



**Submission to consultation on the Dún Laoghaire-Rathdown County Council
Draft Climate Change Action Plan 2019-2024**

March 25th 2019

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The Green Party in Dún Laoghaire-Rathdown welcomes the publication of the Dún Laoghaire-Rathdown County Council Draft Climate Change Action Plan 2019-2024 – given the scale of the challenge we face, we must work at every level to tackle climate change

While we welcome the targets that have been set out in the Plan, we believe a more direct relationship needs to be outlined between the high level targets (33% improvement in the Council's energy efficiency by 2020 and 40% reduction in the Council's greenhouse gas emissions by 2030) set out in the Plan and the specific actions, thus allowing people to see a clear line of causality as to how emissions will be decreased (by how much in each area) and energy efficiency will be maximised (again, in each action and area).

On foot of this, we make the following three general points about the Plan overall, which are applicable to all areas:

1. The Plan requires more specific targets – every action should have a clear and identifiable numeric target and a completion date, which would allow more effective tracking of targets;
2. The Plan should be updated annually, not just every five years – this would allow greater tracking of actions and would allow the Council to adapt and, where possible, increase targets to be more ambitious;
3. The Plan includes only one page on Public Awareness, and this focuses primarily on the public's attitudes towards climate change as an overall problem and the Citizens' Assembly recommendations – while public awareness is an ongoing task which feeds in to all actions, the Council should include a more extensive and substantive section on raising public awareness not just about climate change generally, but about the specific relationship between the actions which government, local government, communities and individuals take and their climate impacts; and the opportunities and

We have then included a list of specific comments on the five individual areas identified in the Plan, as possible additions to and revisions of the actions contained in the Plan.

Transport

Pedestrians

The improving of pedestrian routes across the County and promoting walking where possible is an essential way of reducing our transport emissions, and while we welcome the Plan's commitment to the development of a high quality walking and cycling network we believe that the development, creation and improvement, of pedestrian networks should be a primary action item within this section of the Plan.

The improvements of pedestrian routes should include the provision of signpost access routes to closest public transport - including Luas, bus and DART. The changing of timing of pedestrian crossing lights so that they reduce the waiting time for a green man, would also encourage walking.

In the Plan, the phrase 'reduce parking' should be changed to a positive affirmation to allocate space currently used for parking to cycling, bus lanes and/or pedestrians.

The creation of links to key walking and cycling routes like the proposed Dodder Greenway are also essential, for example linking in a route along the Slang River in Dundrum in order to keep car traffic off the Dundrum Road.

Cycling

Encouraging and providing the facility for cyclists to travel safely and efficiently throughout the County is also essential for reducing our transport emissions.

Some additional measures for cycling in the County alongside those provided for in the Plan include: allowing bicycles on Luas during off-peak times; allowing bicycle racks on buses; direction of parking wardens to keep cycle lanes clear of parked cars; the construction of cycling and walking bridges across the M50; making bus lanes 24-hour where those lanes are shared with cyclists to reduce the chances of cars colliding with cyclists at night; making roundabouts safe for cyclists using best practice as developed in the Netherlands; the design of cycle lanes to be physically segregated from vehicle traffic so that they are safe for vulnerable old and young cyclists.

Schools

The Plan should expand upon its action to promote road safety and active travel in schools, and include an action to work with local schools, the Department of Transport and the Department of Education to dramatically decrease the number of students arriving to school by car by focusing on pedestrian and cycling infrastructure, followed by provision of school buses where necessary, with clear and identifiable targets.

The provision of car exclusion points at schools to reduce traffic should also be considered¹. This would make it safer for children to walk/cycle to school, would reduce carbon emissions, and reduce air pollution in the area surrounding the school.

Electric Vehicles

In order to make the use of electric vehicles easier for people, the retrofitting of terraced housing developments with on-street electric vehicle chargers for those without driveways should be included in the Plan.

¹ <https://www.theguardian.com/environment/2018/jul/13/uk-schools-move-to-ban-the-school-run-to-protect-pupils-from-air-pollution>

The Council should implement the policy it agreed in 2019 to replace its entire fleet with electric vehicles and to stop purchasing new fossil fuel vehicles, and to provide a timeline for the completion of this project.

DART + Luas

The Plan should include a commitment to improve the public realm in the kilometre radius of DART and Luas stations to encourage walking through these areas.

The Council should bring in CCTV in DART car parks, and at Luas cycle parks, to protect bikes from theft as currently €10,000 of bikes are stolen every month from Blackrock DART station.

Traffic

The Plan should include a commitment to implementing a traffic cell policy to allow communities to cure rat-running with filtered permeability, per National Transport Authority guidelines.

Energy and Buildings

Deep retrofits of housing stock to nZEB or EnerPHit standard

While we welcome the inclusion of an action point in relation to deep retrofit of the Council's housing stock, more specific targets need to be provided - including targets for number of houses to be retrofitted and indicative interim timelines along with an overall timeline for completion.

Solar panels on public buildings

Many public buildings are perfect for solar panelling, and the creation of an action to put solar panels on every publicly-owned building on which it is feasible, with specific targets and a timeline, would greatly assist in increasing the amount of renewable energy used by Council buildings.

In conjunction with this and to make the action more effective, the Council should encourage the Department of Communications, Climate Action and Environment to bring in a feed-in tariff for micro-generated renewable energy. This would allow energy created to be fed back into the grid, ensuring that it is not wasted - this would be particularly successful for buildings such as schools, where the buildings are mostly unoccupied during the sunniest times of the year.

Resource management

Recycling centres

The Council should investigate the provision of a further recycling centre or an expanded version of an existing centre in the County to service the north and north west of the County. The current three major Recycling Centres are all situated in the south or east of the County, in Ballyogan, Shanganagh and Glasthule, and therefore are less accessible for residents in the likes of Stillorgan, Clonskeagh and Churchtown.

Composting/brown bin facilities for apartment blocks

The Council should ensure that composting/brown bin facilities are made available for all apartment blocks in the County.

Community Compost Heaps

The Council should investigate providing community groups with shared composting resources, working with Tipperary County Council who have already outlined how this may be possible².

This would help reduce food waste, reduce the need for collection of brown bins by trucks, and provide compost to local gardens and allotments.

Recycling and composting workshops

The Council should provide workshops to local resident associations and community groups on recycling and composting rules and tips.

Fossil fuel stocks

The Council should ensure and confirm in the Plan that it is not invested in any fossil fuel stocks.

Flood Resilience

Across Dún Laoghaire Rathdown there are a range of flood risks, due both to coastal and river floods. Through previous storms we have seen damage to our coastal rail lines, town centres and suburban areas.

Given the forecasted increased probability of flooding as a result of climate change, it is imperative that we undertake immediate and innovative approaches to preventing flood damage.

² <https://www.tipperarycoco.ie/sites/default/files/Publications/Community%20compost.pdf>

These are the recommendations of the Green Party in Dún Laoghaire Rathdown.

Annual Survey of Coastal Erosion

In recent years we have witnessed significant erosion of the cliffs at Shanganagh and Woodbrook over short time periods³. We are also aware of significant threats to the coastal rail line, a main transport artery for the city, is at risk of any future erosion.

Therefore we recommend that an annual survey of coastal erosion be conducted, so that strategy for coastal erosion management and forward planning is always based on recent information and data.

Household Information

For many coastal households, the threats posed by erosion, rising sea levels, and coastal flooding are quite worrying. Given the significant number of people living on the coastline in the county, we would recommend that DLRCC works with the appropriate government departments to provide clear, accessible information on protecting property and options for damage remediation for owners of coastal property.

Clear lines of responsibility for flood prevention

We would recommend that it is made clear who has responsibility for flood prevention strategies and measures across the county, given the varying stakeholders involved - the OPW, Irish Rail, DLRCC and Irish Water. This will help to ensure that strategies are implemented and everyone knows where responsibility lies.

Catchment level approach to flooding

Much fluvial flooding is resultative of issues with upstream/catchment level river management. We recommend that DLRCC researches upstream river management strategies to see how they are applicable to rivers in the county, such as Shanganagh River, Deansgrange River, and the Dodder Slang.

Approaches such as tree planting around rivers, increasing infiltration of soil banks, reintroducing meanders, and installing “leaky dams” could all help to slow the flow and reduce downstream flooding. Such projects have been run by Shropshire Council to great effect⁴.

Install Urban Rain Gardens

³ <https://www.independent.ie/regionals/braypeople/news/cliff-walk-reopens-following-works-to-construct-new-bridge-36749775.html>

⁴ <https://shropshire.gov.uk/drainage-and-flooding/policies-plans-reports-and-schemes/slow-the-flow/>

Working with nature can offer an effective means of tackling flooding, even in already developed areas. While there is a reliance on drainage systems to remove excess rainwater in urban and suburban areas (where natural depressions are covered by impermeable materials), this is not wholly effective in addressing floodwater. Often drains will overflow, which in turn causes water to accumulate on roads/pavements, or run-off into local waterways (which carries a risk of contamination).

Installing rain gardens at flooding spots could present an alternative flood prevention method to drains. By replacing paving or slabs⁵ with small gardens of permeable soil and/or gravel with robust, native plants (preferably wetlands), much of the initial stormwater flow from heavy rain.

This practice is found in many cities across the world, and we would recommend that DLRCC connect with councils with similar urban styles who have put in place rain gardens, to see what styles are best suited.

Nature-based solutions

Micro-diversity areas within housing estates

We recommend that DLRCC to continue to and expand their work⁶ with residents' associations and other community groups to encourage micro-diversity areas within housing estates that residents can cultivate for wildflowers and insect hotels, or community gardens/allotments.

We would further suggest that such community groups are taught about using wildlife areas for flood management (see aforementioned rain gardens) and provide them with access to native, flood resilient plants.

Retention of mature trees

The Council should work to retain mature trees in built areas and to develop mini-woodlands in other parts, or even school orchards. Dún Laoghaire-Rathdown is home to many beautiful and old trees; as not only do they add value to property in the area, they are very beneficial to the community from environmental and health perspectives as well as flood management⁷.

DLRCC should create a protocol for addressing root damage of pavements, with a focus on saving the trees but ensuring that walkways remain accessible and safe to all users, with tree removal being a last

⁵ <http://www.hernehill.org.uk/news/switching-paving-plants-herne-hill>

⁶ <https://dlrcoco.ie/en/news/general-news/sustainable-gardening-workshops>

⁷ <http://www.cityoftrees.org.uk/project/howard-street-salford>

resort. Cities worldwide have created such protocols, as seen in The Seattle Department of Transportation “Trees and Sidewalks Operations Plan”⁸.

Wildlife corridors over the M50

The Council should include in the Plan the creation of wildlife corridors over the M50 – giving a channel of appropriate vegetation for insects, bees, and other such wildlife to travel across and ensure their ability to migrate, prevent habitat islands from forming, and strengthen their gene pools.