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Submission to the Fingal County Development Plan

Cllr Karen Power

To whom it may concern

Please see below my observations in relation to the Draft Fingal County Council Development Plan.

Best wishes,

Karen

Climate

The Development Plan, in line with legislation and national policy correctly addresses the overall framework for climate change adaptation. However, more needs to be done to make that commitment real in practice.

The policy context on pages 182 and 184 should be updated to reflect the increased ambition in the Climate Action Plan 2021 published on 4 November 2021.

There should be incorporation into all planning decisions of considerations of upfront (embodied) and operational emissions.

The county faces serious challenges in the area of coastal erosion and as a Council we should be focusing on nature based solutions for coastal challenges; co-benefits of any defensive infrastructure/measures including maximising biodiversity (e.g. Bioblocks, renewable energy

A lack of clear targets and timelines for tackling climate change is a concern. 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. The draft development plan proposes many changes but does not provide 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?

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 (N₂O) 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, reducing intensification, and reclaiming and restoring agricultural land should be provided.

Biodiversity

There are huge opportunities in Fingal to use public lands, and promote government biodiversity schemes on private lands, to restore appropriate habitats in the county particularly woodlands (including agroforestry), wetlands, grasslands and hedgerows. Tree planting should be carried out with the aim of restoring functioning woodland ecosystems, an opportunity often lost by open parkland tree-planting. In all cases lands will have their past land-use histories to take into account in determining the most appropriate restoration objective.

When it comes to open space, the plan often refers to 'biodiversity areas', with the sense that these are to be separate zones. While, as described above, these are essential to begin to restore nature in our county, the opportunities to embed biodiversity in all areas of open-space development should not be lost e.g. landscaping, soil health, green roofs/walls, SUDS, soil banks, natural materials, integrated or artificial habitats. While some of these are mentioned in other parts of the plan, an open space objective that clearly seeks to integrate biodiversity in all use-areas and sets targets for same would be welcome.

References to rewilding throughout the draft development plan ignores that these projects can promote or hinder carbon sequestration. This needs to take centre stage in Chapter 5. Additionally, rewilding as a term is not scientific or sufficiently specific.

Within the draft development plan it is proposed to use Nature-Based Solutions and Green Infrastructure to restore and connect habitats that are rich in biodiversity that provide valuable ecosystem services. This is warmly welcomed, however there are often trade-offs between biodiversity and GHG emissions. These need to be properly investigated. For instance, species rich grasslands can often be net GHG emission sources.

Transport

Amend Objective SPQHO2 to read:

Prioritises sustainable active transport modes (by providing safer cycle lanes and community public transport services (particularly when the concept of a 15 minute town is not viable) that meet the needs of its residents, particularly when no provision has been made for new shops and schools close to the new housing developments)

Accessibility, adaptability and inclusivity

I welcome the commitment of the Council to aim for 30% universal design in social housing stock.

I welcome the inclusion of "all gender and none" in terms of making our public spaces more inclusive

An Access Officer should be employed full time by the council to assess developments, public buildings and spaces to make sure that they are accessible to all.

Priority should be given to accessible spaces, elderly spaces, hidden disability spaces and shared car spaces, over standard parking spaces in our towns and villages.

New public toilets should be gender neutral. The council should promote making existing public toilets gender neutral.

Community infrastructure and open space

I welcome the objective of aiming for more multi-use buildings and would ask that consideration be given to providing / sourcing a building for the 89th Bremore Scout Group, Balbriggan Volleyball Club, and Fingal Rowing Club, that would also be available to other community groups as the need arises.

The Fingal area is significantly underserved for athletics facilities, with just one track (ALSAA) for c300,000 citizens, compared with 3 in Dun Laoghaire/Rathdown, 8 in the Dublin Corporation area, 3 in Meath, 2 in Louth etc. The development plan should support the development of the sport in Fingal which would also provide assets to the wider community.

I welcome the increase in target minimum open space to 18%. The focus on target open space should be set to the European Average and the concept of locked or inaccessible community spaces should not be permitted.

The Zoning Matrix for High Amenity lands in the Draft Development Plan outlines the uses that are "permitted in principle" including Guest Houses, Campsites, Holiday Home Apartments and Restaurant Cafés. This allows for appropriate uses in sensitive landscapes to be considered "in recognition of the amenity potential of these areas to increase public access".

The insertion of "campsites" to objective GIN H055 in the Draft Plan, conflicts with the Zoning Matrix and should therefore be removed.

Employment and the economy

The draft development plan makes continuous reference to sustainable growth, green and circular economy, but it still is presented as one which prioritises economic growth above all else. This should be reframed.

The draft plan aims to create "high quality employment that is well paid and sustainable" yet puts this primarily in the context of office work in industrial parks with minimal mention of employment which serves the community - food growth, sales and distribution, childcare, elderly care, healthcare, education and other public services.

The draft plan also frequently refers to the high level of education in the area in terms of University degrees yet does not address the relevant skills required by the population to meet targets for building and retrofitting homes in the area for the coming years to meet climate targets. This is particularly relevant given the commitments within the PfG for retrofitting, the Governments Housing for All Plan and the Climate Action Plan. The draft plan also makes very little reference to how sustainable employment in public transport (and the required skills) can keep up with increasing demand and meeting our climate targets.