



## **Draft Litter Management Plan 2016-2018**

### **DublinTown submission**

DublinTown is the Business Improvement District for Dublin City Centre. The organisation was provided with a mandate to represent the city centre's 2,500 businesses following a plebiscite of businesses in 2007. This mandate was renewed in 2012 following a second ballot. DublinTown welcomes the opportunity to make this submission in relation to the draft litter management plan.

#### **Introduction**

DublinTown welcomes the opportunity to make a submission on behalf of our membership in relation to the draft litter management plan 2016-18. A clean and presentable city is obviously an important factor in retaining customers to the city centre and as such is of great economic importance as well as being a matter of civic pride.

#### **Public Toilets**

Under section 4.11 of the 2008-2011 Plan, Dublin City Council committed to developing the city's public toilet infrastructure. While the provision of urinals in a small number of areas in the city at the weekends is beneficial, a proper new public toilet infrastructure is needed to ensure a cleaner city centre. We have long advocated for the introduction of staffed, well-maintained, pay-per-use public toilets in the city centre. During a recent external assessment for the renewal of the Creative Quarter's Purple Flag, failure to provide adequate public toilet facilities was noted.

We are disappointed to note that not only has the aim of the previous litter plan in relation to public toilets remained unfulfilled but that is not any reference in the new draft plan to public toilets. Public urination and human waste are serious cleanliness issues. Last year alone the DublinTown cleaning team responded to over 1,000 requests for the removal of human waste as well as dealing with many more requests to have areas power-washed due to urine staining. Properly maintained public toilets could help address this issue.

As the provision of public toilets has not been prioritised by the City Council, the business community are required to provide this public service at considerable cost in terms of staff, maintenance and water usage. We believe that this is a necessary service which should be provided by the City Council for the public. The provision of safe, clean, public toilets would also be of considerable benefit to families with young children and the elderly.

## **Dog Litter**

There is a continuing problem with dog litter in the city centre, particularly in areas with a higher residential population. Under section 4.12 of the Plan, Dublin City Council committed to increasing the number of dog litter bins/pooper scooper units to 170 citywide in the period 2008-2011.

However the draft plan for 2016 – 2018 notes that the use of dog waste bins was scrapped and the introduction of free dog litter bags was introduced in place of this. These free bags are not very visible in city parks or on streets in the Central Business District (CDB). We would ask that the effectiveness of the removal of the dog waste bins compared to the free bag concept.

We would also be supportive of a designated dog-park within the city centre and support the proposed reintroduction of bins in city parks. This would reduce the amount of dog waste on the streets while providing a space for dogs to exercise in a built-up environment. The return of these bins to certain city streets, especially those with high residential occupancy should also be considered. With regards to anti-dog litter campaigns and educational materials, we would be interested in whether they have had any measurable impact.

## **Street Cleansing**

In general, zoning and frequency of cleansing operations in Dublin city is very effective. However, we would suggest the enhancement of the baseline cleaning agreement in certain Category 1 retail streets. For example in light of the improvements as part of the Grafton Street Improvement Scheme, cleaning regimes on Grafton Street should be enhanced commensurately. During the summer months, the streets become stained and greasy and although there may be no loose litter present, the perception is still of the city as being unclean. The enhancement of street washing in “Urban villages and suburban areas” is mentioned and we would hope to see a similar increase in provision of street washing services in the core city centre, especially during prolonged periods of dry weather.

To combat street staining we believe that there should be an expansion and intensification of pavement washing services, especially during the summer period and we believe that the specialised equipment owned by Dublin City Council is not being used to its full capacity. Streets which service large volumes of public transport such as Westmoreland Street, D’Olier Street, Talbot Street and Nassau Street would particularly benefit from an improved service provision of this nature.

We are also in favour of an enhanced street cleansing provision for certain laneways which were historically used for service access but have become vibrant, social areas. Dame Lane, Dame Court and Anne’s Lane are examples of such areas which would benefit from an improved baseline service provision. One other area of concern is around Mary Street where a number of unlicensed street traders operate. These traders primarily sell fruit but also toys, clothing and other goods. They regularly create litter problems on the street by dumping crates, packaging and even pallets on the street. They operate along Mary Street on a daily basis and do not appear to be subject to enforcement from either litter wardens or casual trading officials.

## **Enforcement**

DublinTown is of the view that there is insufficient enforcement of the Litter Pollution Acts and other relevant regulations. The lack of enforcement serves to undermine the work of the City Council and the legislative instruments which are in place. In the draft plan there is a commitment to maintain the number of litter wardens, of whom there are 16, for the two year life span of the plan. This seems to be a reduction from the 2014 levels cited when 18 litter warden staff were employed. We would hope that additional staff could be recruited for this important role rather than simply retaining the level at 16. It is outlined that in 2014 wardens dealt with 10,265 complaints, if a similar number of complaints were received in 2016 this would result in an average of 640 complaints being dealt with per annum by each warden and this function could be outsourced if this was felt necessary.

We are interested in the outcome of any procedural review and any shortcomings which were identified. We would be strongly in favour of more 'on-the-spot fines' and prosecutions in the Courts, particularly for littering and dog-litter. We would also welcome further 'blitz' campaigns in the city centre as a means of increasing the visibility of the Litter Wardens. Dublin City Council might consider the employment of additional litter wardens for the issuing of on-the-spot fines which could be outsourced to a professional third party company in a similar manner to the parking enforcement arrangement with Dublin Street Parking.

We are in favour of the 'Name and Shame' campaign which we believe could be a useful deterrent whereby those convicted of littering offences would have their names published. Since Dublin City Council has exited the waste collection market the standards of waste collection have deteriorated. In this context, the updated 2013 bye-laws for the presentation and collection of waste are very welcome however it is crucial that there is an effective enforcement regime to back up these progressive byelaws. It has been indicated to us that there may be unlicensed or unregulated collection contractors operating within the City Centre, this should be addressed as a priority and some form approved branding or visible licence could be supplied by the City Council to those waste collection companies that are permitted to collect in the city centre. As the body responsible for the regulation of waste collection, Dublin City Council must take appropriate action where collectors are not making pick-ups and where waste is left overnight uncollected. There is also a need for the development of a systematic approach to dealing with bags that are left on the street because the waste collector will not remove them as they are overloaded and too heavy. There needs to be a system for fining those who overload their bags, the customer identification requirements brought in under the recent bye-laws should allow for this type of enforcement action to be carried out.

DublinTown is supportive of the proposed greater use of CCTV in litter blackspots throughout the city. DublinTown would be happy to assist the City Council in identifying litter blackspots within the BID area which may benefit from such measures.

## **Illegal Dumping**

As per the section above in relation to Enforcement, DublinTown supports the greater use of CCTV in tackling the issue of illegal dumping and the bringing of fines against those found responsible.

The proposed “Bulky waste collection crew” is to be supported, much illegal dumping can take the form of abandoned wooden pallets, furniture or heavy home appliances which can be difficult to remove. A specialised service to deal with such issues could make a very positive difference in the presentation of the city. We would also support the opening of bring centres on Sundays as this could help reduce the appearance of such types of litter in the first place.

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