;</p> <p>c) To permit developments -where the Council is satisfied that they will not be at risk from coastal erosion or inundation in the future;</p> <p>d) To permit developments where the Council is satisfied that it will not result in an increase in coastal erosion or increase the risk of inundation, either at the subject site or at another location in the vicinity;</p> <p>e) To only permit development outside the boundaries of existing settlements where such development can be adequately defended over the lifetime of the development without the need to construct additional or new coastal defences;</p> <p>f) To support and facilitate the carrying out of coastal defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk from coastal flooding;</p> <p>g) To ensure full compliance with the requirements of the <i>Habitats Directive, Water Framework Directive</i> and overarching environmental Objective CDP3.1 of this plan with regard to development in the coastal area;</p> <p>h) To have regard to any future adopted Integrated Coastal Zone Management Plan for the coastal and estuarine areas of the County, undertaken in accordance with the <i>Habitats and SEA Directive</i>.</p> <p>i) To facilitate and implement ongoing repair and maintenance to grey flood and drainage infrastructure' such as embankments, sluice gates, dykes, channels and rivers as a means of managing flood risk and enhancing the natural environment and farmland habitats in the Plan area in compliance with Objective CDP 3.1</p>

CLARE IFA Proposal 15

Amendment to plan Objective CDP 15.30

Development Plan Objective; Green Infrastructure and Climate Change		
	Current	Proposed Amendment
CDP15.30	<p>It is an objective of Clare County Council:</p> <p>a) To work to create an integrated and coherent green infrastructure network to enhance biodiversity and quality of life, to facilitate the movement of wildlife, to connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses and wetlands, and to provide sustainable water management and a green setting for urban areas;</p> <p>b) To promote and facilitate the on-going development and improvement of green infrastructure, green corridors and ecosystem services in the Plan area, including green networks, green amenities and linked green corridors which ensure the provisions of recreational amenities, natural areas for the growth of wildlife and biodiversity, and a network of infrastructure which results in a better quality of life for visitors and inhabitants alike;</p> <p>c) To implement the adopted Green Infrastructure Plan for Shannon Town and its environs and any subsequent plan;</p> <p>d) To prepare a green infrastructure plan for Ennis and Kilrush during the lifetime of this Plan;</p> <p>e) To work with community groups to access funding for appropriate and beneficial green infrastructure projects including parks, woodlands, sports facilities, green areas, playground/play facilities, river corridors, walkways, cemeteries, churchyards, utility grounds, paths, seating and amenities;</p> <p>f) To require the preparation and assessment of all planning applications associated with amenity and/or recreational uses under the heading of green infrastructure to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this Plan;</p> <p>g) To require projects to be fully informed by ecological and environmental constraints at the earliest stage of project planning and that any necessary assessment be undertaken, including assessments of disturbance to species, where required; and</p> <p>h) To ensure compliance with all relevant legislation as outlined in Objective CDP3.1</p>	<p>It is an objective of Clare County Council:</p> <p>a) To work to create an integrated and coherent green infrastructure network to enhance biodiversity and quality of life, to facilitate the movement of wildlife, to connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses and wetlands, and to provide sustainable water management and a green setting for urban areas;</p> <p>b) To promote and facilitate the on-going development and improvement of green infrastructure, green corridors and ecosystem services in the Plan area, including green networks, green amenities and linked green corridors which ensure the provisions of recreational amenities, natural areas for the growth of wildlife and biodiversity, and a network of infrastructure which results in a better quality of life for visitors and inhabitants alike;</p> <p>c) To implement the adopted Green Infrastructure Plan for Shannon Town and its environs and any subsequent plan;</p> <p>d) To prepare a green infrastructure plan for Ennis and Kilrush during the lifetime of this Plan;</p> <p>e) To work with community groups to access funding for appropriate and beneficial green infrastructure projects including parks, woodlands, sports facilities, green areas, playground/play facilities, river corridors, walkways, cemeteries, churchyards, utility grounds, paths, seating and amenities;</p> <p>f) To require the preparation and assessment of all planning applications associated with amenity and/or recreational uses under the heading of green infrastructure to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this Plan;</p> <p>g) To require projects to be fully informed by ecological and environmental constraints at the earliest stage of project planning and that any necessary assessment be undertaken, including assessments of disturbance to species, where required; and</p> <p>h) To ensure compliance with all relevant legislation as outlined in Objective CDP3.1</p> <p>i) To ensure the procedures and practices contained within the Code of Best Practice for National & Regional Greenways (TII Agreed code of practice) are carried out for all greenway and blueway corridors within the county.</p>

CLARE IFA Proposal 16

Amendment to plan Objective CDP 17.7

Development Plan Objective; Town and Village Centre Vacancy		
	Current	Proposed Amendment
CDP17.7	<p>It is an objective of the Development Plan:</p> <p>a) To facilitate a co-ordinated and proactive approach to address vacancy in the Plan area, including liaising with owners, identifying barriers to use and examining design solutions proposed by owners to resolving identified difficulties;</p> <p>b) To facilitate/promote the alternative beneficial use of vacant property where the proposal will not negatively impact on the amenity of adjoining properties, the environment or movement/transport in the area;</p> <p>c) To continue to identify vacant Council-owned buildings and enterprise spaces in settlements in the County and work to maximise occupation of existing vacant buildings and brown field sites; and</p> <p>d) To target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.</p>	<p>It is an objective of the Development Plan:</p> <p>a) To facilitate a co-ordinated and proactive approach to address vacancy in the Plan area, including liaising with owners, identifying barriers to use and examining design solutions proposed by owners to resolving identified difficulties;</p> <p>b) To facilitate/promote the alternative beneficial use of vacant property where the proposal will not negatively impact on the amenity of adjoining properties, the environment or movement/transport in the area;</p> <p>c) To continue to identify vacant Council-owned buildings and enterprise spaces in settlements in the County and work to maximise occupation of existing vacant buildings and brown field sites; and</p> <p>d) To target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.</p> <p>e) Support farm shops in rural areas where it is ancillary to an existing farm complex.</p> <p>d) Facilitate and support sustainable employment initiatives and the development of value-added opportunities linked to food, horticulture and agriculture and also support the development of village shops in villages and small village settlements where the scale of the development is compatible with the rural character of the area.</p> <p>e) Facilitate, support and encourage community-owned and managed shops and local services</p>

CLARE IFA Proposal 17

Amendment to plan Objective CDP 17.8

Development Plan Objective; Town and Village Centre Vacancy		
	Current	Proposed Amendment
CDP17.8	<p>It is an objective of Clare County Council:</p> <p>To work in coordination with local communities in towns and villages to address barriers to revitalisation and growth in these areas.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To work in coordination with local communities in towns and villages to address barriers to revitalisation and growth in these areas.</p> <p>b) anyone wishing to build a house in rural areas which are suffering persistent and substantial population decline will be accommodated subject to in line with normal site suitability considerations</p>

Zoning of Agricultural Land & Land use Zoning

Clare IFA request that Clare County Council develop a policy framework for all future Land-use zoning designations, whereby each landowner is notified by formal consultation with intention to designate or alter zoning objectives for settlement plans land-use zoning categories and/or flood risk category assessments

CLARE IFA Proposal 18

Amendment to plan Objective CDP 19.20

Development Plan Objective; Zoning of Lands		
	Current	Proposed Amendment
CDP19.20	<p>It is an objective of Clare County Council:</p> <p>To ensure that sufficient lands are zoned at appropriate locations in the settlement plans and local area plans of the County, in accordance with the Core Strategy population and housing targets, in order to meet the envisaged land use requirements of the area during the lifetime of this development plan.</p>	<p>It is an objective of Clare County Council:</p> <p>a) To ensure that sufficient lands are zoned at appropriate locations in the settlement plans and local area plans of the County, in accordance with the Core Strategy population and housing targets, in order to meet the envisaged land use requirements of the area during the lifetime of this development plan.</p> <p>b) To develop a policy framework for all future Land-use zoning designations, whereby each landowner is notified by formal consultation in advance of the intention to designate or alter zoning objectives for settlement plans land-use zoning categories</p>

Nature of Zoning (Agriculture)

This zone is for the use of land for agricultural purposes and farming-related activities and to preserve the amenity of the town or village setting. Individual dwellings for permanent occupancy of established landowners (i.e. within family ownership for the preceding 10 years) and their immediate family members will be open for consideration subject to normal site suitability considerations.

Immediate family members would include:

- Parents
- Children
- Silblings

Clare IFA Proposal 19

1. The addition of Nieces and Nephew to this definition of immediate family members.
2. Additional categories of permitted applicants under Agriculture development proposals
 - a. Persons taking over the ownership and running of a farm on a full-time basis, who wish to build a first home on the farm, or close proximity to their workplace for their permanent occupation, where no existing dwelling is available for their own use. The proposed dwelling must be associated with the working and active management of the farm.
 - b. Other persons working full-time in farming or the marine sector for a period of over seven years, in the local rural area where they work and in which they propose to build a first home for their permanent occupation.

This submission outlines IFA's concerns, particularly IFA members in Co. Clare in relation to a number of key strategic issues identified by members, which they would like to see addressed in the Clare County Development Plan 2023-2029.

Clare IFA's submission on the forthcoming County Development Plan has been devised with an emphasis on collaboration with the council in order to ensure an effective and workable outcome for all concerned.