

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

Clare Women's Network – NCCWN – National Collective of
Community based Women's

Abstract

Submission on issues of Women's Inclusion for consideration in response to the public
consultation on the Draft Clare County Development Plan 2023-2029

CLARE WOMEN'S NETWORK -NCCWN

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Information on Clare Women's Network - NCCWN:

Clare Women's Network (CWN) is part of the National Collective of Community based Women's Networks (NCCWN) a national organisation funded under the Department of Children Equality, Disability, Integration and Youth. There are 17 networks across Ireland.

Our mission is to support the empowerment of and advocate for women who experience disadvantage and marginalisation, and to promote social justice, women's human rights and equality bringing about positive and sustainable changes to women's lives and society.

CWN does this by using community development and feminist approaches, with an emphasis on policy informed by the direct experiences of women, and challenging structures, attitudes and behaviours that marginalise women. CWN has a strong focus on advocating for women to bring about positive and sustainable changes to women's lives and society.

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

Preamble

NCCWN Clare Women's Network call on Clare County Council to gender proof this and all subsequent plans, policies and budgets, this also includes the implementation of gender budgeting. Gender proofing and gender budgeting are about real social inclusion and will ensure that the women of Clare, especially those who are most vulnerable and experience multiple forms of marginalisation and disadvantage, will always be taken into consideration when decisions are being made and that they will never again be left out of the conversation or thought process when determining actions and plans for the future. The implementation of gender proofing and gender budgeting helps us to notice conscious and unconscious bias that might prevent real social inclusion. They are useful tools for any planners and policy makers to regularly draw on. In the next sections we explain 'gender proofing' and 'gender budgeting'.

Gender Proofing

Gender proofing ensures that checks are carried out on any policy proposal to ensure that any potential gender discriminatory effects arising from that policy have been avoided and that gender equality is promoted.¹ Gender proofing can happen at all levels of Government and individual Departments.

Gender Budgeting

Gender budgeting is a way for (local and national) governments to promote equality through the budget process².

It is important to note that gender budgeting is not about creating separate budgets for women, or solely increasing spending on women's programmes. It is concerned with addressing budgetary gender inequality issues, such as how gender hierarchies influence budgets, and gender-based unpaid or low paid work.

Gender budgeting comprises activities and initiatives for preparing budgets or analysing policies and budgets from a gender perspective, it embeds gender-specific goals into fiscal policies and in general into the public financial management stream³.

Gender responsive budgets, and related policies, will contribute towards achieving gender equality and will simultaneously improve the population's welfare and lead to more sustainable and inclusive growth and employment.

¹ <https://eige.europa.eu/thesaurus/terms/1202>

² <https://www.oecd.org/gov/budgeting/gender-budgeting>.

Placing the measuring of wellbeing at the heart of the Clare Development Plan

We have an opportune moment in Clare as we enter the first stages of the Development Plan and look ahead to rebuilding the county after COVID-19. The pandemic and the resultant lockdowns and isolation is having a huge impact not only on the economy of the region, but on the mental health and wellbeing of our people. There was a mental health crisis in Clare before COVID-19, it is imperative that we make addressing the health and wellbeing of people in Clare a core priority of the Development Plan.

“What you measure affects what you do” (Stiglitz, Fitoussi and Durand, 2018) and thus, high quality data on well-being is crucial to inform policy action. We need to start measuring our progress as a region not just by economy factors, but by how our lives are improving, not just by our standard of living, but by our quality of life. Developing a robust set of wellbeing indicators will provide a framework from which policy decisions can be assessed in terms of how they will impact people's quality of life.

To obtain a balanced view of well-being, we need comprehensive dashboards of statistics that reflect what matters to people, covering wide-ranging outcomes such as people's income, health, social connections, safety and the environment. We need to look beyond country averages to understand not only whether life is getting better, but also for whom. Finally, we need to not only measure well-being today, but also the resources that help to sustain it into the future (OECD. 2020. Better Life Initiative).

The Clare County Development Plan needs to have as its focus the rebuilding of a thriving region post-COVID 19 – working to maximize the wellbeing of the people of Clare, and reduce inequalities after the pandemic. Better policies for better lives should be the ultimate goal of policymaking. Public policies will only be truly efficient and effective in delivering upon this promise if they go beyond supporting the economy, to focus on improving people's well-being, both “here and now” and for generations to come.

For well-being measures to start making a real difference to people's lives, they have to be explicitly brought into the policy-making process. The OECD wellness report, published in March 2020, shows that one of the biggest issues is the lack of connection with people community, and government. We are aware that the planners and policy makers strive to listen and dialogue with all stakeholders, we suggest that

a focus on well-being rather than just economics keeps a healthy balance between a thriving economy and a healthy people. We want both in Co Clare.

The importance of well-being is increasingly being recognised by national governments, several of which have designed well-being frameworks similar to the OECD's (Exton and Shinwell, 2018; Exton and Fleischer, 2020). Some OECD governments have also started to develop tools for integrating people's well-being into their strategic objectives and agenda setting, policy analysis and budgetary processes (Durand and Exton, 2019; OECD, 2019; Fleischer, Frieling and Exton, 2020).

The Sustainable Development Goals

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

While all goals are important and relevant to the lives of women and broadly speaking women are often disproportionately affected by many overarching issues within society, sustainable goal 5 and 10 have particular significance in addressing the consistent inequalities experienced by women living in local communities and rural areas. Creating opportunities for participation and inclusion are particularly challenging and there is huge scope for local authorities to embed commitment to the achievement of the SDGs, when developing the new County Development Plan.

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

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

THE GLOBAL GOALS

For Sustainable Development



'Inclusivity' has been named as one of the Five Strategic Development Plan Principles in the Draft County Development Plan, therefore Clare Women's Network welcomes the opportunity to make the following further submission.

Chapter One: Socio Economic Rights and Anti- Poverty:

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

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

Chapter Two - Climate Action

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

There is a lack of consideration in the chapter regarding how actions impact the lives of marginalised communities, which disproportionately affect women and children particularly those parenting alone and facing exclusion and/or poverty in Clare. Currently those on the least incomes are experiencing severe increases in energy costs including electricity, petrol, diesel, gas and home heating oil. There is evidence readily available from the CSO and other sources that Clare is an outlier in its dependence on oil fired central heating and on private cars for public transport. Clare Women's Network is currently working on an Anti-Poverty Strategy for Clare and some of the information gathered so far has demonstrated that 51% fewer people in Clare are able to use public transport than the national average, 59.1% of households in Clare are dependent on oil fired central heating, again this is almost 19% higher than the national average. Areas of Clare experience ongoing severe water pollution, from farming, forestry and untreated sewage, in particular areas of the county have poor air quality. Women are experiencing poor access to medical services and hospitals and no access to maternity services in Clare. Services are inferior to those available in other regional centres. The Draft County Development Plan does not in our view include measures around infrastructure and service provision, nor around economic developments which will address the above issues and unless action is taken the women of Clare will continue to experience inferior services and opportunities than are available elsewhere in Ireland. We note from other projects that the NDP and the RESS all take a regional approach to planning and we consider that Clare is poorly served by this approach as it occludes the accurate information needed for planning at a local level.

It is noted that *2.1 Strategic Aims* makes no reference to climate/carbon proofing existing buildings including local authority housing. While a future focus is beneficial

there are numerous existing buildings that need significant investment to bring to a suitable standard.

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

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

- Clare Women's Network recommends the inclusion of social inclusion representatives on the Adaptation Steering Committee outlined in *2.6.1 Local Adaptation and Business Operations*
- Clare Women's Network recommends that the Smarter Travel document mentioned in *2.6.2 Infrastructure and the Built Environment* which is currently under review is applied to Clare in a way that promotes universal access to public transport
- Clare Women's Network recommends Clare County Council adopt a **living wage policy** and that all economic development, businesses and projects which are supported in any way by the Local Authority must have as a requirement that employees of all ages are paid the living wage in any given year. The living wage is the minimum hourly rate at which a person employed full time with no dependents can be expected to provide for themselves. It is currently set at €12.90. For more information on the living wage see [Living Wage for Ireland](#)
- Clare Women's Network recommends the insertion of *2.10 Climate Justice* which will commit to protecting marginalised communities by;
 - providing enough good quality affordable housing
 - facilitating the development of renewable energy to cushion energy price fluctuations and create opportunities to employ local women in areas that have historic under/seasonal employment
 - ensuring that climate adaptation/mitigations actions do not further marginalise communities and prevent participation
 - remove the financial barriers that will prevent retrofitting homes which require it, especially in rural communities

- targeting recruitment for renewable energy apprenticeships towards socio-economic communities with few employment opportunities, encouraging women into apprenticeships where they have been traditionally excluded

Chapter Five Written Statement / Volume 8 - Housing Strategy

Women in Homelessness

The number of homeless families has increased by over 300% since November 2014

- The current rise in family homelessness is driven primarily by structural economic factors
- Domestic violence is a contributor to women's homelessness, yet women who are residing in emergency domestic violence refuges are not counted in the monthly homelessness figures
- A high percentage of women in homeless services have experienced some form of violence or abuse at some point in their lives⁵

Homelessness is a significant issue faced by many women across Ireland. Women in violent relationships are particularly vulnerable. This is due to the fact women are forced to leave the family home because of domestic violence which effectively makes them and their children homeless, while the abuser remains in the home. Provisions need to be put in place so women in violent relationships are safe to disclose their circumstance, fully protected from becoming homeless and supported to stay in the family home where possible. Homelessness makes vulnerable people far more vulnerable.

Clare Women's Network considers the draft county development plan in its written statement and housing strategy severely underestimates current and projected housing needs in the County even solely on the basis of the figures used in both documents of the projected population increase predicted by 2031. The housing strategy fails to meet the housing need it has itself estimated: household size in Ireland is 2.73 people and the estimates used in the DCDP housing strategy predict a population increase of between 15,000 and 18,000 by 2031 a figure which would require 5,494 homes or dwellings for the lower number and 6593 for the higher figure. These predictions also do not take into account the fact that there are already as of December 2021 almost 3,000 people on the social housing waiting lists in Clare which using the same average household size would require 1300 dwellings. Even using the lower figures from the above would indicate that 6794 dwellings are needed to provide for the population before 2031 and 5,284 by 2029 when the plan ends,

however logically going on the current timeline for planning and construction, for a dwelling to be available in 2031 it would have to be planned for in advance of the 2029 conclusion of this County Development Plan. Under the NPF Clare County Council have been allocated a **housing supply target of 4500** units which will be applied throughout the County Development Plan. Even by the most conservative estimates this figure underestimates the need by 784 dwellings in 2029. Clare Women's Network are concerned the draft county development plan does not appear to aim to address social housing waiting lists or to make any interventions in the levels of HAP scheme housing in the county. House and apartment prices in Clare have risen by 17.5 percent in 2021, rents by 15.7 % and land prices by 96% in two years to 2021. Along with increases in other household costs (which have a disproportionately severe effect on women but on the county as a whole, as was detailed under our comments on Climate Action), the current situation looks extremely likely to increase the number of people who require housing supports in the county. We note too that in recent days we have seen nearly 1000 people displaced from the conflict in Ukraine placed in accommodation in Clare and that there are approximately 500 people living in Direct Provision in County Clare and that national policy as per the White Paper on ending Direct Provision details that own door accommodation will become the standard for accommodating international protection applicants. The housing strategy has not accounted for this. **We do not consider the housing strategy for this draft county development plan to be adequate to meet the projected housing needs in the county.**

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

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

builders are available in the County. Clare Co Co currently only hosts 3 apprentices and this figure could be greatly expanded to include women, early school leavers into apprenticeships which they have traditionally been excluded from.

- Clare County Council should work with approved housing bodies including CENA to develop high quality sustainable energy efficient homes for the population including all demographics.

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

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

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

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

- Clare Women's Network recommends long-term sheltered housing for those who for whatever reason are unable to manage own-door accommodation.
- Clare Women's Network requests that any mother under the age of eighteen presenting to the Homeless Action Team be facilitated and taken care of with her child/children
- Clare Women's Network requests the Homeless Action Team and key workers at high levels of management within Clare County Council are trained on and understand the underlying and root causes of domestic violence and coercive

control, ensuring women and children are fully supported and not further traumatised when engaging with service providers.

- Clare Women's Network requests a policy of emergency outreach and offer of accommodation to women already experiencing a multitude of disadvantages living in insecure dwellings including trailers should be instigated particularly during red weather warnings.
- Clare Women's Network requests Clare County Council to undertake to provide emergency accommodation women presenting in need of it irrespective of their immigration or residency status in particular with respect to members of the Roma community.

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

Clare Women's Network notes that members of the Traveller community are amongst the most marginalised in Ireland and that along with other organisations and services in the county, Clare County Council needs to work proactively and ambitiously to improve the circumstances in which they live. Clare Women's Network considers it regrettable that Clare County Council continues to engage in costly and protracted legal disputes with members of the community and would strongly recommend that a new approach that seeks to provide sufficient suitable sustainable homes for the community be taken. Clare Women's Network notes the vacancy rate of 15% in Traveller Specific Schemes in the county is frequently used by Council officials to denote a lack of demand for this type of accommodation and would like to stress that such vacancy rates, or in fact higher figures should be expected due to the tradition and culture of nomadism and the practice of living in extended family groupings. CWN considers that it would be better practice to plan for such levels of vacancy as a given.

CWN further notes that although they make up less than 1% of the population in Clare, Travellers in 2021 were indicated by Clare County Council to comprise 50% of those presenting as homeless, whilst Travellers as a group are over-represented in the homeless population nationally the figure is 11% which indicates clearly that there is a specific problem in Clare. As members of Clare PPN, CWN further notes that representatives of PPN have repeatedly called for a participative housing needs assessment for the Traveller Community to be conducted in Clare and in this submission we repeat that call- planning effectively for the needs of the community without accurate and up to date information it is not possible.

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

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

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

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

Economic, Enterprise, Tourism and Retail Development

Nationally we know that 50% of women work for €20,000 a year. Women make up 86% of lone parents. The Clare County Development Plan should strive to economically improve the lives of all people living in Clare. This includes all workers earning a living wage and less reliance on tourism as a means of employment as this results in some people only gaining employment for certain seasons and not an all year round income.

Aid local communities in the establishment of co-operatives and community based agriculture.

Make sure all public buildings in County Clare are fully accessible for people with disabilities., this is in accordance with section 25 of the Disability Act 2005.⁸ This should include appropriate toilets and changing facilities. Footpaths should be wide enough and safe enough so wheelchair users can move around towns and villages at ease.

People with disabilities are only half as likely to be in employment as others of working age.⁹ In a 2018 employer survey the Employer Disability Information Service found that, employers reported that information resources and financial support would encourage them to employ people with disabilities.¹⁰ Could such supports be made available to employers in County Clare?

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<http://www.irishstatutebook.ie/eli/2005/act/14/section/25/enacted/en/html>⁹ <http://nda.ie/Publications/Employment/>

¹⁰<http://nda.ie/Publications/Employment/Employment-Publications/Comprehensive-Employment-Strategy2018-NDA-Review1.pdf>

Chapter Ten – Sustainable Communities

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

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

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

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

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

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

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

- The report highlighted rural transport as a barrier for young people in terms of employment, education and leisure and said that more job opportunities were needed locally and regionally.

Chapter Eighteen – Design and Placemaking

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

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

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

Thank you for taking the time to consider this submission. We welcome any queries in relation to it.

Warm Regards,

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On behalf of Clare Women's Network – National Collective of Community based Women's Networks


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