



27th October, 2023

By Email

Dear Mayor Henchy, Dear Ms Farrelly,

Fingal County Council Climate Draft Climate Action Plan (hereafter “the Plan”)

Thank you for the opportunity to submit our comments on the Plan. I am responding on behalf of the group established within the Parish of Donabate, Portrane and Balheary with a goal of helping to achieve Pope Francis’ ecological vision in our parish and wider community.

Pope Francis recently published his encyclical “Laudate Deum” which was a follow up to his 2015 encyclical “Laudato Si” concerning care for our common home. The Holy Father noted in Laudate Deum that he had “realised that our responses (to climate change) have not been adequate, while the world in which we live is collapsing and may be nearing the breaking point”. The language used here conveys and underlines the importance and extreme urgency of the issues being considered in the Plan. We are making our comments on the Plan with the gravity of this matter at the forefront of our minds. Our comments are as follows:

Green House Gas Emission Reduction

We welcome the Plan’s goal to reduce Fingal County Council’s GHG emissions from 8,683,676 Kg CO₂ per annum to just under 4,000,000 KgCO₂ per annum by 2030. We note, however, that most of this planned reduction (just over 4,000,000 kgCO₂ per annum) would appear to arise from and be dependent on, a transition by the national grid away from carbon intensive fuel sources to more renewable sources of energy. Although we note that Ireland’s Climate Action Plan (2021-2030) has set a target for electricity generation from renewables at 70%, the proposed reduction in CO₂ emission in the Plan is almost entirely outside of Fingal’s control and is dependent on this target being met nationally. It is unclear to us from the Plan what concrete objectives and plans Fingal has to source its energy directly from direct investments in renewable energy sources. Perhaps further consideration could be given in the Plan to this critical issue.



The Plan notes that over 13 percent of GHG emissions by the commercial sector in Fingal is accounted for by data centres. It further notes that data centres and other large industrial sites should meet their energy requirements through on site renewables and renewable power purchase agreements. It is unclear from the plan whether Fingal will make this a condition in any new planning permission that is given for such facilities. We would be grateful if that could also be clarified in the Plan.

Public Transport

Ireland is the second most car dependent country in Europe. As the Plan points out transport is the biggest contributor to GHG emissions in Fingal accounting for a total of 45% of all emissions. The 2022 census revealed that in Fingal approximately 50% of journeys to work, school or college were made either as a car driver or as a passenger in a car.

We note Fingal's emphasis in the Plan on a conversion to active travel in order to address this problem. We particularly welcome the recent commencement of the work on the Broadmeadow Greenway that will connect our communities with those in Malahide. It is particularly laudable that this work will be undertaken in such a way as to not damage the habitat of migratory birds. Notwithstanding this, it is clear that active travel is not the solution for the many people in our communities who have to journey into the City Centre or along the M50 corridor in order to attend their workplaces. Their choices reduce to public transport or a car journey. Unfortunately, too often the experience of commuters with public transport in our communities (where it is even available) is that it is not reliable, not clean and furthermore does not always feel safe. Pope Francis notes in *Laudato Si'* that "Many specialists agree on the need to give priority to public transportation.". Whilst we appreciate that Fingal is not responsible for public transport, we encourage Fingal to continue to emphasise the importance of advocating for and facilitating key strategic public transport initiatives as well as advocating for the improvement of the existing public transport experience for our commuters who all deserve better.



Biodiversity

The Holy Father states in *Laudato Si'* that “Each year sees the disappearance of thousands of plant and animal species which we will never know. The great majority become extinct for reasons related to human activity. Because of us, thousands of species will no longer give glory to God by their existence, nor convey their message to us. We have no such right.”. We commend Fingal on its plans for nature based solutions to climate change. It is unclear to us from the Plan however how Fingal uses and plans to use pesticides and weed killers in its parks, golf courses and other public spaces. Both products can have severe implications for biodiversity and we would welcome clarity on their current and future use in the Plan.

Community Involvement

In *Laudato Deum* Pope Francis recognises the importance of individuals and community involvement in caring for our common home. He points to “the need to realise that there are no lasting changes without cultural changes, without a maturing of lifestyles and conviction within societies, and that there are no cultural changes without personal changes.” We welcome Fingal’s efforts in the Plan to involve the wider community in this important work. We have been pleased, for example, to participate in the climate adaptation and mitigation education sessions that have been run by Global Action Plan in conjunction with Fingal County Council. We have also made contact with Fingal’s Community Climate Action Officer and look forward to receiving their ideas and support to assist in the execution of the initial Ecological Action Plan that has been adopted by our Parish.

Thank you in advance for considering our comments.

Yours sincerely

John Keogh