Submission Ref: S2-889



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Draft Clare County Development Plan 2023-2029 Planning Department Clare County Council New Road Ennis Co. Clare V95DXP2

23rd March 2022

Submission to Draft Clare County Development Plan 2023-2029

A Chara

On behalf of the Southern Region Waste Management Plan Authority (SRWMPLA), thank you for the opportunity of making a submission regarding the consultation for the draft Clare County Development Plan 2023-2029.

In relation to the context of our submission, please note that our current Southern Region Waste Management Plan 2015-2021, along with Ireland's other two Regional Waste Management Plans, will be replaced by the National Waste Management Plan for a Circular Economy, draft of which will be made available for public consultation in Quarter 3 of 2022.

The following are some items that we wish to highlight in relation to Volume 1 Written Statement of the draft Clare County Development Plan.

General promotion of the Circular Economy

We acknowledge the many areas of the draft Clare County Development Plan 2023-2029 where direct reference is made to the Circular Economy and the different benefits, including environmental and economic benefits, that arise from applying the concept of the Circular Economy, as referenced within Chapters 2, 6, 8 and 11.



We recommend that general reference to the Circular Economy be also made within the Introductory Chapter 1. Suggested wording could be as follows:

Clare County Council plays a fundamental role in the transition from a linear to a circular economy, through being responsible for key policies in public services that affect citizens' wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.

The following are some specific items mainly relating to waste management:

Chapter 11 Physical Infrastructure, Environment and Energy

Section 11.1 Strategic Aims

One aim is stated as follows:

To encourage and promote the benefits of the re-use and recycling of waste and to enable the provision of appropriate waste management facilities throughout the County in accordance with the National Waste Management Plan for a Circular Economy

To give it its full context, please note that the current Southern Region Waste Management Plan 2015-2021 will be replaced by the National Waste Management Plan for a Circular Economy.

Section 11.5.1 Waste Management Plans

The text refers to the Southern Region Waste Management Plan 2015-2015 and the three main targets contained within that plan. Please note that the Plan, along with Ireland's other two Regional Waste Management Plans, will be replaced by the National Waste Management Plan for a Circular Economy, draft of which will be made available for public consultation in Quarter 3 of 2022.



CDP 11.35 Development Management Plan Objective – Waste Management

In Item a) of CDP 11.35

We suggest that reference also be made here to the European Commission's more recent Circular Economy Action Plan: A New Circular Economy Action Plan for a Cleaner More Competitive Europe, launched in March 2020, which forms one of the main blocks of the European Green Deal. The New Circular Economy Action Plan builds on the aims and achievements of the first Circular Economy Action Plan Closing the Loop which was launched in 2015.

Also, please note that the National Waste Management Plan for a Circular Economy will be the successor to the Southern Region Waste Management Plan.

In Item f) of CDP 11.35, reference is made as follows:

To have regard to the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, July 2006 (and any subsequent guidelines) in the management of waste from construction and demolition projects...

Please note the following recently published guidelines Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021 by Environmental Protection Agency.

Section 11.5.2 Waste Transfer and Recovery

We suggest inclusion of the following

'Clare County Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the *Waste Management Infrastructure Guidance for Siting Waste Management Facilities*. This Guidance will be included in the upcoming National Waste Management Plan for a Circular Economy (NWMPCE), which will replace the *Southern Region Waste Management Plan 2015-2021* and the regional waste management plans for the other two regions.'



Section 11.5.4 Construction and Demolition Waste

CDP 11.38: Development Plan Objective: Construction & Demolition Waste As with Item f) of CDP 11.35 above, Please note the following recently published guidelines *Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*, published in 2021 by Environmental Protection Agency.

The SRWMPLA will be happy to provide further input or assistance regarding waste management, resource efficiency or the circular economy.

Yours faithfully Philippa King

Regional Co-ordinator Southern Region Waste Management Plan Office