

Uimhir Thagarta Uathúil: FIN-C453-1081

Údar: Sarah-Jane Cullinane

Stádas: Submitted

Aighneacht:

Sustainable Skerries submission to the Draft FDP May 2022

Comhairliúchán:

Draft Fingal County Development Plan 2023-2029

---

## Chapter 5: Climate Action

Caibidil: Section 1: Written Statement» Chapter 5: Climate Action

The Fingal Local Development plan outlines its objectives for the 2023-2029 period in Chapter 5. The section deals with both the mitigation and adaptation to the impacts of climate change. Over the course of this chapter, transport, energy, resource management and waste are categorised as mitigation while flood defence and nature-based solutions are considered adaptation. The development plan outlines some measures that are very welcome such as the Climate Action Energy Statement (pg. 186) and plans to add green spaces to Fingal County Council owned buildings where appropriate are applaudable (pg. 186).

It is clear from the development plan that climate change has taken centre stage and that the scale of the challenge ahead is becoming clear to the council and the public more broadly. However, the development plan has flaws in both its communication and implementation. We consider that for this development plan to have the necessary impact in the mitigation and adaptation of climate change these must be addressed. However, given the context of climate change, the impacts on society, economy and security the measures described here provide insufficient urgency and the council must seek to support to the public to make the necessary transition to a low carbon society

These include:

### 1. Lack of **clear targets and timelines**

For the public and business community to transition to a low carbon resilient society it must have a **clear schedule indicating regulation changes and incentive availability**. Fingal has proposed many changes but have not provided clear timelines or appropriate detail:

- 40% reduction in GHG emissions of the council. Without information regarding the emissions from the council it is unclear whether this emission reduction is the best place to invest. Does this represent a significant amount of Fingal's overall emissions? Nationally, emissions from energy, transport and agriculture are the largest emission sources.
- Fingal aims to make Dublin a climate resilient region, by reducing the impacts of future climate change-related events (pg. 179) again provides no details on what the actions are.
- Compact and Sustainable Settlement Patterns (pg.184) fails to provide any quantifiable targets. The public, NGO's and business community need to know what supports Fingal will put in place to promote renewables, home insulation and how will they address fuel poverty and transition away from solid fuels.

- Section 5.5.2.1 Climate Mitigation Actions for Buildings pg. 185 also provides no quantifiable targets or deadlines
  - Section 5.5.3 Energy provided only an overview of options. More quantifiable targets required. How will Fingal promote transition to renewables? What are its targets? How will Fingal support residents to transition? Will Fingal support community energy projects, access to grid and grants for retrofitting?
1. References to rewilding (in other chapters) ignore that these projects can both promote or hinder carbon sequestration. In certain circumstances, regenerative agricultural practices such as mob grazing can be more effective for biodiversity and carbon sequestration than simply leaving the area to itself for "rewilding". Additionally, rewilding as a term is not scientific or sufficiently specific. We recommend that Fingal **outlines areas that are currently under conservation and specify how it intends to nominate further areas for protection**. Additionally, where degraded ecosystems exist, we recommend identifying them (e.g. riverine systems/salt marshes/dune systems) and **setting tangible targets** for the number of hectares to restored, what that restoration process will achieve (e.g. carbon sequestration/habitat creation) and timelines for completion. Ideally, Fingal can provide mechanisms for public/private and community-based partnerships to complete these works in the aim of informing and driving climate ambition.
  
  1. Fingal has proposed no funding opportunities for business sector, Non-Governmental Organisations or research and innovation funding. To promote the green economy and the transition to low carbon technologies, opportunities and funding for innovation need to be provided and clearly articulated. One of the major challenges for NGO's and the commercial sector is start-up funding and capital costs. If Fingal County Council aims to promote the adoption of climate solutions, then funding should be made available. For instance, LIFE projects require upfront funding and public/private partnerships could attain this project with the local authority acting as funder. This would create employment, provide demonstration projects and enable Fingal to meet key milestones in its transition to a low carbon society. **Funding opportunities for business sector, Non-Governmental Organisations or research and innovation funding** should be included within the plan.
  
  1. The development plan states that better land-use management should be responsible for 26% of total carbon dioxide emission reductions over the period 2021 to 2030. As Fingal is predominately arable land, Nitrous Oxide (N<sub>2</sub>O) emissions are likely to dominate the GHG emissions from soil. Further, Chapter 5 makes little reference to agriculture while the council has a significant role in planning and enforcement of agricultural activity. Given Fingal's land cover is predominately agricultural, **pathways to improving farming methods, in particular encouraging farmers to move towards farming with nature, organic farming, and regenerative farming, reducing intensification, and reclaiming and restoring agricultural land** should be provided.
  
  1. Fingal proposes to use Nature-Based Solutions and Green Infrastructure to restore and connect habitats that are rich in biodiversity that provide valuable ecosystem services. We believe this is a good idea however the **trade-offs between biodiversity and GHG emissions need to be properly investigated**. For instance, species rich grasslands can often be net GHG emission sources.

1. Coastal management in Fingal is a significant opportunity. Coastal areas particularly salt marches, sea grass habitats and kelp dominated habitats are often significant sinks. However, activities like razor clam dredging and eutrophication can alter these habitats from sink to source. **Understanding, protecting, and restoring coastal areas** such these areas should be a priority for Fingal.

In summary, we believe that many of the ideas articulated in the Fingal Development Plan represent progress in mitigating and adapting to climate change. However, the lack of **clear targets and timeframes** means that the progress made over the period cannot be measured nor can the public plan for these changes. Additionally, failure to address **emissions from agriculture and land-use change** mean that meaningfully mitigating emissions from Fingal cannot be achieved. Finally, references in other chapters to rewilding are ambiguous. Fingal should **clearly identify conservation plans** (seeking to protect existing ecosystems) and identify clearly where restoration is required and set targets (number of hectares per ecosystem) and deadlines for completion. In addition, these projects should be public enabled for public private and community based partnerships. Finally, by seeking to **restore habitats that have high carbon storage capacity** (such as wetlands, organic soils, sea grass meadows) this plan would allow Fingal to capitalise on its carbon sequestration potential in the council's boundaries.

---

**Documents Attached:** Níl