

**Response to public consultation
on
Fingal County Council Draft Development Plan 2017-2023
and
Strategic Environmental Assessment**

1. Sustainable development

The Development Plan, in line with legislation and national policy takes sustainable development as the overall context for the plan (pp.14-15). However, more needs to be done to make that commitment real in practice. The Strategic Environmental Assessment process should help with this by making clear the impacts of the plan. However, the SEA report does not do that, a point to which I will return.

Overall the Plan needs a revision to bring it more into line with a sustainable development analysis.

2. Climate Change Adaptation

The discussion of climate change correctly addresses the overall framework for climate change adaptation. However, it fails to get to grips with the difficult policy choices required particularly to deal with coastal flooding and erosion and fluvial and pluvial flooding. This area needs more attention in the Development Plan.

For example, the current application of SUDS by the Council requires that runoff is limited to existing runoff levels. There are instances where this is insufficient to deal with existing unacceptable flooding risks, not to mind the increased flooding risk which climate change is bringing. Similarly the issue of when it is more appropriate to protect from or yield to the impacts of sea level rise is not considered.

3. Climate Change Mitigation

The discussion of climate change mitigation does not engage with the extent of the challenge we face. The SEA which should inform the policy in the draft plan is out of date, being written before the enactment of the Climate Action and Low Carbon Development Act and the Paris Agreement. Its inadequacy however is much deeper. The SEA should consider the Paris Agreement target of 1.5°C above pre-industrial temperature, and both national and EU 2050 transition goals, and then explore to what degree the Draft Plan will put the County on the necessary trajectory.

The emissions analysis required could and should have been done and included in the SEA. As the SEA itself notes, Dublin City Council and South Dublin County Council carried out similar analyses in 2010 as part of their Sustainable Energy Action Plans (http://www.covenantofmayors.eu/about/signatories_en.html?city_id=242&seap, http://www.covenantofmayors.eu/about/signatories_en.html?city_id=4523&seap)

I hope the correct analysis will be done as part of the next stage of the Development Plan process. I expect that it will find that Fingal is far off the necessary trajectory.

Fundamental changes in policy and practice are required during the lifespan of the 2017 to 2023 Development Plan. Climate change should be at the centre of the Development Plan including providing that new suburban areas are built as low carbon / zero carbon zones as in the case of city suburbs in Germany and Sweden.

This Draft Plan does not incorporate the necessary changes in direction; the challenge for Fingal County Council now is to make the necessary amendments.

These amendments should also include

- the setting of targets for emissions reduction from the County along a trajectory over the lifetime of the Plan;
- provisions for reporting on progress in reducing emissions; and
- a process of engagement with citizens, businesses and civil society in relation to the changes required.

4. Transport

Here again, the SEA should have helped to inform the draft but has not. Unfortunately, the SEA refers to the goals of national policy as set out in Smarter Travel but it does not set out the targets which Smarter Travel laid down. These are

- "Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services;
- "500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;
- "Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;
- "The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;
- "A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector."
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Fingal's Development Plan should be tested against these targets.

As with the analysis of greenhouse gas emissions, the results would not be good. The transport proposals contained in the Draft Development Plan will not drive the necessary shift to walking cycling and public transport, but will instead facilitate an increase in total car kilometres contrary to Smarter Travel, and fail to meet the modal shift targets in Smarter Travel, leading to an increase and not a reduction in ghg emissions from the sector.

5. Road proposals, particularly East-West road and Moyne Road bypass

The road proposals contained in the plan need to be fundamentally rethought. The commitments to road-building would exacerbate the failure to meet the Smarter Travel goals.

The proposed new East-West road in South Fingal is based on the South Fingal Transport Study Final Report which fails to engage properly with the public transport needs of the

areas. It identified the need for an east-west public transport route but did not study it, instead recommending that such a study be done. (To the best of my knowledge it has not been done.) It is however, based on an assumption that Metro North and the Dart Interconnector will not be delivered by 2025.

It predicts that the new road will take traffic from the M50 motorway and sees this as a positive feature.

This proposal for additional east-west road capacity to alleviate traffic on the motorway is being proposed in circumstances where An Bord Pleanála determined that traffic demand on the motorway should be managed. The relevant condition, possibly rather ineffectively worded, read:

“A scheme of specific demand management measures for the M50 motorway corridor shall be published by the relevant road authorities not later than three years after the M50 Motorway Upgrade Scheme has been completed.”

The report was produced in 2014.

<http://www.dlrcoco.ie/aboutus/councildepartments/transportation/downloadit/m50demandmanagementreport/>

It listed 5 demand management measures, none of which has yet been implemented. To the best of my knowledge there is no plan to implement any of them. So in the absence of any concrete demand management in line with An Bord Pleanála's condition and in the absence of any steps to meet demand with public transport, the draft Development Plan includes a road proposal which will facilitate increased car use, clearly contrary to the goals of Smarter Travel.

The proposal does not in any way match up with the requirements of Smarter Travel to achieve modal shift. The induced traffic which would result from the road-oriented approach further undermines the Smarter Travel goals. The options of dedicated routes for public transport, cycling and walking have not even been analysed.

The proposed road bypassing the Moyne Road would have a devastating impact on the greenbelt and the Racecourse Park in Baldoyle, visually severing the greenbelt, and causing far more noise. The existing Moyne Road should be upgraded instead.

6 Development stimulating car use

A minimum requirement for achieving modal shift is the prioritisation of walking, cycling and public transport. This includes prioritising access by people using these modes to the entry of developments. One example is providing a direct, safe, convenient and comfortable route from the public footpath or bus stop to the entrance to a shop, instead of requiring pedestrians to walk across a busy carpark. Another is banning the practice of 'drive-through' retail. Objectives to provide that Fingal will require the prioritisation of access by the desired modes and refuse car-oriented development such as drive-throughs should be included.

7. Cycling

The plan reproduces a large network of cycle routes found in the current plan on which very little progress has been made during the course of the plan. It should commit to completion of the majority of the routes within the lifetime of the plan, with the routes to be completed identified individually.

Additionally, it should commit to the Principles of Sustainable Safety as set out at http://www.swov.nl/rapport/Factsheets/UK/FS_Sustainable_Safety_principles.pdf, and referred to in the National Cycle Manual, as a policy foundation to achieve better design standards than are currently visible in cycle facilities throughout the County.

8. Aviation.

The draft Objective ED30 reads:

"Ensure that the required infrastructure and facilities are provided at Dublin Airport so that the aviation sector can develop further and operate to its maximum sustainable potential, whilst taking into account the impact on local residential areas, and any negative impact such proposed developments may have on the sustainability of similar existing developments in the surrounding area."

This text resulted from a recommendation in the SEA that the phrase "maximum potential" be replaced with "maximum sustainable potential".

This change while positive raises a fundamental question as to what it means. What is the "maximum sustainable potential" of an airport in circumstances where, if unchecked, aviation emissions are predicted to increase by 300% to 2050, (http://www.icao.int/environmental-protection/GIACC/Giacc-4/CENV_GIACC4_IP1_IP2%20IP3.pdf) and there is a global target to keep global warming within 1.5 degrees above pre-industrial levels?

Increased capacity at Dublin Airport is not consistent with the decarbonisation trajectory set out in the Paris Agreement.

9. Built environment

The draft Objective to "promote energy efficiency and conservation above Building Regulations standards" (PM24) is very welcome.

It should be given more concrete form as a commitment to require new buildings to meet Passive House standards where possible as has been done in Dún Laoghaire Rathdown and is proposed in Dublin City.

It should also require higher standards of materials sustainability including embodied carbon emissions, according to assessment methodologies such as BREEAM and LEED and relying on Environmental Product Declarations.

While Fingal County Council led the way with what became known as the Fingal Energy Standard in a number of Local Area Plans from 2006, other counties have caught up and

are requiring the Passive House standard be met where possible. The challenge now is to effectively implement these near zero carbon targets.

One essential aspect of these higher standards which does not get enough attention is their significant contribution to indoor air quality; indeed the economic value of the public health benefit may be greater than the energy savings or emissions reductions.

10. Renewable Energy

The Council must take much stronger steps to promote renewable energy. Recent examples include the requirement recently enacted in San Francisco requiring new buildings to include solar panels (<http://www.csmonitor.com/Environment/2016/0420/San-Francisco-to-become-first-city-to-require-solar-panels-on-new-buildings>) or the requirement introduced in France last year that new commercial buildings must have either green roofs or solar panels. (<http://www.theguardian.com/world/2015/mar/20/france-decrees-new-rooftops-must-be-covered-in-plants-or-solar-panels>)

Similarly text on low carbon district heating needs to be a lot clearer. It should specify how the Council will promote district heating and in which circumstances. Possibly this could refer to the Local Authority Renewable Energy Strategy, but it would need to be clear that the Development Plan gives the policy basis for requiring district heating.

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