



Submission to the Public Consultation on Wicklow County Council Draft Climate Change Adaption Strategy – July 2019

1. Wicklow Uplands Council:

Wicklow Uplands Council (WUC) is an independent voluntary organisation which represents over 50 diverse member groups and individuals in the Wicklow Uplands. WUC works to support the sustainable use of the Wicklow Uplands through consensus and partnership with those who live, work and recreate there. The Uplands Council believes that the people who live, work and enjoy the Uplands must be provided with opportunities to participate in the various local, regional and national decision making processes affecting the area.

2. Introduction:

WUC welcomes the Draft Climate Adaption Strategy and the opportunity to submit its views. WUC would like to commend Wicklow County Council on its proactive approach and being the first local authority in the country to declare a Climate and Biodiversity Emergency. As an organisation that represents the Wicklow Uplands, we are most concerned about the impacts that climate change will have in those areas of the county. The uplands and associated communities are the most rural and isolated in County Wicklow and are therefore are most likely to be the most affected by the worst effects of climate change e.g. snowfall, wildfire, drought.

While the strategy is a welcome development it is largely related to how Wicklow County Council as an organisation, can adapt to climate change in its operations. While this is not a negative thing, WUC suggests the value of a climate adaption plan for the entire county which would require input from the various key stakeholders in the county i.e. Coillte, NPWS, IFA, An Garda, ESB, National Transport Authority, community groups etc.

3. Wicklow Uplands:

The Wicklow Uplands are the largest contiguous upland area in the country and are an important source of source of food, water and energy (electricity and timber). In addition, healthy upland habitats store carbon and slow floodwaters, preventing downstream flooding. Therefore the uplands play a crucial role in any climate adaption or mitigation strategy. In Ireland, 53% of all soil carbon is stored in peatlands found in the uplands; this represents just 16% of the land area¹. While it is the NPWS and upland farmers who are managing these areas, WUC suggests that Wicklow County Council supports their management where possible, given the significant role the uplands can play in meeting national climate targets.

4. Consultation on the Review of the Draft Climate Change Adaption Strategy

¹ Tomlinson, T. W. (2005). Soil carbon stocks and changes in the Republic of Ireland. In: *Journal of Environmental Management*. **76**. 77 - 93

WUC fully supports the vision to reduce the impacts of future climate change related events and make Wicklow a climate resilient county. We wish to comment on the strategy under its various headings.

4.1 Adaption vs Mitigation

As defined in the strategy, 'Climate Mitigation' seeks to prevent climate change while 'Climate Adaption' seeks to respond to the impacts of climate change. WUC acknowledges that there is some mitigation measures included in the draft strategy. However, we suggest that there needs to be a greater focus on mitigation which would support a preventive approach rather than focusing on adapting to the worst impacts of climate change. The successful implementation of mitigation measures will also be important in the transition to a more low carbon and environmentally sustainable economy, as set out in the Governments Climate Action Plan 2019.

4.2 Mitigation

As above, the strategy briefly sets out the mitigation activities that Wicklow County Council, as an organisation, will carry out. The plan also briefly mentions the development of Sustainable Energy Communities (SECs) in the County. Supporting these SECs will be very significant in supporting climate mitigation at a community level. WUC suggests that Wicklow County Council provide ongoing support, for example; training, advice or grant support, to these SECs to ensure their success. WUC also suggests that a portion of the annual Community Grants Scheme be prioritised for climate related or energy saving projects

4.3 Demography and Socio-economics

The strategy recognises that a high proportion of Wicklow residents commute outside of the county for employment. The lack of public transport in Wicklow means that commuters are heavily reliant on their cars. A better public transport network in the county would support the Council's aim of a modal shift towards sustainable transport and greatly reduce carbon emissions.

The plan does not specifically refer to the lack of broadband and mobile phone signal in many areas of upland and rural Wicklow. This lack of such critical infrastructure means that rural enterprise and working from home is not a possibility in many cases. Supporting the development of this network would provide greater opportunities within the county and further reduce car commutes.

4.4. Assets and Infrastructure:

As mentioned above, there is a significant lack of public transport services in the County. WUC recognises that this is largely the role of National Transport Authority, however better public transport services throughout the county, and in particular links across the county, are vital. This would reduce car dependency for commuters. It would also provide greater opportunities for visitors without cars.

There is no mention in the strategy of charging points for electric vehicles (EVs). As the Government is promoting the shift to EVs there needs to be significant investment in electric charging points right around the county in all towns and villages, not just in larger towns.

The strategy refers to the 'growing renewable energy sector with wind energy'. While WUC fully supports renewable energy there is concern that South Wicklow in particular, is being targeted for the development of industrial scale wind farms. These developments are having an impact on the local residents and the communities in South Wicklow. WUC believe that it is important to utilise all renewable energy sources sited and planned in accordance with sensible relevant policies and guidelines.² All developments, and in particular wind energy developments, should take full cognisance of environmental and aesthetic impact on the landscape. However, further onshore wind developments should be delayed until the new Government Policy on Wind Energy Guidelines has been published. WUC would also remind Wicklow County Council that there are other renewable energy sources such as water power, solar photovoltaic and biogas that may be less obtrusive and cause less environmental damage during and upon installation.

4.5 Case Studies:

WUC would like to comment specifically on Case Study 3; Heat Wave and Drought Summer 2018. The heatwave resulted in a number of devastating wildfires taking hold in the uplands. Given the predicted increase in temperatures it is very likely that we will witness more fires like these. One of the main reasons for these wildfires is the accumulation of mature vegetation. This is in part due to current restrictive legislation which only allows landowners to use controlled burning as a means to manage excess vegetation, from September 1st to February 28th/29th. Traditionally, upland farmers used controlled burning to manage vegetation in March when weather conditions were more conducive but before vegetation is too dry. This practice created firebreaks, prevented the spread of wildfire and supported upland biodiversity. The current legislation has seen a rise in the extent and frequency of uncontrolled wildfire in the uplands. WUC has lobbied successive governments to extend the current season to allow for controlled managed burning within a realistic timeframe. Effective vegetation management in the uplands should be an important climate adaption action.

The environmental damage of wildfires apart from the cost of putting them out and protecting lives and property, is not always understood. The air pollution with increased carbon dioxide, dioxins and other hazardous chemicals together with particulate matter is obvious health hazard, but the burning releases the sequestered carbon from the burnt peat layers that then are eroded sometimes down to the level of the subsoil. As Wicklow is the water catchment area for much of Leinster, the increased turbidity of the water caused by erosion is a significant cost factor in the production of drinking water.

4.6 Climate Risk Identification

WUC would like to highlight there is erosion and scarring frequently caused by wildfires. In addition, erosion and scarring is already a feature along the many upland walking routes (4.1.20) due to the popularity of such routes. WUC and Mountaineering Ireland have identified over 100km of upland path which are currently impacted by erosion. As well as increasing the likelihood score, WUC suggests the impact score should also be increased. Damage to environmentally significant upland

² Wicklow Uplands Council, Renewable Energy Policy 2009

habitats should not be underestimated. In addition the poor condition of upland paths will deter returning visitors and could negatively impact the local economy.

4.7 Adaption Goals, Objectives and Actions

WUC welcomes objectives actions as set out. The appointment of a Climate Officer is a very positive step to ensure that the objectives and actions of this strategy are achieved.

WUC would like to comment specifically on Theme 6: Community Health and Well Being. As stated previously, upland communities are most likely to be affected by the worst effects of climate change in particular e.g. snow snows and wildfires. WUC advocates the need to build resilience within these communities and the implementation of mitigating actions to enhance preparedness.

5. Further comments

Overall the strategy is broadly welcomed by WUC. There is no mention within the strategy about the potential for the production of electricity on small scale or microgeneration within the county. Microgeneration offers huge potential for individuals, businesses and communities to become less dependent on the main grid for electricity. However, microgeneration has not been an attractive proposition as producers cannot sell back into the grid. This is a huge issue and while WUC appreciates that it outside of the remit of Wicklow County Council, all efforts must be made, by all stakeholders to lobby for this change.

Finally, it is worth noting there is growing fear about the impacts of climate change. Some of this fear is based on false truths. Wicklow County Council has an important role to play in ensuring that factual information about climate change is disseminated and freely available. WUC suggests that the Council take an active role in providing training for its staff and local representatives as well as running public events to ensure that this information is widely available throughout the county