



Review of Litter Management Plan 2008-2011 – Submission by DublinTown

Introduction

Dublin City Business Improvement District trading as DublinTown welcomes the opportunity to make this submission on litter management in the city centre. DublinTown is the city's business improvement district and is a collective of 2,500 businesses based in the core city centre area. Collectively, these businesses employ almost 50,000 people and contribute €1bn in tax revenue each year.

DublinTown and its members are fully supportive of the development and implementation of a new Litter Management Plan. The issues of litter management and cleaning are crucial to businesses in the city centre. In the 2011 'Your Dublin, Your Voice' survey, 17% noted that litter and cleanliness levels were the worst thing about Dublin, ahead of traffic and cost of living. The problem of litter in the city centre, combined with the lack of enforcement is having a negative impact on perceptions of the city as a whole. Investment in the development and implementation of a new Litter Management Plan is therefore in the interests of the city centre business community.

The Litter Management Plan 2008-2011 was comprehensive, covering litter management and cleaning as well as important issues such as education and awareness, partnership and enforcement. The focus on engagement with the public and businesses was particularly welcome. As the previous plan ended in 2011, it is unclear whether certain targets and aims were met. We welcome the reintroduction of the Litter Management Plan for 2016-2018 and look forward to working in partnership with Dublin City Council.

Litter Management and Cleaning

The baseline cleaning agreement between Dublin City Council and DublinTown is an effective partnership which aims to achieve the common objective of making Dublin City Centre a cleaner and safer place in which to do business. DublinTown provides a rapid response cleaning service to our members to ensure that any dangerous or unsanitary waste is removed from the BID area within an hour of it being reported. We also provide additional cleaning for lanes and secondary streets to ensure that they maintain an acceptable level of cleanliness. In 2014, our daytime and night-time cleaning crews collected a total of 112,640 kilograms of waste. In addition, 21,120 kilograms of waste from uncollected bags were picked up due to non-collection.

Notably, DublinTown continues to pay commercial rates for the disposal of this 112 metric tonnes of waste; we believe this should be waived.



Figure 1: DublinTown cleaners on South King St.

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. To combat this 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 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.

As the last Litter Management Plan covered the period 2008-2011, we would be interested in a review of the budget for street cleaning and management from 2011-2015 as well as the period 2016-2018.

Graffiti

International research has shown that graffiti serves as an invitation for antisocial behaviour and crime. When DublinTown first began removing graffiti from the city centre in 2008 there was over 3,000 m² of graffiti on business premises throughout the city. We continue to remove graffiti regularly and removed over 20,000 m² in 2014. DublinTown and our members would be strongly in favour of the extended use of CCTV surveillance and covert cameras to tackle graffiti, as well as fly-tipping, stickering and littering. These are persistent issues for businesses in the city centre and ongoing surveillance could act as a deterrent.



Figure 2: DublinTown staff removing graffiti from a laneway

We are supportive of graffiti education and awareness and we would be interested in what measures have been advanced with schools and community organisations as outlined in the previous plan.

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 assessment for the renewal of the Creative Quarter's Purple Flag, failure to provide adequate public toilet facilities was noted. 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. We would welcome a further increase in the number of these units in the city centre as well as a map of their location. We would also be supportive of a designated dog-park within the city centre. This would reduce the amount of dog waste on the streets while providing a space for dogs to exercise in a built-up environment. With regards to anti-dog litter campaigns and educational materials, we would be interested in whether they have had any measurable impact.

Litter Prevention, Education & Awareness

DublinTown and our members are very supportive of continuing education and awareness about litter prevention. While we favour investment in practical, infrastructural additions, we recognise that campaigns can play an important role in changing the habits of future generations. We would be particularly interested in seeing how Dublin City Council has monitored the effectiveness of past campaigns and what the measurable impacts of such campaigns have been. We believe that the promotion of the central 'litter hotline' number could form part of a future campaign. We would welcome further investment in research and focus groups to identify the attitudes, causes and behaviours that result in littering. We would be very interested in the results of any of the surveys undertaken since the National Litter Pollution Monitoring System (NLPMS) and the results of any surveys conducted since 2008.

Despite the welcome introduction of the 'Poster Protocol' in 2007, there is a persistent problem with fly-postering in Dublin city centre, particularly on streets with a higher number of vacant units. In order to combat these unauthorised advertisements, greater promotion and enforcement of the Protocol is necessary. At present, offenders from outside the Republic of Ireland are evading prosecution. This is an issue with numerous groups from Northern Ireland who do not abide by the protocol and regularly place posters and distribute flyers throughout high footfall areas of the city. We would support the introduction of a provision whereby groups or individuals from outside the jurisdiction can be penalised for leafleting or fly-postering.

We believe that public litter bins are an under-utilised asset that could be used better to put across anti-litter messaging and also to help identify and brand different districts within the city. This sort of use is already in place in areas like Temple Bar where the A4 sized panels on each litter bin feature a Temple Bar branded message about cleanliness in that area of the city. We believe there is scope to extend this out to other areas in the city such as the Creative Quarter. We would also like to see full-bin wraps used again for similar public awareness campaigns, such as the visually impactful "bin your butt" campaign from 2010.



Figure 3: Example of full-bin wraps

We also believe that additional litter bins and barrels should be made available as waste receptacles during major events such as the St. Patrick's Festival. With the various commemorative events around the 1916 Centenary this is likely to become a greater litter prevention requirement.

Responsibility and Partnership

Effective cooperation and partnership with DCC is a cornerstone of DublinTown and we welcome DCC's recognition of the importance of communication and liaison with the Business Sector. We enjoy a good working relationship with the Public Domain Officers on the North and South side of the city and we would welcome the opportunity to work more closely with the Litter Prevention Officer and the Green Business Officer. We would welcome further clarification on the role of the Litter Prevention Officer and the Green Business Officer in relation to businesses and their connection to the Public Domain Officers.

DublinTown welcomes DCC's commitment to supporting formal business partnerships and initiatives and we would be happy to share any information with our members via our website or social media accounts.

An example of successful partnership is DublinTown employment of two people through the Gateway Scheme which has led to improvements in the cleanliness of the city centre.

DublinTown also worked closely with Dublin City Council regarding the updated bye-laws on waste presentation and collection. We made a detailed submission on these new bye-laws and their ratification and introduction was very welcome. We believe that appropriate derogations should be introduced to permit later waste collections in the central business district to facilitate the collection of waste from restaurants and bars. Many of these establishments will not close or present their waste until after midnight and it would not be permissible or advisable for such businesses to have to store their waste on-site overnight. A suitable collection regime should be encouraged which allows for the early morning (2-3am for example) collection of waste so that these types of business are catered for effectively.

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. 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 bye-laws. 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 system for fining those who over load 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.

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