

Submission on Draft Climate Change Strategy for South Dublin County

by

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1. Light-Pollution and Greenhouse Gas Emissions

Council state:

"Public Lighting: There are 27,000 street lights under the control of the council which account for 58% of the total CO₂ emissions for council activities. The council has identified this area as a priority in reducing energy consumption and emissions. Several pilot dimming schemes have been initiated and a study is being conducted to assess the potential for retro fits, new energy efficient lamps and a tele monitoring software system. "

I request the Council to introduce Light Pollution regulations similar to those of Clare and Kerry County Councils. I request that such regulations incorporate the following:

- Planning permissions for all new housing developments to stipulate the use of Fully Cut-Off (FCO) light fittings for street lighting
- That the details of any external lighting scheme intended as part of any new development be submitted as part of the planning application; and that applicants be required to demonstrate that the lighting scheme proposed is the minimum needed for security and working purposes.
- Limits on light output from new housing and commercial developments
- Powers for the Council to direct property-owners to alter the fittings and/or alignment of misplaced and misdirected lights on private property.

I request that the Council adopt objectives to minimise Light Pollution, including objectives:

- For the phased conversion of non-FCO light fittings in all existing housing estates and commercial retail parks to FCO light fittings, across the entire South Dublin County Council administrative area.
- To protect "dark skies" and reduce the nuisance potential of over-lighting of developments.

I submit that such regulations would:

- Reduce unnecessary energy usage, thereby having the twofold effect of reducing costs to the Council *and* reducing greenhouse gas emissions
- Reducing glare, resulting in an increase in night-time visibility by appropriate direction of light, leading to increased security and safety
- Serve to remove a threat to those animals and plants that are negatively affected by exposure to artificial light
- Enable the general public to view and admire the night sky, which is as much part of our environmental and cultural heritage as our rivers, lakes,

mountains, parks and historical monuments.

2. Energy

Council state their proposed actions:

“Carry out a feasibility study on the implementation of a district-heating network in the South Dublin County Council area and developers will be approached on the benefits of district heating and encouraged to consider district heating for their developments.”

Rather than encourage developers, I submit that the Council should introduce new regulations to make it **mandatory** for developers to provide district heating networks in any planning applications where the number of housing units exceeds 500. These regulations should be framed in such a manner that if a developer applies for planning permission for less than 500 housing units on a portion of their zoned land, and later makes a second application also for less than 500 housing units on the remaining portion (or part thereof) of their zoned land, where the total number of housing units from both developments exceeds 500 numbered housing units, the developer shall be required to provide a district heating network for the total number of houses. These regulations should also require developers to incorporate sustainable and renewable energy technologies into all housing developments, regardless of size of the development.

3. Transport

3.1. Pedestrian Facilities

Council state that actions under this heading:

“Pedestrian: South Dublin County Planners have prepared green routes throughout the County, such as Griffeen Valley Park, Lucan to encourage walking and cycling”

I submit that the Council needs to move away from the idea that pedestrian facilities should be provided chiefly for leisure purposes. I submit that the Council needs to shift its mindset in relation to the provision of pedestrian facilities for residents of the County to be able to go about their daily business using walking as a primary means of transport. In that context, I submit that the Council must move away from the “Pedestrian Warrant” system they currently use in providing pedestrian crossings, whereby the Council currently only provide such crossings if the number of pedestrians counted attempting to cross a busy road exceeds a particular warrant. I submit that the Council needs to be pro-active rather than reactive, and should provide pedestrian crossings at strategic locations irrespective of pedestrian counts. I submit that this will ultimately lead to a “walking culture” by residents in the County.

3.2. Cycling Facilities

Council state under actions for this heading:

“Cycling: There is 141.12 km of cycle tracks in South Dublin County Council, which is comprised of 63.19 km on street; 27.38 km adjacent to carriageway and 27.38 off road. A further 40 km is planned.”

I submit that, while the cycle network within the Lucan area in particular has improved greatly in recent years, there are a number of design aspects, of off-road cycle tracks, which need addressing, which would encourage people to cycle. Therefore, I request the Council to introduce regulations/provisions for the upgrade of the existing cycle track network, to include:

- The removal of concrete kerbing on off-road cycle tracks at junctions with the road network, as these pose a hazard and inconvenience for cyclists, and are in fact completely unnecessary.
- The modification of 90 degree access-points for off-road cycle tracks to with-flow access, in the same manner as the eastbound and westbound off-road cycle track access points on Griffeen Avenue, on the western side of the Outer-Ring Road Balgaddy junction
- The provision of ramps/raised cycle track where such tracks cross estate-entrances similar to those provided for in the Celbridge Cycle Track scheme (near Crodaun Forest Park Estate) with accompanying clear signage for traffic exiting estates warning of approaching cyclists.
- The provision of more on- and off-road cycle tracks, particularly to and from Lucan Village and between Lucan and Palmerstown.
- The provision of cycle-parking facilities in all retail parks in the area (for e.g.: there are no cycle-parking facilities in Liffey Valley retail park).

3.3. Motorised Transport: Electric Cars, Motorcycles/Scooters and Bicycles

The Council does not make any reference to Government policy in relation to increasing the number of electric vehicles on Irish roads. I submit that such policy requires the cooperation of local authorities in the provision of recharging points/stations. Therefore, I submit that the Council should as part of its Climate Change strategy, adopt a plan to implement recharging stations throughout the County so as to encourage the sale of electric vehicles (cars and motorcycles/scooters) and electric bicycles.

Ends