

Re: Public consultation on the Draft Climate Action Plan 2023

Many thanks for the opportunity to comment on the Draft Climate Action Plan. This submission is send on behalf of Green Party Councillors for Dun Laoghaire-Rathdown County Council, Kate Ruddock, Oisín O'Connor, Tom Kivlehan

In general, it is very positive to see such a comprehensive plan to address climate change in the county. We must ensure that every decision we make as a local authority is informed by our twin crises in climate and biodiversity.

We have some overarching comments on the plan, and some specific to each of the chapters.

Overarching comments:

1. Can there be a clear statement that the Council is aligned with the National Climate Objective, and will work to reduce greenhouse gas emissions by 51% by 2030 both in those areas directly controlled by the Council (i.e. energy in Council buildings) and those where the Council has an indirect influence (i.e. road infrastructure).
2. Is it possible to quantify the greenhouse gas emissions from the County currently, and estimate what the emissions will be if all actions contained within the plan are undertaken?
3. The Council's approach to monitoring greenhouse gas emissions across the County should be outlined in the final plan. It is unclear how the plan will be assessed as to whether it is performing as intended or not.
4. The plan should include an estimate of the impact that each measure will have on reducing greenhouse gas emissions, and a level of prioritisation of the actions, so it can be known which actions are the most important to undertake and fund.
5. The final plan should include a carbon analysis of the 3-year capital programme. This would help with an understanding of the embedded, operational and indirect carbon impacts from each 3-year capital programme.
6. There are actions in the National climate action plan that are not integrated into the local climate action plan. This should be reviewed to include a greater level of ambition.
7. We would like the final Climate Action Plan to include an action for the annual council budget to include costings for each climate action in this plan on an ongoing basis. Each year, the Executive's budget report should include a schedule of the LCAP actions and the cost to implement in that year.

Energy and Buildings

We welcome this section and the areas covered and would like to see additional actions in the LCAP as follows:

1. Host one stop shop information drop in days in the main villages/council facilities for residents to learn more about retrofit options for their homes.
2. Develop plan to retrofit all council housing stock by 2030. There is no additional ambition for social housing stock retrofitting in the LCAP. The current level of retrofitting has plateaued. The Council are retrofitting 80-100 homes per year at present, with up to 3,000 homes having a rating of D1 or worse. The LCAP should include an ambition to retrofit all homes to above a C3 by 2030.
3. There should be an action for supporting Approved Housing Bodies and Multi Unit Developments in retrofitting their buildings. The LCAP should provide direction on the role the council should have in being a leader with such bodies. The institutional knowledge of best practice should be shared with organisations who also manage multi-unit developments.
4. The council have a role in the regulation of sale of solid fuels. There should be an action on this in order to limit the sale and burning of solid fuels in the county.
5. The LCAP should have an action to develop a support scheme for non-profits & community sector including sports clubs to manage their energy use and retrofitting. There should be an emphasis on helping them understand grants and benefits. One way could be to offer small grant for energy assessments?
6. The LCAP has no action for additional supports for businesses with reducing their energy emissions. There should be a specific action around increasing participation at green business courses and initiatives run through the LEO.

Transport

It's clear that Transport is both the area with the most amount of emissions to be reduced and the area of most difficulty to get political and public support for the action necessary.

We cannot identify anything in the LCAP in the area of transport that increases the level of ambition and gets us to a pathway of reducing emissions in line with the National Climate Action Plan. A frank assessment of plans for road network expansion, high parking provision, facilitation of larger more polluting vehicles and population increase in the county would indicate that transport emissions are projected to continue their increase. This is despite a projected improvement in the active travel network and far-into-the-future roll out of Bus Connects.

1. It is clear that aspirations to "promote" active travel and low carbon options is destined to achieve a very slow shift away from high-emissions transport. The actions in the plan should be focussed on the language of "enabling".
2. An action should be added for a communications exercise highlighting the new safe routes to school, the new segregated cycles ways etc, with maps. The council should also have a plan for the 5 years of communicating the benefits of the active travel network with the general public. Recognising that the support of those who may not use the network is important in the delivery of the network.
3. An actions be 'Improve pedestrian safety by widening footpaths, building out current sweeping curves etc'

4. Rather than simply using signalised pedestrian crossings, there should be an action to 'Expand the number of junctions where pedestrians have priority crossing, through raised continuous footpaths, zebra crossings, etc. '
5. There should be an action to target anti social parking e.g. reduce illegal car parking on footpaths, on double yellow lines and in cycle ways, and make it possible to have a target to expand the authority of parking enforcement officers to ticket illegally parked vehicles. Parking policy overall should seek to reduce emissions through preference for lower emission vehicles and disincentivising the use of high-emissions vehicles. An action could be phrased of "Increase parking compliance through a variety of measures such as enforcement, education and road design; Decrease emissions through the implementation of parking policy that incentivising the use of low emissions and zero tailpipe emissions vehicles over high-emissions vehicles; Introduce market pricing for all parking including council car parks and staff car parks in line with the National Climate Action Plan.
6. Pilot for a town bus to be introduced to Dún Laoghaire, linking the public transport nodes with residential areas and destinations.
7. There should be a concrete action to implement the GDA EV Charging Strategy 2022-2030.
8. The LCAP should include all of the active travel, Living Streets, Safe Routes to School and similar projects that are target to be **complete, under construction or approved** by the end of the current plan in 2029.
9. There needs to be an action around roads projects being climate-proofed (new and increased capacity). It's in the County Development Plan (Policy Objective T25). It's not sufficient that the transport section wouldn't include reference to the multiple new road/road expansion projects that the council executive continue to recommend in documents. All the Emissions savings in this plan could be wiped out by extra road capacity for cars that are included in the CDP.

5.8.3 Policy Objective T25: Environmental Assessment of New Roads

It is a Policy Objective that where projects for new roads, identified under Section 5.8, are not already provided for by existing plans/programme or are not already permitted, that the feasibility of progressing these projects shall be examined, taking into account environmental sensitivities as identified in the SEA Environmental Report (including greenhouse gas emissions and other emissions to air) and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection. In implementing this Objective, the Council will comply with any national policy or guidelines issued relating to the assessment of greenhouse gas emissions and other emissions to air for new transport projects.

- 10. As well as public bike parking (T13), the LCAP should have an action around providing support for bike parking in residential developments under certain conditions.
- 11. T12: "expand car sharing". The council actually can't expand car sharing but the action should be about reducing barriers for car sharing and providing incentives.
- 12. T10: deliver cycle training (in schools). The council don't deliver cycle training in schools. The schools do it with RSA funding and private providers. The emphasis should be on cycle training for under-represented groups through DLR Sports partnership.
- 13. The mode share targets that the County Development Plan has should be transcribed into the CAP. This is in the National Climate Action Plan 2023.

T4: Development of Sustainable Travel and Transport	✓	✓	✓	✓	✓	Co-ordination with relevant stakeholders, plan-making and development management.	Assessment: Change in transport modal share for travel to work, school and college. Data source: Census. Walking mode share target - 15% Cycle mode share target - 20% Other micromobility mode share target - 5% Public transport mode share target - 30%
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- 14. T17 tracking measure appears copied from elsewhere.
- 15. T18: suggest this includes an action on reducing number of fossil fuel vehicles in the council fleet and reducing KMs driven in favour of sustainable modes

16. Add Transport action support the GDA Air Pollution Strategy. This could also include an action to discourage idling or to assist in the implementation on any future legislation on idling.
17. There should be an action to support the implementation of the Greater Dublin Area Demand Management Strategy

Flood Resilience

Dealing with increased flooding is likely to become more of a challenge in the coming years as rainfall increases. The chapter in the Draft plan proposes a number of very positive actions to ensure as a county we are more resilient to flooding.

In addition we would like to see actions such as the following:

1. Actions on land to address storm sewer overflows and subsequent discharges into Dublin Bay and many of the county rivers. While we understand the maintenance and operation of the sewer system is the responsibility of Uisce Éireann, the Council can and should play a role in reducing the volume of water that flows into the sewers during rainfall events. We would like to see targeted measures, such as rain gardens, swales and other SUDS systems built into the urban environment in places where storm sewer overflows are most frequent.
These systems were designed to deal with infrequent overflow, and are no longer fit for purpose in an environment that is so heavily dominated with concrete. The negative impacts on water quality, biodiversity and human health are too great to allow this system to continue as it is currently operating.
2. Domestic misconnections are a huge problem across the county, and very little is known among the public. Can you include an action to target communications to areas where domestic misconnections are a known problem, and offer advice on how to correct the problems.
3. The increasing trend of removing grass and green spaces to provide concrete or tarmac from parking purposes is worrying. Can all instances where planning permission is granted for new parking spaces within existing front gardens, be granted with a requirement to use permeable paving and include SUDS measures.
4. Action point F9 - to ensure urban greening opportunities are implemented in council capital projects including new builds and retrofits - should not be limited to council only development, but instead include all development seeking planning permission in the County.

Nature Based Solutions

The emphasis on nature based solutions is very welcome. We have some additional suggestions for this section.

1. Can the plan point to where information on the existing locally important sites for biodiversity are, and set an action to increase the number of locally important biodiversity areas. The climate action plan could set a target of increasing the coverage of these locally important areas, or increase the number of them, and could set out a list of areas which could be considered for inclusion.
2. Increase the number of Tree preservation orders across the county. There are only two trees protected across the entire County area, and it is unclear what, if any, protections exist for trees across the County. While there are challenges with the existing legislation on tree preservation orders, we should still strive to protect our most precious trees.
3. An action could be included for the Council to prepare guidance on how members of the public should report illegal hedge cutting or tree felling during the breeding bird season.
4. We need to reduce the incentive that currently exists for landowners to clear fell sites prior to seeking development consent, and make sure that sites with mature woodlands and extensive biodiversity are protected and maintained as much as possible when land is being developed.
5. We have a wonderful network of parks for residents to enjoy, and while many of these parks are managed for wildlife and to conserve biodiversity, we think we could target a greater expanse of land for nature purposes across the county.
6. There have been a few pocket forests planted across the county in recent years. Can this initiative be expanded?
7. Can an action be included to investigate if there is potential to develop a new national park in Dun Laoghaire Rathdown, preferably including both land and sea?

Resource Management

1. Can an action be included in the plan to support activities and businesses within the community to reduce waste, e.g. reusable coffee cup schemes.
2. Following the successful trailing of recycling bins on streets across the county, can the plan include an action to reduce the volumes of street waste being sent to landfill/incineration, and recycle a greater proportion of street waste.
3. Can the plan include an action to ensure planning conditions are attached to all development for retail to include facilities for glass and plastic bottle recycling.
4. Following the recent change in legislation to allow CCTV cameras to be used to enforce waste legislation and illegal dumping, can the plan include an action to ensure CCTV cameras are used at known litter blackspots to discourage illegal dumping.

5. Can the plan include an action to ensure council owned facilities display best practice in resource management, e.g. limited single use items, procurement that enables reuse, repair and recycling of products.
6. Can the plan include an action to investigate suitable locations for a 'Rediscovery' style centre in Dun Laoghaire, and further support for social enterprises to set up in the area, such as the Bike Hub, which offers a wonderful upcycling service for bicycles, and employment and training opportunities for local people.
7. Can the plan include a communications action to inform people of the problems with flushing plastic items into toilets, and the challenges with misconnections to the storm sewer network.

Community Engagement

Community engagement is among the hardest things to get right when undertaking projects related to climate action. We need to develop new ways of engaging with the community to ensure that there is better understanding as to why certain changes and new projects within the community are being proposed. While a general understanding of the realities of climate change is likely well understood among the public, it is unclear that there is a general understanding among the public as to what climate action means for them, their commute, their food, their home, their energy etc.

Develop new ways of engaging with the community on climate.

Need a community engagement strategy on actions in this plan for implementation.

Other items we would like to see actions added on:

- Scope 3 emissions
- "Do no harm" principle to the council's grant support schemes. Decarbonise the items these schemes support. Support organisations, community groups etc on how to make applications that are in line with climate goals.
- LEO green business programmes: KPI for participation levels. Language around incentivising (i.e. rates rebates for businesses who take part)