



CLONSKEAGH RESIDENTS' ASSOCIATION

**SUBMISSION TO THE PUBLIC CONSULTATION ON
DÚN LAOGHAIRE RATHDOWN COUNTY COUNCIL'S
DRAFT LITTER MANAGEMENT PLAN 2027-2029**

10 September 2026

BACKGROUND

Dún Laoghaire Rathdown County Council published its Draft Litter Management Plan 2027-2029 on its <https://dlrcoco.citizenspace.com> platform on 14 August 2026 for a Public Consultation.

The Council invited the public to submit their thoughts on the Draft Plan in this Public Consultation. These views *"will help to protect the environment and achieve the objectives of the Litter Management Plan for the period 2027 to 2029."*

The closing date for receipt of submissions to this Public Consultation is Friday, 11 September 2026.

FORMAT

The format of these submissions was set by Dún Laoghaire Rathdown County Council.

The submissions were required to respond to a set of 18 questions and limited to a 2,000 character response.

The Association's submission comprises:

- A brief summary of the Council's Draft Plan in respect of the question and
- The Association's comments on the subject of the question.

1. Please provide your comments on the section of the Draft Plan titled "Introduction".

Introduction:

Dun Laoghaire Rathdown County Council has prepared a Draft Litter Management Plan for 2027 to 2029. The plan has four pillars:

- Preventing litter before it happens
- Working with local communities
- Daily cleansing
- Enforcement of laws relating to litter.

The Council strives for a cleaner county. Its efforts include educating people about litter, checking public spaces, cleaning beaches, streets, etc. and working with local groups.

Clonskeagh Residents' Association's (CRA's) Comments:

Clonskeagh Residents' Association (CRA) welcomes the Plan's four-part approach: prevention, community engagement, operations and enforcement.

CRA welcomes the recognition given to Residents' Associations and other local groups as part of the Council's involvement with local communities to improve litter management in the County.

CRA ran two Community Clean-ups in Clonskeagh during 2026, with support from the Council. Ten bags of litter were gathered for the Council to collect.

These clean-ups, and comments from residents, pointed to some recurring problems in Clonskeagh:

- Litter near retail outlets
- Bins placed out too early or not removed promptly from public footpaths
- Plenty of cigarette litter
- Occasional dumping or fly tipping in quiet spots, such as alleyways

These are local observations, not a full survey. They shaped CRA's comments in this submission.

2. Please provide your comments on the section of the Draft Plan titled "Why Protect Our Environment?"

Environment:

The Draft Plan states the County's population of 233,860 people are spread over an area from Booterstown in the north to north Bray in the south and west to Rathfarnham.

The County's terrain comprises coastline, coastal towns, inland urban areas, towns and mountains.

CRA Comments:

The section is a mere summary, descriptive narrative of the County's population and geography.

It fails to advance any arguments for protecting our environment, the subject of the question. This is a surprising oversight by a local authority that has clear environmental duties.

Protecting the environment gives these benefits:

- Better health - Clean air, clean water and litter-free locations remove or reduce threats to health such as respiratory and gastrointestinal ailments, infections, etc.
- Reduced climate change - Healthier forests, wetlands and seas improve the planet's resilience in the face of climate change
- Better food security - Ecological diversity is improved by increased pollinator populations, pest controls and more stable weather patterns
- Survival - Human race will be more likely to survive in a safer, more habitable planet.

Focussing on the importance of litter and waste management, protecting our environment means:

- Protecting wildlife from being trapped by or consuming plastic
- Preventing toxins from cigarette butts and waste from leeching into the environment
- Ensuring cleaner habitats for all by removing non-biodegradable waste
- Keeping all waters clean for both humans and nature to enjoy
- Reducing methane emissions from discarded food waste
- Recycling of discarded paper, plastic and metal uses less energy than that used in making new materials from raw resources

3. Please provide your comments on the section of the Draft Plan titled "What is Litter?"

Litter:

Litter is any item left in the wrong place.

CRA Comments:

We agree with this definition.

4. Please provide your comments on the section of the Draft Plan titled "The Effect of Litter on the County"

Effects of Litter:

Litter is a serious problem. It can harm wildlife and the environment, it makes an area look neglected and it can impact public health. The Council commits people and money to deal with litter in the County, specifically:

- Litter wardens
- Street cleaning
- Litter bins
- Litter controls and
- Litter awareness campaigns

CRA Comments:

The Draft Plan relies on too much descriptive narrative to describe the County's litter problem and what has been and is to be done to deal with it.

There is a lack of data in the Draft Plan, especially graphic data that would help readers' understanding of the challenge. The Plan should contain relevant data so that its targets can be appreciated.

The Draft Plan has no mention of the Street Bin Review 2026 published by the Council in April 2026. A reader's understanding of the County's litter problem and what the Council is doing in the Draft Plan would be greatly improved by including parts of the Street Bin Review 2026 document, especially historic data and trends in a more understandable manner.

Much improved data presentation and less use of descriptive narratives would help readers to better understand the effects of litter on the County and how the Council is allocating its resources to tackling litter each year.

More granular data with recent historic trends would assist understanding the scale of the litter problem and its evolution, both actual and planned.

A better understanding of the County's litter problem is essential to building public awareness and buy-in so that all can work to improve the outcome.

5. Please provide your comments on the section of the Draft Plan titled "Waste Enforcement".

Waste Enforcement:

Waste is anything discarded by a person. Waste includes litter (defined as "anything left in the wrong place"). Litter enforcement involves fines under the Litter Pollution Act. The more substantial waste problems are covered by the Waste Management Act.

Waste problems include:

- Illegal dumping, possibly involving Unauthorised Waste Collectors
- The need to inspect Household Waste
- The need to check on Business' compliance with various waste rules and schemes
- Single use plastics

CRA Comments:

Our Community Clean-ups have found occasional fly tipping in quiet spots such as alleyways from time to time.

As Clonskeagh is predominantly a residential area, one local waste problem is how multi-unit developments (MUDs) such as apartments manage their waste. The Council's Waste Presentation Bye-laws prefer MUDs to use one industrial bin for each waste/recycling/compost collection and to have them collected from a safe, central location, not the public footpath or road.

Some MUDs however, prefer to leave each occupier with their own waste/recycling/compost bins that are placed on the public footpath for collection. Invariably, in this scenario, each occupier may place their bins out earlier than the permitted time of 6:00 pm on the day prior to collection. And/or, they may not remove their bins from the public footpath before 10:00 am on the day after collection.

The Council should be vigilant about the MUDs' management companies' and occupiers' compliance with the Council's own Bye-laws. It would be worth issuing a formal letter annually to each MUD management company to remind them of their duty to provide their occupiers with written instructions about the waste separation, storage, placement and bin removal rules.

The Council's local litter wardens should inspect the compliance of the occupiers of each MUD in their area throughout the year and take any necessary action to obtain compliance.

6. Please provide your comments on the section of the Draft Plan titled "Legislation".

Legislation:

Legislation and regulation related to litter is contained in a bevy of EU rules, 3 Irish laws, 1 Irish waste management plan and several Council bye-laws covering waste, beaches and harbours. The Council is required to review its Litter Management Plan every 3 years.

CRA Comments:

The evolution of legislation and regulation related to litter has been piecemeal, driven mainly by a specific focus e.g. single-use plastics, local waste bye-laws, etc.

There is a risk that this piecemeal approach has left gaps in legislation and regulation, even possible conflicts.

Perhaps the Council is aware of these deficiencies and, if it is, the Council should inform the Department of Housing, Local Government & Heritage of its views to seek the appropriate legal and regulatory remedies to resolve these deficiencies.

Finally, rather than review its Litter Management Plan every 3 years with the aim of updating/rewriting it, the Council should instead review the Plan annually to see:

- What is going well and why
- What is not going well and why
- What needs to be done to improve performance and why
- What additional resources (people and funds) are needed or what resource re-allocations are required due to changed circumstances
- What annual targets need to be revised and why

This approach makes the Litter Management Plan a living document for the Council, its councillors, officials and staff. This would elevate the status of the plan and improve the focus of the Council in delivering on the Plan's goals by 2029.

7. Please provide your comments on the section of the Draft Plan titled "What are the Litter Issues facing DLR?"

Litter Issues:

The Council defines the County's litter problems as:

- General litter
- Abandoned vehicles
- Illegal dumping
- Graffiti
- Storage & presentation of bins
- Derelict & vacant properties
- Illegal signage
- Abandoned shopping trolleys
- Dog fouling

CRA Comments:

CRA's own Community Clean-ups and observations suggest cigarette litter, litter near shops and bins left out after collection are the main local litter problems.

Cigarette litter: The Plan states cigarette items made up 65.2% of DLR's litter in 2025. This is comparable with what CRA has seen in Clonskeagh. CRA welcomes the planned ashtrays and awareness campaigns. We ask for clear targets to cut cigarette litter, with yearly reporting.

The Department of Housing etc. and local authorities should seek more producer responsibility by cigarette/vape producers and retailers, requiring them to fund their products' litter disposal e.g. the new ashtrays.

Litter near retail outlets: CRA has seen litter build up near these premises, much of it single-use wrapping. CRA supports the Council working with these businesses for an improvement. The Council should use its full powers where a problem keeps happening at one location. The Council should not shy away from its enforcement power to require businesses to meet their duty to keep footpaths within 100 metres of their premises litter-free.

MUDs' bins: CRA supports continued attention and enforcement on to how bins are stored, put out for collection and removed promptly to storage at MUDs.

Repeat litter problem spots: CRA asks the Council to use a clear three-step approach for hotspots: find the problem, act on it (through cleaning, engagement, new equipment or enforcement), then check whether it worked.

CRA also asks for reporting at local level, so residents' groups understand the issues in their own area, not just County-wide figures, and so gain local buy-in to resolving the problem spots.

8. Please provide your comments on the section of the Draft Plan titled "What are my obligations?"

My obligations:

Everybody living, working or visiting the County and every business in the County has litter management obligations to meet:

- Keep your property litter-free and, if a business, the footpath within 100 metres of its premises
- Do not create litter and waste in the County; manage your litter and waste responsibly
- Segregate waste properly, secure its storage and properly place it out for collection or secure it when transporting it to a waste facility
- Do not use public litter bins for your litter and waste
- Report litter problems to the Council; talk to the Council with litter and waste queries

The Council will seek to prevent and control litter by increasing public awareness, providing and emptying litter bins regularly and reminding businesses of their obligations.

CRA Comments:

CRA supports the obligations placed on businesses to keep their public footpaths clean within 100 metres of their premises. This would help resolve litter problems near local retail premises.

CRA highlights that management companies of MUDs have obligations under the Council's Waste Presentation Bye-Laws, including giving residents clear written information on how to store, sort and put out their waste. CRA asks the Council to remind management companies of these duties from time to time, at least annually.

CRA would like to seek a more active, sustained engagement with local groups (residents' associations, churches, schools and businesses) to boost litter awareness and to educate the community better on managing litter.

9. Please provide your comments on Objective 1 of the Draft Plan: Litter Prevention and Control.

Litter Prevention and Control:

The Council is seeking a litter-free county. Its Litter Management Plan has four objectives:

- Litter Prevention & Control
- Community Engagement & Awareness
- Operations
- Enforcement

Objective 1 (Litter Prevention & Control) relies on:

- Litter Wardens patrolling, helping residents and businesses with their litter problems early and on enforcing the relevant penalties for littering
- An estate of compactor litter bins
- Anti-litter and anti-dog fouling signage
- An estate of Bring Banks throughout the County
- Three Recycling Centres

CRA Comments:

CRA welcomes daily warden patrols of known litter hotspots.

CRA asks the Council to set out clearly, for each hotspot, what the problem is, what action is to be taken, and whether it worked. This 'find it, fix it, check it' approach should apply across the County.

CRA welcomes the growth in Smart Bins and the plan to keep replacing old ones. Indeed, the replacement of Smart Bins beyond their useful life should be accelerated as a key litter prevention task. CRA asks for a clear yearly plan showing how many bins will be targeted for retirement and purchase each year from 2027 to 2029, with reporting of the actual results each year.

CRA asks the Council to keep basing new bin locations on evidence: population growth both recent and planned, new housing and shops, footfall, known problems, and requests from residents.

Where litter builds up near retail units and businesses, CRA asks the Council to use its full powers, including obliging the business owners to keep public footpaths within 100 metres of their premises free of litter, to fix the problem at the source, rather than relying only on clean-up afterwards.

10. Please provide your comments on Objective 2 of the Draft Plan: Community Engagement & Awareness.

Community Engagement & Awareness:

Objective 2 of the Litter Management Plan (Community Engagement & Awareness) puts a very heavy emphasis on community involvement and awareness to achieve improved litter management in the County.

A wide variety of measures are planned or arranged by the Council:

- A series of school programmes
- Engagement with Residents' Associations, Tidy Towns group and other groups, leading to a Tidy Districts competition for the County and competing in the National Tidy Towns competition
- Support for home composting, graffiti removal and other measures.

CRA Comments:

CRA welcomes the Council's support for schools, clean-up groups, Tidy Towns and similar work to boost more community support and involvement in litter management.

CRA particularly welcomes the Green Business Officer role, which helps local shops reduce their littering impact and increase their green activities. CRA sees this as a useful tool for tackling litter near shops.

One concept the Green Business Officer ought to explore is encouraging food retailers to move from selling packaged goods to selling loose goods using calibrated dispensers. Customers could collect their dispensed goods in their own containers. This is done in Canada for example.

CRA suggests using awareness campaigns to remind MUD management companies of their waste management duties, alongside reminders to residents.

11. Please provide your comments on Objective 3 of the Draft Plan: Operations.

Operations:

Objective 3 (Litter Operations) deals with the Council's

- Litter bins
- Cigarette litter
- Meeting community bin requests
- Street cleaning
- Graffiti removal

CRA Comments:

CRA welcomes the planned new ashtrays on Smart Bins and plans to fit more to older bins. CRA asks for a clear target to cut cigarette litter over the Plan's term, with yearly targets and results published.

CRA welcomes the Council's use of real-time Smart Bin data to plan servicing and collection routes. CRA asks that the yearly Smart Bin Review explains, in simple terms, how this data changed the location of bins and their regular servicing, and whether problems like overflowing bins have improved.

CRA asks for a clear yearly plan for retiring and replacing all categories of bins from 2027 to 2029, with targets and results reported each year.

Given the "beyond useful life" status of 54% of the Council's current bin estate, there is a clear demand to accelerate these bins' replacement. The purchase of additional bins to meet the demands of an increasing population and building stock also looms. The Council must allocate more funds to both the replacement and expansion of its bin estate than those indicated in the Draft Litter Management Plan. That increased funding would evidence the Council's prioritising of delivering its Litter Management Plan for the 2027-29 period.

12. Please provide your comments on Objective 4 of the Draft Plan: Enforcement.

Enforcement:

Objective 4 (Enforcement) lists the Council's penalties, co-operation with Gardai on specific tasks such as bonfires and waste transporting and the use of CCTV monitoring.

CRA Comments:

CRA welcomes the phased return of CCTV at the worst litter and dumping spots, carried out properly and promptly through the CCTV Oversight Board.

CRA asks for yearly reporting on how the CCTV programme is progressing, and, where there is enough evidence, whether it has cut repeat dumping or littering at those spots.

CRA agrees that fines and prosecutions should keep being reported, but says that more fines should not, on their own, be seen as success. The real goal is fewer litter offences, cleaner streets and fewer fines (as a result of improved litter control).

Enforcement fines should not be subject to an annual target or seen as a revenue source. Instead, the reporting of fines should state how many inspections and communications were completed by the Council for each incident before a fine was imposed. This would show both the Council's efforts to prevent recurrence and the level of repeat littering.

13. Please provide your comments on the section of the Draft Plan titled "Implementation and Monitoring of the Litter Management Plan 2027-2029".

Implementation and Monitoring:

The Implementation & Monitoring section of the Draft Litter Management Plan 2027-29 is a tabulation of a variety of actions planned to deliver the Plan's 4 Objectives. Responsibility for delivering each action is allocated and a tentative timescale is stated for each.

CRA Comments:

This section of the Draft Plan is the weakest and vaguest. It fails to state Specific, Measurable, Achievable, Relevant and Timebound (SMART) targets for the actions. This section is of no value to assessing if the Council is delivering on the Plan throughout the next 3 years. No business, even on a much smaller scale than the County Council itself, operates in that manner.

Given the scale of the County Council's operations, the Litter Management Plan should include appropriate SMART annual targets for various activities over its 3 year life. These annual targets would drive the relevant capital funding and permit the Council to assess its progress during its 3 year planning period.

The use of SMART annual targets and their measurement and reporting would allow the Council to make better use of its expenditure of public moneys and to modify both the Plan and its resource allocation during the Plan's term should circumstances change materially.

The Litter Management Plan would benefit from having a clear, known owner (Infrastructure & Climate Control ?) rather than leaving responsibility for delivery to various Council teams/departments. The Plan's owner then seeks its delivery with their Council colleagues and external bodies and community groups.

The Plan owner should develop a suitable reporting mechanism with its targets and the actual performance that is published publicly. This agrees with Objective 5 (Provide for the systematic and timely publication and dissemination of key data on local service provision and improve public understanding and engagement) of the Local Democracy Taskforce - Government Implementation Plan (July 2026) and its Action Nos. 34 and 35.

14. Are there any additional measures that should be included in the Plan to help prevent and reduce litter?

Prevention and Control of Litter - additional measures:

CRA Comments:

The Council should look into and learn from the litter and waste management practices elsewhere in Europe, for example, Munich, Prague and Madrid. Dun Laoghaire Rathdown County is not the first municipal area to encounter litter and waste problems.

Some additional measures the Council should consider for inclusion in the Plan are:

- Requiring underground waste & recycling collection bins beneath MUDs and also implementing this beneath public realms of sufficient size that permits their retrieval. Yes, there is a cost to this but it cuts down on bin scavenging by Return-It plunderers and wildlife and also prevents overflowing bins while increasing waste and recycling collection volumes.
- Increase the Smart Bin estate when replacing "expired" bins and use the increased telemetry to guide waste collection staff to empty Smart Bins that reach 90% full, hence moving away from a fixed waste collection schedule and ensuring Smart Bins are not overflowing.
- Publish Smart Bin data to the public to evidence those litter bins are working and being collected regularly.
- Seek to enforce producer responsibility for cigarette and vape litter on their producers and retailers as is happening elsewhere in Europe under the EU Single Use Plastics Directive. This should lead to producers and retailers funding elements of litter management (through, for example, funding infrastructure expansion) but may likely require the Department of Housing etc. to enable it.

15. Are there any additional measures that should be included in the Plan to help increase community engagement and awareness?

Community Engagement and Awareness - additional measures:

CRA Comments:

Publishing regular, relevant and meaningful data on the County's litter and waste management performance in its many forms in a public forum or dashboard would emphasise the importance being attached for litter and waste management for the common good. The data could be for each Electoral Area so that community groups, schools, etc. could better understand how their contribution helped that Area's performance (or was offset by other factors).

Also, develop and maintain thereafter a DLRCoCo.ie website section focussed on litter and waste management. The new webpages should be aimed at educating residents, making them more litter-aware and providing clear guidance and advice in a communication style and manner that is understood by the recipient, not in terms of the Council officials' understanding and knowledge. Look at, for example, <https://stadt.muenchen.de> and <https://www.awm-muenchen.de> for how Munich does this communication.

16. Are there any additional measures that should be included in the Plan to help improve litter management and cleansing operations?

Litter Management and Cleansing Operations - additional measures:

CRA Comments:

It may be necessary to accept the need to increase the staffing, vehicle and equipment in the Council's litter management and cleansing operations to deliver a better service for an increasing population and building stock in the County. Changing work practices such as increased use of telemetry in Smart Bins should drive prompt collection of almost-full bins and discard the need for a fixed collection schedule. Changes such as this increase operational efficiency and reduce the risk of additional litter from overflowing bins.

17. Are there any additional measures that should be included in the Plan to help improve the enforcement of litter laws?

Enforcement of Litter Laws - additional measures:

CRA Comments:

Working with the Department of Housing etc. and other local authorities, identify gaps and loopholes that exist in the current Irish legal and regulatory framework for litter and waste management (which grew up piecemeal) and how these can be closed efficiently. Also examine with them what current Irish laws and regulations need updating or revision.

18. Please provide your comments on your overall view of the DLR Draft Litter Management Plan 2027-2029.

Overall view:

CRA Comments:

The Draft Plan has two weaknesses.

First, the Street Bin Review 2026 published in April is not mentioned. The Review included some useful data that should be added in a better form of presentation to the Draft Plan to give the reader a better context for the Plan's content.

Second, the Plan relies on substantial descriptive narratives. Narratives should be minimised to explain what has happened and why or what is planned and why. As mentioned earlier, the Plan should have annual SMART targets for the key activities listed in the Plan. To provide a basis for those targets, there should be more historic data provided in the Plan in a suitable data presentation format that is readable and understandable.

END