

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday 8 February 2022 12:52  
**To:** CARBON BUDGET CONSULTATION  
**Subject:** Submission on carbon budgets

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First I would like to support the submission put in by Senator Alice-Mary Higgins.

[https://www.alicemaryhiggins.ie/news/post/public-consultation-on-carbon-budgets-closing-8th-february?fbclid=IwAR0dWb-7ynlJwzV4uSxjNR1\\_P1CoksMWrrjZNY28xtauwZqvxq6RPct88ouc](https://www.alicemaryhiggins.ie/news/post/public-consultation-on-carbon-budgets-closing-8th-february?fbclid=IwAR0dWb-7ynlJwzV4uSxjNR1_P1CoksMWrrjZNY28xtauwZqvxq6RPct88ouc)

Second. I would like to talk about what is happening in our local council, Wicklow, where there is a clear disconnect between what the council is claiming is its policy and what these two quotes from the planning report represent.

#### **De-carbonisation through protection of green infrastructure**

As far as I can see is that the Council have not factored de-carbonisation into conserving green infrastructure in planning.

Whilst I agree that actually doing the math on de-carbonisation through conserving nature is still in its infancy, and in Wicklow it clearly has not even begun, some things like conserving existing greenery and bogs are well known by now. The developers have got away with a tick-box exercise of planting another single tree to fulfill the 'no net loss of biodiversity' clause when they do not factor in carbon capture or habitat loss for species other than trees, and this must be changed as soon as possible.

I include an example below.

The following are quotes from the two Planning Reports in connection with development in Delgany.

#### **Planning Report Register Reference PRR 21/959 – page 28**

*"The proposal will see the loss of a large number of existing trees, within the site. The loss of trees it is considered cannot be avoided given the lands are zoned for residential development. However, such losses are offset by additional planting as set out in the landscaping proposals. It is considered therefore on balance the proposal is acceptable."*

Report signed by

#### **Planning Report Register Reference PRR 21/959 – page 23**

*"A number of objections have raised issues in relation to the loss of trees/ biodiversity/ impact on stream on . The lands are zoned for residential development and given such zoning the loss of greenfields and trees are inevitable."*

Report signed by

We make the following observation on the quotes above

Wicklow Co Co has received generous funding from Central Government to educate its staff on the Council's public and legal duty to play its part in delivering *"the objective of mitigating greenhouse gas*

*emissions and adapting to the effects of climate change in the State.”* The author of the comments above in the Planning Report either did not attend the expensive training or just does not understand.

The fact that land is zoned for development ~~should not~~ entitle a local authority to a grant planning permission that just discounts the local authority's legal duty to further the national climate objective. Mature trees are essential Nature based infrastructure and as such every bit as essential as roads and pipes.

Mature trees absorb water, prevent flooding, filter the air, store carbon. They save lives in heat waves because they provide shade and cooling in a Climate that is warming. They add value to homes because trees make places more resilient and livable. They lower our blood pressure and are far more important for children than gravel and swings. There are plenty of studies to show that even expensive roads last longer and require less maintenance if sheltered by mature trees. All this before we get to the role that mature trees play in the health of ecology, in the long-term sustainability of a stable ecosystem.

It takes a minimum of 30 years for new trees to grow to maturity. You cannot plant your way out of the carbon and biodiversity problem. You cannot compare the power and value of new trees with mature trees. Mature trees are critical natural infrastructure, an asset that does not depreciate.

You don't need to plant new trees. It is cheaper to keep what you have got. What you have got is more valuable, more ecologically diverse, storing more carbon.

### **Cutting down mature trees makes no sense from a carbon or biodiversity point of view.**

There is no loss for the owner of a site if they reduce the number of houses they would like to build in order to save a greater number of trees because he or she has not spent money creating the ecological value of the site. Nature did that. The sale price is simply a windfall gain bestowed on the site owner by the Planning decision to zone for development. The site is not even near a train station or any good bus links. Something similar is happening in Enniskerry, and they have plans to remove 50 trees in Greystones in the new Media Centre instead of building a multi-story car park to save a similar amount of land. The land will be used for parking 400 cars.

Sincerely

A large black rectangular redaction box covering the signature of the author.

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