

**Uimhir Thagarta Uathúil:** SD-C195-281

**Údar:** Dublin Friends of the Earth

**Stádas:** Submitted

**Submission:**

Priorities and suggestions from Dublin Friends of the Earth

**Comhairliúchán:**

Draft South Dublin County Development Plan 2022 - 2028

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## Litir Chumhdaigh

Dublin Friends of the Earth (DFoE) is an active group of volunteers who work together to tackle urgent environmental issues. We are the volunteering arm of Friends of the Earth Ireland and focus on general climate action issues as well as pursuing environmentally related projects as the need arises. We would like to thank SDCC for the opportunity to provide a response in relation to this important public consultation.

## Observations:

### Chapter 1: Introduction, Strategic Vision and Climate Action

**Caibidil:** Volume 1: Written Statement » Chapter 1: Introduction, Strategic Vision and  
Cli...

The main area which Dublin Friends of the Earth are concerned with in the context of development in SDCC is the reduction of carbon emissions in line with the Paris Agreement and the recent Climate Act. Ireland had the third highest greenhouse gas emissions in the EU in 2019 and if we are to fall in line with carbon reduction targets much change is needed. Global temperatures must be kept below 1.5C pre-industrialised levels to avoid catastrophic consequences for the planet, flora, fauna and humans. Global greenhouse gas (GHG) emissions by 2050 must be zero. Fossil fuels are the single biggest cause of climate change and SDCC must play a hugely important role in helping communities to move from fossil fuels to renewable energy.

Dublin Friends of the Earth strongly recommends that the County Development Plan (CDP) ensures rapid phasing out of all fossil fuels. This includes gas and fracked gas (as part of its energy mix). We also strongly advocate that new data centres are powered onsite with renewable technology (e.g. rooftop solar farms or new offsite generation such as offshore wind or solar farms). Current data centres need to move to renewables and heat recovery systems should be enabled where technically possible.

We also call for improved communications policy from the Dublin CARO office, Codema and the Env/Climate Change section of SDCC with the public. For example, regular meetings, set up sub groups in SDCC suburbs/parishes/villages, weekly/monthly newsletter, better engagement with schools, colleges, workplaces, industry etc. Moving to a zero carbon society affects everyone, especially the vulnerable in SDCC. Every area / village / suburb needs a sustainable energy community. Every business, school, college, healthcare setting needs a

climate action plan. Additionally, more support /promotion of the above in association with the SEAI is needed. The SDCC Climate Change Action Plan (2019 to 2024) is an excellent document, and we need to maintain ambition and exceeding targets to achieve zero emissions by 2050.

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## Chapter 2: Core Strategy and Settlement Strategy

**Caibidil:** Volume 1: Written Statement » Chapter 2: Core Strategy and Settlement Strategy

We are happy to see that the plan wishes to promote the concept of the '10 minute settlement' in sdcc. This would allow people to access most of their daily needs (grocery shop, post office, school, medical facilities, church, playground, bring/recycling bank, park and pharmacy etc.) within a short walk or cycle trip from their home. Recent discussions have suggested people avoid using their cars for journeys of less than 2km (for health, emissions and congestion reasons). To help with this, we suggest opening up more housing estates where cul de sacs and high walls are preventing people quickly accessing nearby amenities, shops and schools, on foot or by bike. This would encourage more school children to walk and cycle to school in safety. Quietways would also be most welcome to allow greater active travel for people of all ages.

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## Chapter 4: Green Infrastructure

**Caibidil:** Volume 1: Written Statement » Chapter 4: Green Infrastructure

There has been good work done in some areas of SDCC in relation to wilding public spaces and parks. Patches of wild flowers can be found along road-sides and in parks which drastically improve the look of the area and also provide a haven for urban wildlife and insects. These patches require minimal care and maintenance yet make such a wonderful difference. Wild spaces in our public parks and in other spaces such along roadsides and in waste-ground spaces should be a core element of development design. Allowing grass patches to grow and allowing wildflowers to grow is hugely beneficial for pollinators and biodiversity generally. In terms of development standards it is imperative that native flora and fauna species are protected and facilitated to flourish in our green spaces.

Globally, there has been a serious drop in the amount of flying insects due to a myriad of factors. Green spaces should be designed to prioritise the needs of pollinators and indeed other urban wildlife and birds. This could include planting more native trees and plants; introduction of insect hotels on small waste-ground patches in sdcc and incorporation of water features to attract birds.

On your website we could not easily locate biodiversity information. It is not listed in the 'plan' section: <https://www.sdcc.ie/en/services/our-council/policies-and-plans/>. Biodiversity was also not listed in the alphabetical index on your home page. Under 'services/enviroment' we could not see a biodiversity section. Is your biodiversity plan still in draft stage? We do welcome your pollinator plan. The tree planting programmes on your website are from spring 2020, are you planning same for winter 2021?

Dublin Friends of the Earth especially looks forward to the publication of the SDCC tree management policy as soon as possible. The previous one expired in 2020.

In relation to tree planting, we would like to advocate for the adoption of the Miyawaki method of forestry, which grows mature native forests 10 times faster and 100 times more biodiverse than conventional plantations. These mini forests would be ideal for very small patches of public lands (starting at a square metre), neighbourhoods, schools, hospitals and in the grounds of other properties e.g. offices blocks, churches, industrial estates etc. and would be havens for wildlife.

New developments:

Has SDCC considered implementing a type of 'tree balance sheet' that could be required for new developments? The balance sheet would clearly indicate what the size, condition, and species of trees/hedgerows to be removed for any development and similarly include what new trees (numbers, size and species) are to be planted within the development. This would ensure that existing mature trees and hedgerows of good condition would have to be replaced with high quality specimens of similar size and appropriate species.

We believe guidance and hard standards for the specification of trees to ensure that they are of decent size and quality should be introduced. Standards and quotas (like what is done for bicycle or car parking within most planning grants) could also be set to achieve a minimum number or area (if providing mass planting of young forest/woodland) of trees/whips, therefore future canopy cover, for new developments. Obviously the number and size of trees that can be planted within each development will vary due to site constraints, but this will at least ensure that applicants requesting permission for new developments (public and private) will have to argue a case for a reduction in specification and numbers and probably most importantly, it will focus the minds developers and design consultants during the planning process.

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## Chapter 6: Housing

**Caibidil:** Volume 1: Written Statement » Chapter 6:  
Housing

Quality housing and sustainable neighbourhoods are very important. An equally important factor is how these houses and neighbourhoods are going to be constructed. Eleven percent of carbon emissions globally are as a result of embodied carbon. Upfront embodied carbon refers to the emissions associated with all the activities of procuring, mining, harvesting raw materials, transforming these materials into construction products, transporting them to site and incorporating them into a building, and subsequently maintaining, replacing and removing and disposing at the end of their life.

In Ireland currently there is no legislation on embodied carbon (the sum of all the greenhouse gas emissions (mostly carbon dioxide) resulting from the mining, harvesting, processing, manufacturing, transportation and installation of building materials). High carbon materials such as concrete and steel are the norm in the construction of housing in Ireland. Embodied carbon needs to be mentioned in this development plan and hopefully, in the next 5 years legislation will exist for embodied carbon. This is needed if we are to bring down emissions to a safe level. Last year emissions globally went down by 6.4 percent. To reach the Paris Agreement 1.5 degrees limit, we need to reduce emissions by 7.6 percent pa. Just observing how much society was closed down during the pandemic, in relation to travel and work really shows how much more effort and legislation needs to be in place to reduce the catastrophic effects of climate change. An important note for housing is how we can use existing building stock in SDCC and transform it into housing. A lot of this stock is owned by SDCC and the most sustainable building is the one that already exists.

We would again like to mention aspects on tree management concerning new development work as we did in chapter 4:

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## Chapter 7: Sustainable Movement

**Caibidil:** Volume 1: Written Statement » Chapter 7: Sustainable Movement

Figures from 2018 show that 1,410 people sadly lost their lives prematurely in Ireland due to poor air quality, with thousands more suffering from long term heart, lung, and brain conditions as a result. Vehicle emissions are a key contributor to this lack of clean air in Dublin. The recent progress made for pedestrian, cycling, and public transport routes has been positive, but still the vast majority of routes in SDCC continue to be favoured for private vehicles. This stands in the way of high capacity traffic solutions and sustainable movement. There are several areas in the urban centres of SDCC's villages and larger settlements which could be pedestrianised, while still allowing a cycle lane and disability access.

In relation to sustainable transport, the following should be at the core of planning and development:

- Introduction of 30km speed limits in SDCC. It is the quickest and cheapest way to make our streets and roads safer for cyclists and pedestrians of all ages and to reduce carbon emissions. This is an essential development aspect in the face of increased cyclist deaths last year and a surge in pedestrians and cyclists on our roads due to Covid19.
- More cycle parking for bikes and cargo bikes both outdoors and indoors (floor of a multi storey car park in Tallaght) to facilitate and encourage increased cycling.
- Complete electrification of the Dublin Bus fleet as soon as possible.
- Extension of the bike to work scheme to a "bike for all" scheme which includes electric bikes and allows anyone to participate e.g. a grant (the same as the bike to work scheme but you would not be indebted to your employer). This would allow more people to travel by bike thus encouraging reduction of air pollution, carbon emissions and traffic congestion.
- The number of air quality monitoring devices in SDCC is far from adequate. This needs to be significantly increased, especially in congestion blackspots.
- Development design and planning in and around parks should encourage park users to travel to the park in more sustainable ways. For example ensuring the provision of safe, wide footpaths for pedestrians; sustainable public transport links; implementation of safe and sustainable cycling infrastructure; facilitation of cycling within and through parks e.g. remove kissing gates etc. that impede cyclists, especially cargo bikes

and cyclists with a disability.

- Development of cycling and pedestrian infrastructure for sustainable movement should include plentiful planting of varied and native trees and / or hedges along busy roads to act as carbon filters to help protect pedestrians and cyclists from air pollution. Trees can improve air quality in direct and indirect ways. They filter atmospheric pollutants like sulphur dioxide, nitrogen dioxide and particulate matter.
  - Dublin Friends of the Earth strongly advocates for and encourages the implementation of a public awareness and education campaign to tackle the issue of engine idling which contributes negatively to our carbon emissions. Research has shown that engine idling “in a car creates worse emissions than driving” (Irish Times, January 2021). Idling is especially significant around schools, near shops, in car parks and in multi-storey car parks.
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## Chapter 8: Community Infrastructure and Open Space

**Caibidil:** Volume 1: Written Statement » Chapter 8: Community Infrastructure and Open Space

Again we are happy to see that the plan wishes to promote the concept of the ‘10 minute settlement’ in SDCC. A very frequent and reliable public transport system and active travel options are crucial also.

Our public parks need to be made more suitable for increased outdoor living due to the pandemic. Could we have more wildflower areas, more seating, picnic tables, covered areas to shelter from rain/sun, outdoor facilities for schooling, camps, classes, performances, water refill stations, better bike parking, zero waste markets, extended hours in the winter with better lighting, more water features, ponds for wildlife, more natural play areas for children (mini-forests, sand pits)?

We would like SDCC to seriously consider facilitating activity in open spaces e.g. in housing estates, current waste ground and sections of our parks. Could patches be given over to community groups to trial community vegetable gardens/GIY initiatives or mini allotments? This is a great hobby which produces healthy food, reduces carbon (flight miles/shopping) brings neighbours together, is a learning experience and gets people outdoors.

And in general, we need considerably more native tree planting wherever possible. We submitted separately to your draft Tree Management Policy document in this regard in August 2021.

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## Chapter 11: Infrastructure and Environmental Services

**Caibidil:** Volume 1: Written Statement » Chapter 11: Infrastructure and Environmental Serv...

We believe our previous comments on tree / hedge management are also relevant here, having mentioned them in chapters 4 and 6 previously.

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**Documents Attached:** Níl

**Teorainneacha Gafa ar an léarscáil:** Níl